FY 2014
Statement of Assurance (SoA) /
Managers’ Internal Control Program (MICP)
for AT&L and Defense Agencies
Training Session

Rosie Heraud / Freddie Anderson
Office of the Under Secretary of Defense
Acquisition, Technology and Logistics (OUSD(AT&L))
Acquisition Resources and Analysis (ARA)
Property and Equipment Policy (P&EP)
Management Internal Controls
• Statutory and Regulatory Guidance
• DoD Audit Readiness

Financial Systems and Financial Reporting Requirements

Statement of Assurance Package

FY 2014 SoA / MIC Program for AT&L and Defense Agencies
• Coordination on Defense Agencies Statement of Assurances
• Requirements and Timeline Summary
Management
Internal Controls
Management Internal Controls are...

• Methods by which an organization governs its activities to accomplish stated mission requirements

• First line of defense to prevent and protect against fraud, waste, abuse, and mismanagement

• Represent a series of actions or processes that occur regularly throughout operations, whether they are administrative, operational, or financial

• An integral part of every system management uses to regulate operations

Help lessen RISK
Management Internal Controls ensure that what *should* happen, *does* happen – every day
... but they must be in place, effective, and used.

In May 1995 the San Diego Police and the California Highway Patrol chase a stolen military tank down Interstate 805. *The tank was stolen from the National Guard Armory.*
The four categories of Internal Control (IC) Deficiencies are:

**Control Deficiency:**
A control deficiency exists when the design or operation of a control does not allow management or employees, in the normal course of performing their assigned functions, to prevent or detect misstatements on a timely basis. Control deficiencies are internal to a DoD Component and not reported in the statement of assurance to the Secretary of Defense (SecDef).

- **Reporting Requirement** - Internal to the organization and not reported externally. Progress against corrective action plans should be periodically assessed and reported to the MICP Coordinator.

**Reportable Condition:**
A control deficiency or combination of control deficiencies, that in management’s judgment, represent significant deficiencies in the design or operation of IC that could adversely affect the DoD Component’s ability to meet its IC objectives.

- **Reporting Requirement** - Internal to the organization and not reported externally. Progress against corrective action plans should be periodically assessed and reported to the MICP Coordinator.

**Material Weakness:**
A reportable condition or combination of reportable conditions that result in a reasonable possibility that a material misstatement will not be prevented or detected.

- **Reporting Requirement** - Material weaknesses and a summary of corrective actions shall be reported in the SOA. Progress against corrective actions plans should be periodically assessed and reported to the MICP Coordinator.

**Systemic Weakness:**
Pervasive within the DoD and materially affect internal controls across the organizational and program lines, usually affecting more than one DoD Component.

- **Reporting Requirement** - Systemic weaknesses and a summary of corrective actions shall be reported in the SOA. Progress against corrective actions plans should be periodically assessed and reported to the MICP Coordinator.
Which of the following internal control deficiencies, is defined as “a reportable condition or combination of reportable conditions that result in a reasonable possibility that a material misstatement will not be prevented or detected?”

- Control Deficiency
- Reportable Condition
- Material Weakness
- Systemic Weakness

This is a self assessment. It does not count against your overall score. Please select your answer and click submit.
Pilots’ checklists for takeoff, flight, before landing, and after landing became standard procedure after the 1935 crash of the Boeing Model 299 (predecessor to the famous Flying Fortress, B-17).

Pilots got together after the accident and decided that the new aircraft Model 299 was not “too much airplane for one man to fly,” but more than one man could remember without help. Checklists help compensate for the weaknesses of human memory to help ensure consistency and completeness in accomplishing a mission.
Statutory and Regulatory Guidance
Statutory and Regulatory Guidance

Federal Managers’ Financial Integrity Act (FMFIA) of 1982

OMB Circular A-123, Management’s Responsibility for Internal Control
• Appendix A, Internal Control Over Financial Reporting
• Assessment of Acquisition Functions

DoD Instruction 5010.40, Managers’ Internal Control (MIC) Program Procedures
FMFIA of 1982
Federal Managers' Financial Integrity Act of 1982:

- Amended the Accounting and Auditing Act of 1950 to require ongoing evaluations and reports on the adequacy of the systems of internal accounting and administrative control.

- Requires that internal controls be established to provide **reasonable assurance** that:
  
  o Obligations and costs are in compliance with applicable law,
  o Funds, property and assets are safeguarded against waste, loss, unauthorized use, or misappropriation, and
  o Revenues and expenditures applicable to agency operations are properly recorded and accounted for to permit the preparation of accounts and reliable financial and statistical reports and to maintain accountability over the assets.
FMFIA of 1982 requires the following from:

**OMB, in consultation with the Comptroller General, is required to:**

- Establish guidelines for agency evaluation of internal controls.

**Executive Agencies are required to:**

- Periodically evaluate internal accounting and administrative controls in accordance with OMB guidelines,
- Prepare an annual statement to the President and the Congress as to whether the agency’s system of **internal controls provides reasonable assurance**, and
- Report any material weaknesses in the agency’s system of internal controls, along with a plan and schedule for correcting them.
The FMFIA of 1982, requires that internal controls be established to provide reasonable assurance that:

- Obligations and costs are in compliance with applicable law
- Fund, property and assets are safeguard against waste, loss, unauthorized use, or misappropriation
- Revenues and expenditures applicable to agency operations are properly recorded and accounted for to permit the preparation of accounts and reliable financial and statistical reports and to maintain accountability over the assets.
- All of the above

This is a self assessment. It does not count against your overall score. Please select your answer and click submit.
OMB Circular A-123
Management has a fundamental responsibility to ensure that internal controls achieve the objectives of:

- Effective and efficient operations,
- Reliable financial reporting, and
- Compliance with applicable laws and regulations.
Management has a fundamental responsibility to ensure that internal controls achieve the objectives of:

- [ ] Effective and efficient operations
- [ ] Reliable financial reporting
- [ ] Compliance with applicable laws and regulations
- [ ] All of the above

This is a self assessment. It does not count against your overall score. Please select your answer and click submit.
Federal managers must:
• Develop and maintain cost effective internal controls for results-oriented management,
• Continuously monitor and assess the effectiveness of internal control in their programs and operations,
• Take timely and effective action to correct any deficiencies, and
• Report annually on the effectiveness of internal controls, any material weaknesses and plans for their correction.
True or False: The cost of the controls should be relative to the importance and risk associated with a given program.

