INTERNAL CONTROLS IN THE REAL WORLD

The Good, The Bad and the Scary

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Superior Accounting Conference 2017

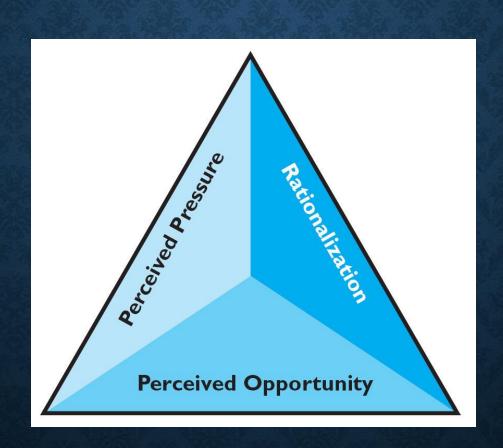
WHO I AM

- My Background—
 - Corporate positions as Accounting Department Manager, Controller, CFO
 - Health Care Executive in Insurance and in Physician Practice Management
 - Academic Department Administrator in Medical School (MSU-CHM)
 - Small Business Owner Retail Flooring and Franchise
 - Fraud Examiner and College Professor

WHAT WE WILL DISCUSS TODAY

- Creating the culture of honesty and openness
- Eliminating the opportunities for fraud
- What organization (structure) helps to minimize asset misappropriations
- Proactive? Must be!!
- Involve the entire organization in the prevention of fraud

FRAUD TRIANGLE



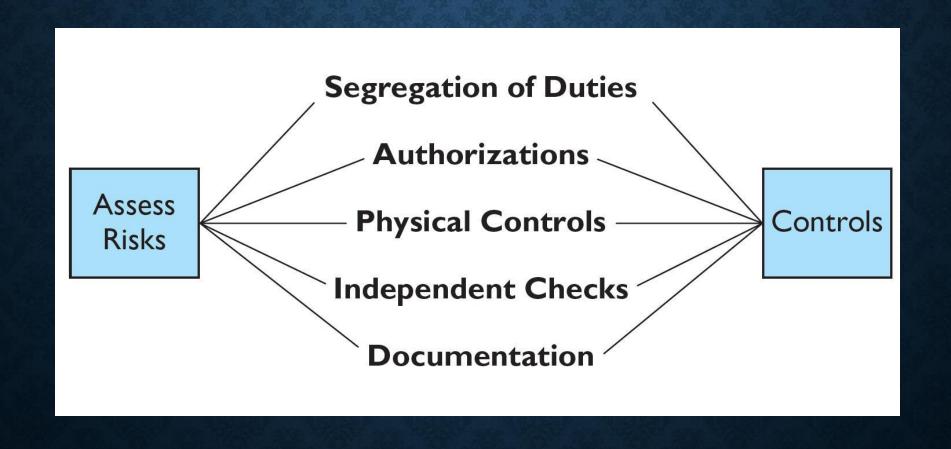
ELIMINATE OPPORTUNITIES

- 1. Have good internal controls
- 2. Discourage collusion
- 3. Monitor employees and provide a whistle-blowing system
- 4. Create an expectation of punishment
- 5. Conduct proactive auditing

INTERNAL CONTROLS

TYPE OF CONTROL	CONTROL ACTIVITIES
Preventive controls	1. Segregation of duties
	2. System of authorizations
	3. Physical safeguards
Detective controls	1. Independent checks
	2. Documents and records

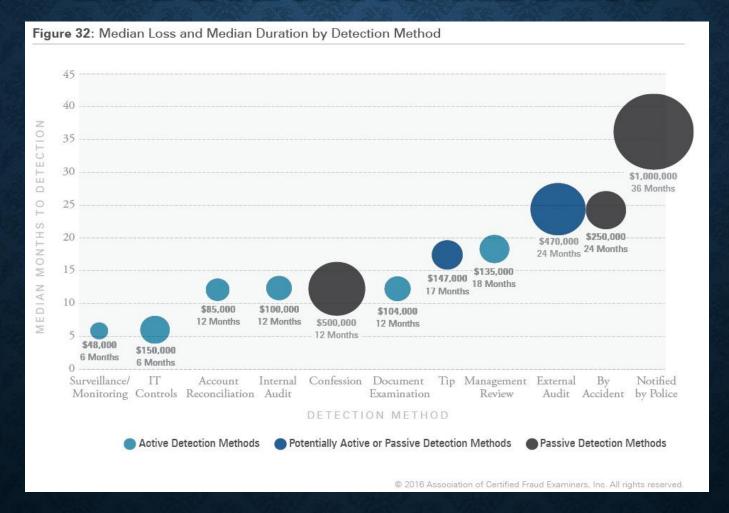
BASICS OF INTERNAL CONTROLS



STANDARDIZED FRAMEWORK

- COSO's Internal Control Framework
- 1. A good control environment
- 2. A good accounting system
- 3. Good control activities
- 4. Monitoring
- 5. Good communication and information

MEDIAN LOSS AND MEDIAN DURATION BY DETECTION METHOD



EMPLOYEES ARE OUR WEAKEST LINK

- Collusive frauds have increased probably because of...
 - Increased complexity of business
 - Increased frequency of supplier alliances
- Suggested method of discouraging collusion:
 - Have a "right-to-audit" clause on the back of all purchase invoices

WHISTLE-BLOWER/HOT LINE SYSTEMS

- Effective systems have the following:
- 1. Anonymity
- 2. Independence
- 3. Accessibility
- 4. Follow-up

FEAR IS A MOTIVATOR!!

• One of the greatest deterrents to dishonesty is fear of punishment.

