# 2021-22 Internal Control Questionnaire and Assessment

Bureau of Financial Monitoring and Accountability Florida Department of Economic Opportunity



## TABLE OF CONTENTS

OVERVIEW	
Control Environment	
Risk Assessment	
Control Activities	12
Information and Communication	14
Monitoring Activities	16
Attachment A	19

### **OVERVIEW**

# Introduction and Purpose

The Internal Control Questionnaire and Assessment (ICQ) was developed by the Department of Economic Opportunity (DEO), Bureau of Financial Monitoring and Accountability, as a self-assessment tool to help evaluate whether a system of sound internal control exists within the Local Workforce Development Board (LWDB). An effective system of internal control provides reasonable assurance that management's goals are being properly pursued. Each LWDB's management team sets the tone and has ultimate responsibility for a strong system of internal controls.

The self-assessment ratings and responses should reflect the controls in place or identify areas where additional or compensating controls could be enhanced. When the questionnaire and the certification are complete, submit them to DEO by uploading to SharePoint.

## Definition and Objectives of Internal Controls

Internal control is a process, effected by an entity's board of directors, management and other personnel, designed to provide "reasonable assurance" regarding the achievement of objectives in the following categories:

- Effectiveness and efficiency of operations
- Reliability of financial reporting
- Compliance with applicable laws and regulations

The concept of reasonable assurance implies the internal control system for any entity, will offer a reasonable level of assurance that operating objectives can be achieved.

#### Need for Internal Controls

Internal controls help to ensure the direction, policies, procedures, and practices designed and approved by management and the governing board are put in place and are functioning as designed/desired. Internal controls should be designed to achieve the objectives and adequately safeguard assets from loss or

August 20, 2021 Page 3 of 19

unauthorized use or disposition, and to provide assurance that assets are used solely for authorized purposes in compliance with Federal laws, regulations, and program compliance requirements. Additionally, Title 2, Part 200, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards, § 200.303 Internal controls, states:

#### The non-Federal entity must:

- (a) Establish and maintain effective internal control over the Federal award that provides reasonable assurance the non-Federal entity is managing the Federal award in compliance with Federal statutes, regulations, and the terms and conditions of the Federal award. These internal controls should be in compliance with guidance in "Standards for Internal Control in the Federal Government" issued by the Comptroller General of the United States and the "Internal Control Integrated Framework", issued by the Committee of Sponsoring Organizations of the Treadway Commission (COSO).
- (b) Comply with Federal statutes, regulations, and the terms and conditions of the Federal awards.
- (c) Evaluate and monitor the non-Federal entity's compliance with statute, regulations and the terms and conditions of Federal awards.
- (d) Take prompt action when instances of noncompliance are identified including noncompliance identified in audit findings.
- (e) Take reasonable measures to safeguard protected personally identifiable information and other information the Federal awarding agency or pass-through entity designates as sensitive or the non-Federal entity considers sensitive consistent with applicable Federal, state and local laws regarding privacy and obligations of confidentiality.

#### What Internal Controls Cannot Do

As important as an internal control system is to an organization, an effective system will not guarantee an organization's success. Effective internal controls can keep the right people, such as management and the governing board members, informed about the organization's operations and progress toward goals and objectives. However, these controls cannot protect against economic downturns or make an understaffed entity operate at full capacity. Internal controls can only provide <u>reasonable</u>, <u>but not absolute</u>, <u>assurance</u> the entity's objectives can be met. Due to limitations inherent to all internal controls systems, breakdowns in the internal control system may be caused by a simple error or mistake, or by faulty judgments made at any

August 20, 2021 Page 4 of 19

level of management. In addition, controls may be circumvented by collusion or by management override. The design of the internal controls system is dependent upon the resources available, which means there must be a cost-benefit analysis performed as part of designing the internal control system.

#### Five Components of Internal Control

- **Control Environment** is the set of standards, processes, and structures that provide the basis for carrying out internal controls across the organization. The board of directors and senior management establish the tone at the top regarding the importance of internal controls and expected standards of conduct.
- Risk Assessment involves a dynamic and iterative process for identifying and analyzing risks to
  achieving the entity's objectives, forming a basis for determining how risks should be managed.

  Management considers possible changes in the external environment and within its own business
  model that may impede its ability to achieve objectives.
- Control Activities are the actions established by policies and procedures to help ensure that
  management directives mitigate risks so the achievement of objectives are carried out. Control
  activities are performed at all levels of the entity and at various stages within business processes, and
  over the technology environment.
- Information and Communication are necessary for the entity to carry out internal control responsibilities in support of achievement of its objectives. Communication occurs both internally and externally and provides the organization with the information needed to carry out day-to-day internal control activities. Communication enables personnel to understand internal control responsibilities and their importance to the achievement of objectives.
- Monitoring are ongoing evaluations, separate evaluations, or some combination of the two used
  to ascertain whether the components of internal controls, including controls to affect the principles
  within each component, are present and functioning. Findings are evaluated and deficiencies are
  communicated in a timely manner, with serious matters reported to senior management and to the
  board of directors.