☐ True
☐ False
The Sarbanes-Oxley Act of 2002 applies to commercial organizations:
- Attempts to prevent the manipulation of financial statements and restore public trust in financial statements and stock markets.
- Makes senior executives responsible for the accuracy and completeness of their firm’s financial statements.
- Requires auditor independence (limits auditor conflicts of interest).

OMB Circular A-123, Appendix A, Internal Control Over Financial Reporting (ICOFR), applies to Federal agencies:
- The concept of executive responsibility for financial reporting was extended to Federal agencies.
- ICOFR is a process designed to provide reasonable assurance regarding the reliability of financial reporting.
Key Elements for Assessing Controls over Financial Reporting:

- Establish a Senior Assessment Team (SAT)
- Evaluate Internal Control at the Entity Level
  - By understanding management’s perspective, knowledge and actions of internal control by ensuring integrity and ethical standards, commitment to competence, management philosophy, organizational structure and assignment of authority and responsibility.

- Evaluate Internal Controls at the Process, Transaction, or Application Level - and obtain knowledge of the organization’s key processes by performing risk assessments with regard to financial assertions of:
  - Completeness
  - Rights and Obligations
  - Valuation
  - Existence and Occurrence
  - Presentation and Disclosure
  - Compliance with Laws and Regulations
  - Safeguarding of assets from fraud, waste and abuse
  - Identifying key controls intended to mitigate identified risk
Key Elements for Assessing Controls over Financial Reporting (continued):

- Overall assessment [assessing and testing] of the design and operation of ICOFR.
- Reliance of other work [e.g., Inspector General] to accomplish assessment.

Documenting ICOFR:

- The SAT should document its understanding of the Agency’s ICOFR
  - The entire assessment process from establishing of a SAT to the identification of deficiencies and development of corrective action plans.
Appendix A requires a management assurance statement that specifically addresses the effectiveness of ICOFR.

• This assurance statement must be based on the assessment process (defined in Appendix A) which evaluates internal controls at the:
  o Financial statement entity level
  o Process, transaction or application level
• Requires ICOFR assurance statements to be completed and reported in the Agency Financial Report (AFR)

To view the DoD AFR, go to:

- Requires the use of the Acquisition Assessment Template, which must be incorporated into existing internal control review and reporting processes
- OMB Template largely based on GAO’s Framework for Assessing the Acquisition Function at Federal Agencies
- DoD Approach:
  - On April 6, 2009 Director, Acquisition Resources and Analysis issued DoD Guidance on the Assessment of Acquisition Functions under OMB Circular A-123
Assessment of Acquisition Functions

OUSD (AT&L) created a DoD template to assist when completing the assessment. The OMB and DoD template contain the same four interrelated cornerstones. These cornerstones are the foundation for evaluating the acquisition function:

**Organizational Alignment and Leadership**
- Looks at the appropriate placement of the acquisition function in the agency.
- In this section, each Component must assess whether the current placement of its acquisition function is meeting its organizational needs.

**Policies and Processes**
- Policies establish expectations about the management of the acquisition function.
- Processes are the means by which management functions will be performed and implemented in support of agency missions.

**Human Capital**
- The value of an organization and its ability to satisfy its customers depends heavily on its people.
- Components should think strategically about developing and retaining talent.

**Information Management and Stewardship**
- Information Management and Stewardship
- Effective knowledge and information management provide credible, reliable, and timely data to make acquisition decisions.
The DoD template helps guide the assessment:

- Based on the **control environment (policy goals identified by OSD)**, determine the **risks** to proper implementation
- Evaluate **existing controls** and **monitoring activities**
- Consider the corresponding “cornerstones” and success factors in the **OMB template**
- Determine if any new **deficiencies or material weaknesses**

**Guidance on the Assessment of Acquisition Functions** is also outlined in guidance provided by OUSD(C)

- DoD Instruction 5010.40, “Managers’ Internal Control Program Procedures”
- Department of Defense Federal Managers’ Financial Integrity Act Statement of Assurance Fiscal Year Guidance (Draft)
The four interrelated cornerstones in the OMB and DoD templates are the foundation for evaluating the acquisition function. They are: Organizational Alignment and Leadership, Policies and Process and:

- Human Capital and Information Management and Stewardship
- Control Environment and Risk Assessment
- Human Capital and Control Activities
- Risk Assessment and Information Management and Stewardship

This is a self assessment. It does not count against your overall score. Please select your answer and click submit.
DoD Instruction 5010.40, Managers’ Internal Control Program (MICP) Procedures:

DoDI 5010.40 implements the policy in the FMFIA and OMB Circular A-123 to assign responsibilities and prescribe procedures for the execution on the MICP
Requirements per the DoD I 5010.40 are:

**OSD Component Heads and Principal Staff Assistants (PSAs):**

- Approve the statement of assurance of the Defense Agencies and DoD Field Activities under their authority, direction, and control prior to submission to the SecDef.