• Real punishment involves having to tell family members and friends about the dishonest behavior.

 A strong prosecution policy that is well publicized lets employees know that dishonest acts will be harshly punished.

SAS 99 AND PROACTIVE AUDITING

- ➤ Good fraud auditing involves four steps:
- 1. Identify fraud risk exposures
- 2. Identify the fraud symptoms of each exposure
- 3. Build audit programs to proactively look for symptoms and exposures
- 4. Investigate fraud symptoms identified

STATEMENT ON AUDITING STANDARDS NO 99

Consideration of Fraud in a Financial Statement Audit

- Brainstorming the risks of fraud
- Discussing with management about awareness of fraud
- Using unpredictable audit tests
- Requiring on every audit procedures responsive to detecting management override

PREVENTING FRAUD IN ONE HANDY CHART

3. Implementing employee assistance programs

5. Proactive fraud auditing

Creating a culture of honesty, openness, and assistance

I. Having good internal controls

Eliminating fraud opportunities

2. Creating a positive work environment

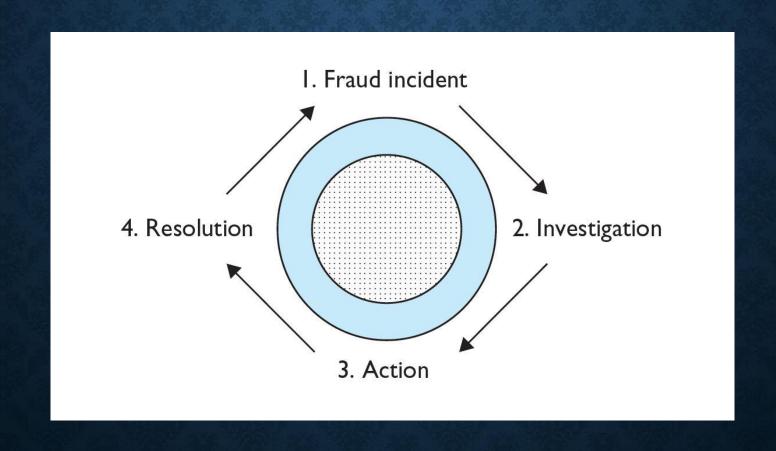
4. Creating an expectation of punishment

2. Discouraging collusion between employees and others and informing vendors of company policies

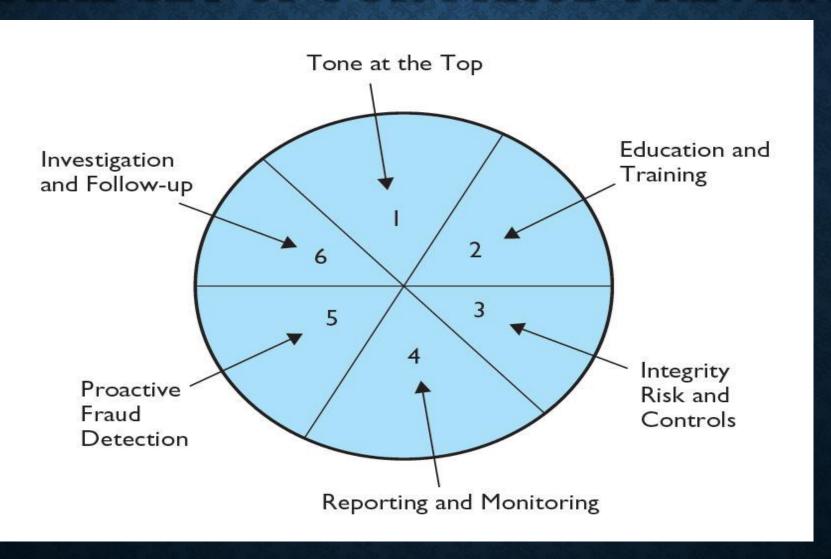
I. Hiring honest people and providing fraud awareness training

3. Monitoring employees and implementing a hotline

TODAYS TYPICAL WORK FLOW



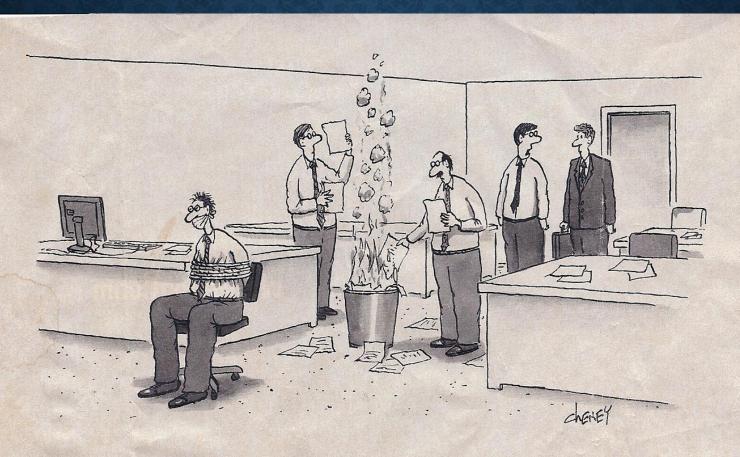
IDEAL SET UP FOR FRAUD PREVENTION



DISCUSSION

- What have you experienced in your career? Which control would have been most helpful in spotting or pursuing the misappropriation?
- How do we reduce worker stress/schedule jams that lead to compromised systems?
- Is leniency a good solution for a 'good employee'?
- Does top management care? Of course they do! Do they trust the 'system' to work? Yes, but rarely follow through on concerns...
- Continuous education of all levels of staff will drive the culture to where we all want it to be.

IF ALL ELSE FAILS...



"First rule — what happens in accounting stays in accounting."

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