## Makeup of the ICQ

Subsequent sections of this document emphasize the "17 Principles" of internal controls developed by the Committee of Sponsoring Organizations of the Treadway Commission (COSO) and presented in the

August 20, 2021 Page 5 of 19

Internal Controls – Integrated Framework. The five components of internal controls listed above are fundamentally the same as the five standards of internal controls and reflect the same concepts the "Standards for Internal Control in the Federal Government" utilizes.

The principles are reflected in groupings of questions related to major areas of control focus within the organization. Each question represents an element or characteristic of control that is or can be used to promote the assurance that operations are executed as management intended.

It should be noted that entities may have adequate internal controls even though some or all of the listed characteristics are not present. Entities could have other appropriate internal controls operating effectively that are not included here. The entity will need to exercise judgment in determining the most appropriate and cost effective internal controls in any given environment or circumstance to provide reasonable assurance for compliance with Federal program requirements.

# Completing the Document

On a scale of 1 to 5, with "1" indicating the greatest need for improvements in internal controls and "5" indicating that a strong system of internal controls already exists, select the number that best describes your current operating environment. Please provide details in the comments/explanations column for each statement with a score of 1 or 2. For questions requiring a narrative, please provide in the comments/explanations column.

## Certification of Self-Assessment of Internal Controls

Attachment A, includes a certification which should be completed and signed by the Executive Director, reviewed and signed by the Board Chair or their designee and uploaded to SharePoint.

August 20, 2021 Page 6 of 19

CONTROL ENVIRONMENT			ocedur	es, and	Proce.	sses	
		Weak	1	1		trong	
		1	2	3	4	5	Comments/Explanations
Principl	e 1. The organization demonstrates a commitment to integrity and	ethica	l value	s.			
1.	The LWDB's management and board of directors' commitment to integrity and ethical behavior is consistently and effectively communicated throughout the LWDB, both in words and deeds.						
2.	The LWDB has a code of conduct and/or ethics policy that has been communicated to all staff, board members, and outsourced service providers.						
3.	When the LWDB hires employees from outside of the organization the person is trained or made aware of the importance of high ethics and sound internal controls.						
Principl	e 2. The board of directors demonstrates independence from mana	gemer	nt and	exercis	es over	sight	
of the d	evelopment and performance of internal controls.						
4.	The board of directors define, maintain, and periodically evaluate the skills and expertise needed among its members to enable them to question and scrutinize management's activities and present alternate views.						
5.	The board of directors and/or audit committee maintains a direct line of communication with the board's external auditors and internal monitors.						
6.	The board of directors establishes the expectations and evaluates the performance of the chief executive officer or equivalent role.						

August 20, 2021 Page 7 of 19

	e 3. Management establishes, with board oversight, structures, repies and responsibilities in the pursuit of objectives.				
7.	Management reviews and modifies the organizational structure of the LWDB in light of anticipated changing conditions or revised				
	priorities.				
	Provide the date of last review.				
8.	Specific lines of authority and responsibility are established to ensure compliance with federal and state laws and regulations.				
9.	The LWDB management understands the importance of internal controls, including the division of responsibility.				
	e 4. The organization demonstrates a commitment to attract, deve als in alignment with objectives.				
10.	The LWDB provides training opportunities or continuing education to develop and retain sufficient and competent personnel.				
11.	The LWDB has succession plans for senior management and contingency plans for assignments of responsibilities important for internal controls.				
12.	For all employees, the LWDB regularly evaluates the performance of the employee and shares the results with the employee.				
	e 5. The organization holds individuals accountable for their inter of objectives.	in the			
13.	The LWDB has mechanisms in place to ensure that all required information is timely published to the website in a manner easily				

	accessed by the public in compliance with laws, regulations, and provisions of grant agreements.						
14.	The LWDB's structure and tone at the top helps establish and enforce individual accountability for performance of internal control responsibilities.						
15.	The LWDB has policies, processes and controls in place to evaluate and promote accountability of outsourced service providers (and other business partners) and their internal control responsibilities.						
RISK ASSESSMENT  Self-Assessment of Policies, Procedures, and Processes							
		Weak			Si	rong	
		1	2	3	4	5	Comments/Explanations
_	le 6. The organization specifies with sufficient clarity to enable the relating to objectives.	he iden	tificati	on and	assessi	ment	
16.	Management establishes a materiality threshold for each of its major objectives and identifies risk at each location where the LWDB conducts activities.						
17.	Management uses operational objectives as a basis for allocating the resources needed to achieve desired operational and financial performance.						
18.	The LWDB sets entity-wide financial reporting controls and assesses the risks that those controls will not prevent material misstatements, errors, or omissions in the financial statements.						