- In their capacity as the DoD functional proponents, they maintain ownership of any DoD-wide material weaknesses. This includes:
  - Identifying and reporting systemic material weaknesses and reporting the status, until resolved.
  - Reviewing the reported actions of the DoD Components that pertain to their area of functional responsibility and promptly assisting to resolve any material weaknesses where leadership action is needed to correct the weakness.
Requirements per the DoD I 5010.40 are:

DoD and OSD Component Heads:

- Establish a MICP to:
  - Assess inherent risk in mission-essential processes
  - Document and design internal controls
  - Test the design and operating effectiveness of existing internal controls
  - Identify and classify control deficiencies and promptly prepare and execute corrective action plans
  - Monitor and report the status of corrective action plans until testing confirms resolution of identified weaknesses

- Designate in writing the MICP Coordinator of the DoD Component and oversee the MICP Coordinator’s implementation of procedures

- Conduct a formal assessment of the acquisition functions requirements outlined in the USD(AT&L) Memorandum and provide a summary of the assessment in the statement of assurance.

- Submit the annual statement of assurance to the SecDef. Provide separate explicit levels of assurance in a statement of assurance for each of the following three IC assessments required:
  1. Operational and administrative controls relevant to all mission-essential functions throughout their DoD Component, except financial reporting and financial systems
  2. Financial reporting functions, as assessed under the oversight of the senior assessment team
  3. Integrated financial management systems (IFMS) conformance with the federal requirements
Requirements per the DoD I 5010.40 are:

**Requires each DoD and OSD MICP:**

- Establish a Managers’ Internal Control Program that provides an annual statement of assurance to the SecDef, which includes an explicit level of assurance about the effectiveness of ICs. A copy of the statement of assurance will be provided to the Director, FIAR.
- Designate a Managers’ Internal Control Program Coordinator to assist in the execution of the Managers’ Internal Control Program.
Requirements per the DoD I 5010.40 are:

Assessable Unit Managers shall:

• Assess risk that may adversely affect the assessable unit’s mission or operations

• Identify internal control (IC) objectives that support the assessable unit

• Document operational, administrative, system and financial controls

• Review processes and procedures to provide recommendations for the enhancement, elimination or implementation of assessable unit internal controls

• Recommend the retention of controls, enhancement, elimination, or implementation of internal controls for the assessable unit

• Test the effectiveness of IC identified

• Identify and classify IC deficiencies according to the reporting categories

• Develop corrective action plans (CAPs) and track the progress of the plans

• Actively communicate with the MICP Coordinator on CAPs as required for reporting and resolution of all control deficiencies

• Maintain MICP documentation
The three separate explicit levels of assurance in an SoA are:

• **Operations Assessment** – overall program, operational, and administrative controls relevant to all mission-essential functions, except financial reporting and financial systems

• **Financial Reporting Assessment** – identifying and assessing the financial reporting internal controls by assessing the effectiveness of financial reporting ICs and identifying and reporting IC material weakness

• **Financial Systems Assessment** – assess, evaluate, and report the conformance of the DoD Components IFMS compliance with Federal requirements
DoD Instruction 5010.40, Managers’ Internal Control Program (MICP) Procedures:

When reporting a material weakness in internal controls, DoD Components must identify which of the following functional DoD IC Reporting Categories the material weakness concerns:

- Communications
- Intelligence
- Security
- Comptroller and Resource Management
- Contract Administration
- Force Readiness
- Information Technology
- Acquisition
- Manufacturing, Maintenance and Repair
- Other
- Personnel and Organizational Management
- Procurement
- Property Management
- Research, Development, Test and Evaluation
- Security Assistance
- Supply Operations
- Support Services
DoD Instruction 5010.40, Managers’ Internal Control Program (MICP) Procedures:

When reporting financial reporting or financial system IC material weakness, according to evaluations conducted, the DoD Component will classify the end-to-end business processes affected by the control weakness. The following IC categories will be used to classify the financial material weakness:

- Budget-to-Report
- Hire-to-Retire
- Order-to-Cash
- Procure-to-Pay
- Acquire-to-Retire
- Plan-to-Stock
Roles and Responsibilities

**USD (Comptroller):**
- Establish and maintain an internal control program
- Monitor compliance with DOD Instruction 5010.40
- Designate a DoD Senior Assessment Team (SAT) to provide oversight and accountability on ICOFR
- Director ARA, is the AT&L member of the DoD SAT

**OSD Principal Staff Assistants (e.g., the USD (AT&L)):**
**As DoD functional proponents:**
- Identify and report new systemic weaknesses,
- Report on the status of existing systemic weakness until resolved, and
- Review weaknesses reported by DoD Components and help resolve them.
- In addition, USD (AT&L) must assess internal controls over financial reporting in the Chemical and Biological Defense Program General Fund and Defense Technical Information Center.
Reasonable Assurance:
An informed judgment by management as to the overall adequacy and effectiveness of *internal controls (IC)* based upon available information that the systems of internal controls are operating as intended.

There are three possible assurance statements:
- **Unqualified statement of assurance** – provides reasonable assurance that IC are effective with no material weaknesses reported
- **Qualified statement of assurance** – provides reasonable assurance that IC are effective with the exception of one or more reported material weaknesses
- **Statement of no assurance** – unable to provide reasonable assurance because no assessments were conducted or the noted material weaknesses are extensive and/or pervasive.

FY 2013 SOA
Which of the following is not one of the MICP roles for the OSD Principal Staff Assistants?

☐ Identify and report new systemic weakness
☐ Report on the status of the existing systemic weakness until resolved
☐ Monitor compliance with DOD Instruction 5010.40
☐ Review weakness reported by the DoD Components and help resolve them

This is a self assessment. It does not count against your overall score. Please select your answer and click submit.
General Guidance
Understanding Management Controls

• Internal controls are designed to protect the Department from fraud, waste, abuse and mismanagement.

• Controls are:
  o The methods by which an organization governs its activities to accomplish stated mission requirements;
  o The first line of defense to prevent and protect against fraud, waste, abuse, and mismanagement;
  o A representation of a series of actions or processes that occur regularly throughout operations, whether they are administrative, operational, or financial,
  o A representation of an integral part of every system management uses to regulate operations.
  o Embedded in specific sets of policies, procedures and activities designed to meet a Component’s overall objectives
  o Automated or manual
  o A means by which an organization’s resources are directed, monitored, and measured
  o Formal system of checks and balances
The Internal Control Program is:

• Mandatory for all Components within the Department,

• Dependent upon a formal **communication framework** to include the assessable unit managers, MICP Coordinator, senior managers and the Component Head,

• Formalized strategy to evaluate, adjust and provide a level of assurance regarding the effectiveness of the internal controls, and

• Relies upon assessable units, controls, risk and mission objectives to ensure continuous effective and efficient controls are in place, changes in both internal and external forces require continuous reviews and revision to controls, to ensure recent changes in such forces do not result in material weaknesses.
The Internal Control Program:
- The following elements assist in the development and maintenance of an effective program:

  o Establishing a clear tone from the leadership, commonly referred to and throughout this document as a “Tone at the Top”.

  o A description of the Risk Assessment Methodology to include how the Component determines risks and what is performed to ensure resources are applied to the higher risk areas.

  o A description of how the Component Monitors and Evaluates Internal Controls is as important as the testing and evaluations.

  o How deficiencies and corrective actions are tracked.

  o Training efforts must support effective and efficient operations.

  o Appointing a Primary and Alternate MICP Coordinator
Purpose of the Communication Framework is to:

1. Ensure short-term and long-term mission requirements of the Component are effectively communicated through the organization for proper alignment with the Component’s short-term and long-term mission priorities and associated risk,

2. Provide leadership a direct communication link to those responsible for specific operational, program and administrative processes, and procedures in order to be appraised of potential risks if warranted.

In Establishing the Control Program:

- All levels of leadership must demonstrate commitment to excellence in the workplace.
- Management must clearly define areas of authority and responsibility and appropriately delegate the authority and responsibility throughout the agency.
The Committee of Sponsoring Organizations (COSO) Integrated Risk Management Framework consists of **five interrelated components:**

- **Control Environment** – Organizational structure and culture created, by management and employees, influencing the sustainability of an organization's effective internal control.
- **Risk Assessment** – Identification and analysis of risks to the achievement of program objectives and is used to assist in the management of the risks.
- **Control Activities** – Policies and procedures that help ensure necessary actions are taken to address risks related to the achievement of the program’s objectives.
- **Information and Communication** – Encompasses the activities required to identify and communicate information in a timeframe that enables employees to carry out their responsibilities and take actions.
- **Monitoring** – Process to assess the quality of the internal control system’s performance over time, including regular management and supervisory activities.
The COSO Integrated Risk Management Framework consists of five interrelated components. They are: Control Environment, Risk Assessment, Control Activities and:

- Human Capital and Information and Communication
- Information and Communication, and Monitoring
- Human Capital and Monitoring
- Organizational Alignment and Leadership and Information Management

This is a self assessment. It does not count against your overall score. Please select your answer and click submit.
To Properly Conduct a Risk Assessment:

- Understand the Component’s missions and objectives;
- Develop a preliminary understanding of critical risks and processes, and their alignment with the Component’s strategic plan, missions, and objectives;
- Create a customized risk universe framework to categorize key risks that reflects the risks that impact the Component;
- Assess, prioritize, and validate risks;
- Scope the risk assessment with input from all stakeholders, preferably management;
- Report the results of the risk assessment to the Commander/Principal and use the results to develop a strategy for reviewing and assessing them;
- Determine current risk monitoring activities; and
- Understand the effectiveness of entity-level controls, such as:
  - Policies and procedures,
  - Code of conduct,
  - Segregation of duties,
  - Continuity and disaster recovery plans for all primary data centers and business unit facilities, which are typically imbedded in the Continuity of Operations Plans (COOP), and
  - Fraud prevention/detection programs

Risk assessments require identifying, analyzing, and managing both internal and external risks that may affect the ability to achieve the organization mission and goals.
**Types of Risk:**

**Inherent Risk** – events or conditions that exist which could negatively impact mission objectives, assuming no controls are in place.

**Control Risk** – when controls are in place but fail to prevent or detect identified inherent risks.

**Residual Risk** – includes risks that exist after management has responded to and modified controls already in place and results in the need to possibly incorporate additional controls.

**Fraud Risk** – when fraud or misuse of assets cause resources to be wasted, which prevents the accomplishment of the mission. While controls may be put into place no program is developed to eradicate neither fraud nor can it be expected that fraud will be detected; however, understanding that fraud exists is critical.

**There are three simple questions regarding risk:**

1. Have all the risks been identified that might clearly impact the mission or objectives,
2. Are controls in place to cover or mitigate the risk, and
3. Are the controls in place or mitigation steps working?
Once management has identified risks within the organization, the risk must be assessed. The likelihood represents the probability of occurrence and the impact is the consequence of occurrence. There are many ways to determine which risks require more attention. A simple risk assessment must clearly identify or categorize risks as low, medium or high. Low risk do not materially impact the organization, medium risks may materially impact the organization; however high risks do impact the organization in a material manner and lead to failures in a myriad of ways. The following is one of several charts that may be used to identify risk and is not required, but strongly encouraged.