	7. The organization identifies risks to the achievement of its or risks as a basis for determining how the risks should be managed.	nd					
19.	Management ensures that risk identification considers internal and external factors and the potential impact on the achievement of objectives.  What measures are being taken to address the risk of cybersecurity in the organization?						
20.	The LWDB adequately and effectively manages risks to the organization and has designed internal controls in order to mitigate the known risks.  What new controls, if any, have been implemented since the prior year and which organizational risks do they mitigate?						
21.	The LWDB's risk identification/assessment is broad and includes both internal and external business partners and outsourced service providers.						
Principle objectives	8. The organization considers the potential for fraud in assessing.	ng risk	s to the	e achiev	vement	of	
22.	The LWDB periodically performs an assessment of each of its operating locations' exposure to fraudulent activity and how the operations could be impacted.						

August 20, 2021 Page 10 of 19

23.	The LWDB's assessment of fraud risks considers opportunities for unauthorized acquisition, use and disposal of assets, altering the reporting records, or committing other inappropriate acts.  Provide a narrative of the system/process for safeguarding cash on hand, such as prepaid program items (i.e. gas cards, visa cards) against unauthorized use/distribution.						
Principle of interna	9. The organization identifies and assesses changes that could controls	l signifi	cantly	impact	the sys	stem	
24.	The LWDB has mechanisms in place to identify and react to risks presented by changes in government, regulatory, economic, operating, or other conditions that could affect the achievement of the goals and objectives.						
25.	The most significant risks affecting the LWDB have been identified and controls are designed and implemented that mitigate risks.						
26.	Considering the most significant risks, have controls been designed and implemented that mitigate risks associated with each.						

August 20, 2021 Page 11 of 19

CONTROL ACTIVITIES			ocedur	sment es, and	Proces	sses	
		Weal		2	1	trong	C /E 1 /
		1	2	3	4	5	Comments/Explanations
_	<ol> <li>The organization selects and develops control activities that e achievement of objectives to acceptable levels.</li> </ol>	contri	bute to	the mi	tigatio	n of	
27.	The LWDB has a written business continuity plan which includes contingencies for business processes, assets, human resources and business partners, and is periodically evaluated and updated to ensure continuity of operations to achieve program objectives.						
28.	Controls employed by the LWDB include authorizations, approvals, comparisons, physical counts, reconciliations, supervisory controls and allowable use of funds.  What type of training is provided to program and administration staff to ensure the allowable use of funds?						
29.	The LWDB periodically (e.g., quarterly, semiannually) reviews system privileges and access controls to the different applications and databases within the IT infrastructure to determine whether system privileges and access controls are appropriate.						
	1. The organization selects and develops general control activiement of objectives.	ties ove	er techi	ology	to supp	ort	
30.	Management selects and develops control activities that are designed and implemented to restrict technology access rights to authorized users commensurate with their job responsibilities and to protect the entity's assets from external threats.						

CONTROL ACTIVITIES			f-Asses ocedur k		Proces	-	
		1	2	3	4	5	Comments/Explanations
31.	Management has identified the appropriate technology controls that address the risks of using applications hosted by third-parties.						
32.	The LWDB has considered the protection of personally identifiable information (PII), as defined in section 501.171(1)(g)1, F.S., of its employees, participants/clients and vendors, and have designed and implemented policies that mitigate the associated risks.						
	2. The organization deploys control activities through policies dures that put policies into action.	that es	tablish	what i	s expe	cted	
33.	The LWDB has policies and procedures addressing proper segregation of duties between the authorization, custody, and recordkeeping for the following tasks, if applicable: Prepaid Program Items (Participant Support Costs), Cash/Receivables, Equipment, Payables/Disbursements, Procurement/Contracting, and Payroll/Human Resources.						
34.	The LWDB has written procedures that minimize the time elapsing between the receipt of advanced funds and disbursement of funds as required by 2 CFR 200.305(b)(1).						