<table>
<thead>
<tr>
<th>Likelihood of Occurrence</th>
<th>Consequence of Impact To Organization</th>
</tr>
</thead>
<tbody>
<tr>
<td>Almost Certain</td>
<td>Medium</td>
</tr>
<tr>
<td>Likely</td>
<td>Medium</td>
</tr>
<tr>
<td>Possible</td>
<td>Low</td>
</tr>
<tr>
<td>Unlikely</td>
<td>Low</td>
</tr>
<tr>
<td>Remote</td>
<td>Low</td>
</tr>
<tr>
<td></td>
<td>Insignificant</td>
</tr>
</tbody>
</table>
DoD Components should consider available sources of management evaluation activity, such as:

- Audits of financial statements required by the Chief Financial Officers Act
- Component Inspector General (IG) or Audit Service Findings
- IG, DoD Reports and Reviews
- Most significant MICP Accomplishments achieved during the current fiscal year
- Lean Six Sigma and other management initiatives
- GAO Reports and Reviews, and GAO list of High Risk areas
- Review of OSD Functional Proponent Proposals (e.g., Systemic Weaknesses)
- Management knowledge gained from daily operations
- Management reviews conducted to assess internal controls
- Information Technology Initiatives
- Other reviews or reports relating to agency operations
- Program evaluations
- Productivity Statistics
- DoD Hotline complaints
- Quality Assurance Reviews
- Congressional Reviews and Hearings
- Reviews and reports required by Government Performance and Results Act
- Evaluations and reports required by the Federal Information Security Management Act and OMB Circular A-130, Management of Federal Information Resources
- Single Audit reports for grant-making agencies.

The annual assessment of internal controls should not be isolated from daily operating and management activities.
True or False: The annual assessment of internal controls should be isolated from daily operating and management activities.

- [ ] True
- [ ] False
DoD Audit Readiness
Phases in "The Journey“:

**Phase 1:**
- Chief Financial Officers (CFO) Act of 1990
- Government Management Reform Act (GMRA) of 1994
- Federal Financial Management Improvement Act (FFMIA) of 1996
- Rationalizing DoD Finance/Accounting (DFAS)
- Military Service Audit Pilots

**Phase 2:**
- Business Enterprise Architecture (BEA)
- Enterprise Transition Plan (ETP)
- Financial Improvement and Audit Readiness (FIAR) / Component Financial Improvement Plans (FIPs)
- Setting… and re-setting target completion dates

**Phase 3:**
- Streamlined Priorities – Budgetary Resources & Critical Asset Existence/Completeness
- Implementation of Major Systems Modernization Projects
- Developing a Cost-Effective End Game Strategy
OMB Circular A-123, Appendix A requirements and the FIAR Methodology

- The December 2011 FIAR Guidance merged OMB Circular A-123, Appendix A requirements into the FIAR Methodology, resulting in compliance with both the CFO Act and OMB A-123, Appendix A.

- All Financial Statement Reporting Entities must follow the FIAR Methodology, to include completing key tasks, activities, and work products. In addition, each DoD reporting entity must submit the following:
  - ICOFR and Internal Control over Financial Systems SOA memorandum
  - Summary Corrective Action Plans (CAPs) for each identified material weakness (if applicable)

Note: Internal control testing must be performed on an annual basis. Therefore, financial statement reporting entities must continue to perform the related procedures each year even after reporting entities have attained an audit ready state.
Success Requires Attention in Three Areas:

People
- Focus on providing our people the tools to succeed
- Push ourselves and our peers to be better
- People are the solution not only technology
- Take ownership and responsibility

Process
- Change the way we do business to include controls needed for audit
- Work towards what is reasonable to achieve reporting goals not always current standards

Technology
- Overcome technology impediments such as too many systems in end-to-end process

Citizens Demand and Deserve Sound Financial Reports and Internal Controls
Financial Systems & Financial Reporting Requirements
The following Components are required to submit an Annual SoA for Operations, Financial Reporting, and Financial Systems Control:

- Army
- Air Force
- Navy
- Chemical Biological Defense Program
- Defense Advanced Research Projects Agency
- Defense Technical Information Center
- Defense Commissary Agency
- Defense Contract Audit Agency
- Defense Contract Management Agency
- Defense Finance and Accounting Service
- Defense Health Agency
- Defense Information Systems Agency
- Defense Intelligence Agency
- Defense Logistics Agency
- Defense Security Cooperation Agency
- Defense Security Service
- Defense Threat Reduction Agency
- DoD Education Activity
- Joint Improvised Explosive Device
- Military Retirement Fund
- Missile Defense Agency
- National Geospatial – Intelligence Agency
- National Reconnaissance Office
- National Security Agency
- Office of the Inspector General, DoD
- Office of the Under Secretary of Defense (Comptroller)
- Office of the Under Secretary of Defense (Intelligence)
- Office of the Under Secretary of Defense (Personnel and Readiness)
- Office of the Under Secretary of Defense (Policy)
- United States Special Operations Command
- United States Transportation Command
- Washington Headquarters Services

AT&L organizations and Defense Agencies are highlighted in blue.
Applies to financial management systems of all agencies

Conduct a Financial System assessment and report results annually in the SOA

FFMIA requires that the Component’s IFMS be compliant with (substantial compliance requirements):
- Federal system requirements;
- Federal accounting standards; and
- U.S. Standard General Ledger at the transaction level

OMB Circular No. A-127 – Prescribes Policies and Standards for Executive Departments and Agencies to Follow Concerning Their Financial System
http://www.whitehouse.gov/omb/circulars_a127/
Compliance with Federal Financial Management Improvement Act

<table>
<thead>
<tr>
<th>Substantial Compliance Requirements</th>
<th>Reporting Entity</th>
<th>Auditor</th>
<th>Reason for Non-Compliance</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. System Requirements</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>2. Accounting Standards</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>3. USSGL at Transaction Level</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Head of Reporting entity is Responsible for:**
- Completing table and reporting TAB A (Tabs explained on slide 62) in Annual Statement of Assurance.
- Preparing, maintaining, and executing an IFMS improvement plan.
- Providing assurance in the Statement of Assurance.
Based on Draft OUSD(C) Guidance: Requirements for Entities that Participate in Financial Reporting

For FY 2014:
In contrast with prior years, DoD Component leadership will submit one consolidated SOA to the SecDef, with a copy to the Financial Improvement and Audit Readiness Directorate, that asserts to the following four areas:

- The effectiveness of the operational and administrative controls relevant to all mission-essential functions throughout their Component as of September 30;
- The effectiveness of the internal controls over financial reporting (ICOFR) and financial systems (ICOFS) as of June 30;
- Compliance with applicable laws and regulations in each of the above areas; and
- Financial information systems are compliant with the Federal Financial Management Information Act (FFMIA) of 1996 (Public Law 104-208).

DoD Service Providers are encouraged to provide its customers with an assurance statement asserting to the effectiveness of its internal controls over financial reporting and financial systems as of June 30.

Beginning in FY 2015:
Service Providers will be required to provide a SOA to their customers, to provide adequate time for the Reporting Entity to assess the impact of applicable control weaknesses and information/financial systems.
Statement of Assurance Package
Cover Memo signed by Director - Statement of Reasonable Assurance on Internal Controls
• Unqualified statement of reasonable assurance (no material weaknesses) OR
• Qualified statement of reasonable assurance (with material weaknesses) OR
• No assurance (pervasive weaknesses)

Tab A-1: Description of the Concept of Reasonable Assurance and How the Evaluation was Conducted
• Assessment of Acquisition Functions
• Reporting on Internal Controls Over Financial System Process (ICOFS)

Tab A-2: Significant MICP Accomplishments

Tab B-1: Operational Material Weaknesses
Tab B-2: Operational Corrective Action Plans and Milestones

Tab C: Financial Reporting / Integrated Financial Management System Material Weaknesses / Corrective Actions

Tab D: DoD Assessment of Internal Controls over Acquisition Functions Template
| Statement of Reasonable Assurance on Internal Controls |
| Description of the Concept of Reasonable Assurance and How the Evaluation was Conducted |
| Operational Material Weakness |
| DoD Assessment of Internal Controls over Acquisition Functions Template |

Match the Sections of the Statement of Assurance package to their contents, then select submit.
Tab A, How the Evaluation was Conducted:

Describe how the organization conducted its annual assessment of internal controls and arrived at its conclusion on reasonable assurance.

- **Assessment of Acquisition Functions**

Summarize actions to strengthen internal controls, improve execution of the MIC Program and related improvements (the OUSD (Comptroller) guidance provides a template for this).

The Reporting Entity should provide an overall introductory summary statement to accompany and explain the [associated] table regarding its compliance with FMFIA.

Cite any Internal Control Improvements / Accomplishments, such as correcting a control deficiency or improving a control situation. The format is simple:

- Description of Issue (a brief title)
- Improvements / Accomplishments (describe in bullet form)
TAB A, Assessment of Acquisition Functions

Complete the DoD Assessment of Internal Control over Acquisition Functions Template

• DoD Components are required to submit the initial completed DoD template; only revised templates are required to be re-submitted.

Determine if there are new deficiencies or weaknesses and develop a corrective action plan (CAP)

• Report the CAP in the annual Statement of Assurance in accordance with FMFIA and annual OUSD (Comptroller) guidance ... just as it’s done for all other (non-financial reporting) weaknesses.

Summarize the results of the completed assessment and briefly explain how the DoD and OMB templates were used to determine deficiencies and weaknesses in TAB A of the SOA.

Components will use the DoD Template and the OMB Template to evaluate acquisition functions
**Description of Issue:** The USD(AT&L) established BBP initiatives, which included initiatives regarding utilization of small business concerns. Initiatives include evaluating small business utilization in source selections, including evaluation of small business performance in past performance criteria for source selections, and SBP review of acquisition strategies and participation in peer reviews for services acquisitions exceeding $1B.

**Accomplishment:**
- SBP now reviews all acquisition strategies and participates in peer reviews for acquisitions of services exceeding $1B to ensure the BBP initiatives are implemented and small business are utilized to the maximum extent practicable. This had concrete effects such as higher small business subcontracting goals, improved tracking of subcontracting achievements, and removal of provisions that negatively affect small business subcontractors. In fact, SBP now also reviews acquisition strategies for MDAP that exceed $1B.
Tab A, Example of FY 2013 Internal Control Accomplishment provided by Acquisition Resources and Analysis (ARA):

**Description of Issue:** Financial Reporting and valuation of Military Equipment (ME). Process and controls to account for the quantity and value of military equipment needed to be made effective.

**Accomplishment:**
- Conducted a ME valuation pilot with the United States Special Operations Command (USSOCOM) in which several valuation methodologies were piloted to determine the most efficient valuation methodology which meet federal accounting standards. The USSOCOM Pilot resulted in the development of valuation guidance that is Statements of Federal Financial Accounting Standards (SFFAS) No. 6 and No. 35 compliant and will be utilized by the Department moving forward to meet audit readiness goals.
- Completed a full-scope (to include General Equipment (GE) and ME) capitalization threshold study for the Department to assess and set the appropriate capitalization threshold to support financial reporting and management objectives while reducing reporting workload.
Significant accomplishments will be reported in the Management's Discussion and Analysis (MD&A) section of the Department’s Annual Financial Report (AFR). Provide details on accomplishments achieved in the execution of the MICP since you issued the previous SOA.

**Internal Control Reporting Category:** One of the internal control categories identified in Enclosure 5, DoDI 5010.40

**Description of the Issue:** A few sentence describing the internal control issue/risk to the organization

**Accomplishment:** Bullets describing how the organization became more effective or efficient in operations, improved fiscal stewardship, or complied with applicable laws and regulations
Conducting an IC Assessment and Developing a Corrective Action Plan for Identified Material Weakness

- Review Inventory of Controls
  - Are there Any New, Obsolete or Revised Controls?
    - Yes: Update Controls
    - No: Is this due for a vulnerability or risk assessment?
      - Yes: Fill Out Vulnerability Assessment
      - No: Testing Complete Monitor Based on Risk Level
        - Complete Internal Control Evaluation
          - Are Corrective Actions Needed?
            - Yes: Develop Corrective Action Plan and Report in the Statement of Assurance
            - No: Complete Internal Control Evaluation
Tab B, Material Weaknesses and Tab C, Financial Reporting Weaknesses:

Managers are encouraged to report material weaknesses.

- Reporting material weaknesses reflects positively on the organization’s commitment to address management problems.
- Reporting material weaknesses could help others avoid problems.

Some considerations:

Whether a weakness is material is a management judgment.

- Exception: “significant deficiencies” identified under the Federal Information Security Management Act.

Designating an internal control deficiency as a weakness in an audit report does not necessarily mean it must be reported as a material weakness in the Statement of Assurance.

- However, OMB Circular A-123 indicates management should give serious consideration to the views of the Inspector General.

Once corrected and closed, a material or systemic weakness that is subsequently re-opened and reported again should not be re-titled.

- It should retain the same title as the original weakness but indicate a new year identified.

Organizations should resolve material weaknesses as quickly as possible and ensure the targeted correction dates are met.
Tab B, Material Weaknesses and Tab C, Financial Reporting Weaknesses:

Be careful in describing the scope of a material weakness.
- The scope of the weakness description and the scope of the corrective actions must be in sync.
- Example: Defining the weakness in broad terms, but providing corrective actions that focus only on one particular aspect is inappropriate and can lead to questions about whether the weakness has really been resolved.

It may be preferable to address several related problems in one material weakness, but don’t overstate the dimensions of the weakness.
- Weaknesses defined too broadly are very difficult to resolve and usually result in missing the target correction date.
- Do not bundle related material weaknesses solely to reduce the number of material weaknesses reported.
Tab C, Financial Reporting Material Weaknesses:

The Financial Reporting statement of assurance is based on a year-long process of actions prescribed by OMB and OUSD (C).

OUSD (C) guidance directs the:

- Financial Statement Reporting Entities (FSREs) that must provide an ICOFR statement of assurance,
- Financial implementation areas each FSRE must assess,
- Process to be used for this assessment, and
- Schedule of specific deliverables.

The Financial Reporting statement of assurance:

- Is included in the Overall Statement of Assurance.
- Covers a one year period from July 1 through June 30.
- Can be unqualified, qualified or a statement of no assurance.

For OUSD (AT&L), the above guidance applies only to the Chemical and Biological Defense Program, General Fund and Defense Technical Information Center.
Material Weakness Tips:

• Provide a concise description of the material weakness.
• Be sure it describes a problem with internal controls.
• Don’t report an unfunded requirement as a material weakness.
• Limit a material weakness to three pages or less.
• Use the active voice – avoid use of the passive voice.
• Minimize use of technical jargon – write for the general public.
• Minimize the use of acronyms and spell out when first used.
• If corrective action is not complete when the Statement of Assurance is signed, report the material weakness as uncorrected – even if you expect to correct it in the 4th quarter.
Tab B-1: Operational Material Weakness(es) Reporting Template:

NOTES:
(a): Internal Control Reporting Category: Defined in Enclosure 5, DoDI 5010.40.

(b): Description of Material Weakness: Provide a brief description, approximately 50-75 words in length, of the overall weakness and its impact to the organization.

(c): Targeted Correction Year: Expected date of resolution. If this date has changed for prior period material weaknesses, provide a brief explanation as to why the date changed in the ’Detailed Corrective Action Plan’ section in Tab B-2.

(d): Page #: The first page number of the corrective action plan and milestones (Tab B-2).

(e): First Year Reported: The fiscal year in which this material weakness was first reported in your SOA. This date will not change once the weakness has been identified.
This detailed weakness will be maintained by the AT&L MICP Manager

Tab B-2: Operational Corrective Action Plans and Milestones

CORRECTIVE ACTION PLANS AND MILESTONES

Detail of Uncorrected and Corrected Material Weaknesses, Corrective Action Plans and Milestones Template

a. Internal Control Reporting Category: Defined in Enclosure 5, DoDI 5010.40.

b. Targeted Correction Date: Expected date of resolution. If this date changes for prior period material weaknesses, provide a brief explanation as to why the date changed in the “Detailed Corrective Action Plan” section in Tab B-2.

c. Description of Material Weakness: Provide a brief description, approximately 50 – 75 words in length, of the overall weakness and the impact to the organization.
Material Weakness Examples – Title and Descriptions:

**Internal Controls over Accountability and Management of DoD Personal Property Used on Contracts.**
The Department has not properly trained the staff or enabled sufficient tools to address the accountability requirements in place to adequately oversee and execute personal property transactions. Audit reports have consistently identified a lack of accountability concerning personal property for which the DoD has title but not immediate physical control, typically manifested in property used on contracts.

**Internal Controls over Contingency Contracting.**
The acquisition workforce is not adequately staffed, trained, structured, or empowered to meet the needs of the 21st Century deployed Warfighters. Audit reports conclude that internal controls to mitigate risks in the contracting process were ineffective or non-existent. Additionally inadequate surveillance of service contracts due to a significant shortfall of Contracting Officer’s Representatives (CORs) affected DoD’s oversight capability and left the Department vulnerable.
The Importance of Your Role:

Your input will support the USD (AT&L)’s Statement of Assurance to the Director, Administration and Management.

Your systemic weaknesses – and many of your material weaknesses – will be included in:
• The OSD Statement of Assurance to the SecDef.
• The DoD Agency Financial Report to the OMB and the Congress.

Your systemic weaknesses address the most complex internal control problems in DoD. Their resolution represents a major improvement in controls.
FY 2014 SoA/MIC Program for AT&L and Defense Agencies
The USD(AT&L) memorandum, “Initial Guidance from the Acting USD(AT&L)”, dated October 7, 2011, list USD(AT&L)’s priorities. The FY 2014 SOA IC accomplishments, should align with the following six priorities:

- Supporting Forces who are Engaged in Overseas Contingency Operations
- Achieving Affordable Programs
- Improving Efficiency
- Strengthening the Industrial Base
- Strengthening the Acquisition Workforce
- Protect our Future
Requirements and Timeline – AT&L Organizations

**Tab A**
- ARA / P&EP will draft narrative “Description of the Concept of Reasonable Assurance and How the Evaluation was Conducted.”
- In support of the narrative, the OUSD (AT&L) staff must submit Internal Control Accomplishments that align with any of the 6 AT&L priorities

**Tabs B – C (Material and Systemic Weaknesses)**
- OUSD (AT&L) staff must submit material and systemic weaknesses (updated weaknesses and new weaknesses)
  - Submit a detailed and summary corrective action plan for each material weakness identified.

**Tab D**
- DoD Template on the Acquisition Functions

**Helpful Hints**
- Ensure accomplishments are noted and fully described.
- Note both material weaknesses and reportable conditions.
- Use of Lean Six Sigma and other initiatives.
- Provide detailed discussion based upon foundation of documentation of how material weaknesses were identified and resolved (internal versus external).

*Inputs Due May 30, 2014*
Requirements and Timeline – AT&L Organizations

**Draft AT&L Statement of Assurance Package**

- ARA/P&EP will consolidate inputs and prepare SoA document, including Cover Memo.
  - If clarifications or edits are needed, we will contact you.

- Final Package will be entered into SACCP for Formal Coordination with Principal Staff Assistants (PSAs).
  - PSAs will be asked to sign Coordination Sheet containing a statement appropriate to the PSA.
  - Coordination to begin about **June 13, 2014**.
Coordination on Defense Agencies SoAs
Coordination on Defense Agency Statements of Assurance

D, ARA coordinates on Defense Agency Statements of Assurance

- Per PDUSD (AT&L) Memo, Designation of Senior Assessment Team (SAT) Member for AT&L, dated March 29, 2010.
- Defense Agency Point of Contact (POC) is to send signed SoA in both hard copy and via e-mail to the corresponding AT&L Principal Coordination (POC) by July 25, 2014.
Coordination on Defense Agency Statements of Assurance

AT&L Principal Coordination POC is to obtain their AT&L Principal’s concurrence on the Agency’s SoA.

- Use Coordination Sheet (to be provided by ARA / P&EP).
- After obtaining AT&L Principal’s coordination, contact Agency POC for pickup.

Agency POC is responsible for obtaining SoA package from AT&L Principal Office and delivering it to Pentagon, Room 3C949A and place it in the ARA / P&EP Mailbox OR emailing package to RSSdd-OSD-ATL.MICP@osd.mil.

- Package must be submitted to ARA by August 8, 2014.

D, ARA will provide coordination by August 29, 2014.
Coordination on Defense Agency Statements of Assurance

The Agency POC is responsible for:

- Submit both Microsoft Word and PDF files of its signed SOA via email to the Managers’ Internal Control Program (MICP) account at RSSdd-OSD-ATL.MICP@osd.mil.

- The electronic versions of each Component SOA are required no later than the first Wednesday following Labor Day.

OUSD (Comptroller) will log the date of the SoA submittal
Coordination on Defense Agency Statements of Assurance

ARA / P&EP will:
• Obtain Director, ARA coordination, and
• Then notify the Agency POC that the coordinated Statement of Assurance is ready for pickup.

ARA / P&EP will send via e-mail a scanned version of each Cover Memo showing the Coordination to:
• Appropriate Agency and AT&L Principal Coordination POCs, and
• The DoD Managers’ Internal Control Program Manager in OUSD (Comptroller).
Requirements and Timeline Summary
Due Dates:

Internal Control Accomplishments and
All weaknesses, existing and new – \textbf{May 30, 2014}

\textbf{Final Statement entered into SACCP for Formal Coordination with Principal Staff Assistants (PSA).}

PSAs will be asked to sign Coordination Sheet containing statement appropriate to them. Coordination to begin about \textbf{June 13, 2014}
 Defense Agencies SoA Summary

Defense Agency POC is to send **signed** SoA in both hard copy and via e-mail to the corresponding AT&L Principal Coordination POC by **July 25, 2014**.

AT&L Principal Coordination POC is to obtain their AT&L Principal’s concurrence on the Agency’s SoA.

Package must be submitted to P&EP by **August 8, 2014**.

D, ARA will provide coordination by **August 29, 2014**.
OUSD (AT&L) POCs:

Rosie Heraud  
(703) 697-0696  
Rosana.M.Heraud.civ@mail.mil

Freddie Anderson  
(703) 697-0767  
Freddie.D.Anderson.ctr@mail.mil
Congratulations:

You have completed the training.

Please click on the "Return to Course Menu" link in the upper right hand corner as depicted in the image below:

This will take you back to the Course Menu, next you will need to print your certificate.