CONTROL ACTIVITIES			lf-Asses rocedur uk		Proce	•	
		1	2	3	4	5	Comments/Explanations
35.	The LWDB has processes to ensure the timely submission of required reporting (i.e. financial reports, performance reports, audit reports, internal monitoring reviews, or timely resolution of audit findings).						
36.	The LWDB has a records retention policy and has implemented internal controls to ensure all records are retained, safeguarded, and accessible, demonstrating compliance with laws, regulations, and provisions of contracts and grant agreements.						
INFORMATION AND COMMUNICATION							
INFOR	RMATION AND COMMUNICATION		lf-Asses rocedur ak		Proce	-	
		Pt Wea	ocedur k 2	es, and	Proces 3	sses Strong 5	Comments/Explanations
Principle:	RMATION AND COMMUNICATION  13. The organization obtains or generates and uses relevant, quing of internal controls.	Pt Wea	ocedur k 2	es, and	Proces 3	sses Strong 5	Comments/Explanations
Principle:	13. The organization obtains or generates and uses relevant, qu	Pt Wea	ocedur k 2	es, and	Proces 3	sses Strong 5	Comments/Explanations

INFOR		lf-Asses rocedui			•		
INITO	RMATION AND COMMUNICATION	Wea		cs, and		Strong	
		1	2	3	4	5	Comments/Explanations
39.	The LWDB's has controls in place to ensure costs are accurately recorded and allocated to the benefiting federal/state fund or grant.						
	14. The organization internally communicates information, inclilities for internal controls, necessary to support the functioning				1		
40.	Communication exists between management and the board of directors so that both have information needed to fulfill their roles with respect to the LWDB's objectives.						
41.	There is a process to quickly disseminate critical information throughout the LWDB when necessary.  Provide a description of the dissemination process.						
42.	Management has a process for the development, approval and implementation of policy updates and communicates those updates to staff.						
	15. The organization communicates with external parties regard	ding m	natters a	affectin	g the		
iunctionir	ng of internal controls.						

August 20, 2021 Page 15 of 19

INFORMATION AND COMMUNICATION			lf-Asses rocedur			-	
		Wea	ık			Strong	
		1	2	3	4	5	Comments/Explanations
43.	The LWDB has a means for anyone to report suspected improprieties regarding fraud; errors in financial reporting, procurement, and contracting; improper use or disposition of equipment; and misrepresentation or false statements.  Describe the process of how someone could report improprieties. Who receives/processes/investigates, etc.?						
44.	The LWDB has processes in place to communicate relevant and timely information to external parties.						
45.	The LWDB has processes in place to communicate the results of reports provided by the following external parties: Independent Auditor, DEO Bureau of Financial Monitoring and Accountability (FMA), DEO Bureau of One-Stop and Program Support, DEO Office of Inspector General, Florida Auditor General, and Federal Awarding Agencies (USDOL, USDHHS, and USDA) to the Board of Directors.						
			Self-Ass		nt of P	olioiss	
MONITORING ACTIVITIES			Proced			,	
			<i>eak</i>			Strong	r
		1		2 3	3	4	5 Comments/Explanations
-	l6. The organization selects, develops, and performs ongoing a whether the components of internal controls are present and fun	-	-	e evalu	ations	to	

MONI	TORING ACTIVITIES	Pro	cedure	ment o. s, and l	Process		
		Weak		ı		rong	
46.	The LWDB periodically evaluates its business processes such as cash management, comparison of budget to actual results, repayment or reprogramming of interest earnings, draw down of funds, procurement, and contracting activities.  Describe the process of how funding decisions are determined. What is the criteria, who initiates/approves, etc.?			3	4	5	Comments/Explanations
47.	The LWDB considers the level of staffing, training and skills of people performing the monitoring given the environment and monitoring activities which include observations, inquiries and inspection of source documents.						
48.	LWDB management periodically visits all career center locations in its region (including subrecipients) to ensure the policies and procedures are being followed and functioning as intended.  When was the most recent visit performed, by whom, and who were the results communicated to?						
_	17. The organization evaluates and communicates internal conties responsible for taking corrective action, including senior mariate.						

MONITORING ACTIVITIES		Self-Assessmen Procedures, an Weak			Process	•	
		1	2	3	4	5	Comments/Explanations
49.	The LWDB management takes adequate and timely actions to correct deficiencies identified by the external auditors, financial and programmatic monitoring, or internal reviews.						
50.	The LWDB monitors all subrecipients to ensure that federal funds provided are expended only for allowable activities, goods, and services and communicates the monitoring results to the LWDB's board of directors.  Are subrecipient monitoring activities outsourced to a third party? If so, provide the name of the party that performs the subrecipient monitoring activities.						

## **ATTACHMENT A**

# Department of Economic Opportunity Certification of Self-Assessment of Internal Controls

Local Workforce Development Board Number:
To be completed by the Executive Director:
A self-assessment of internal controls has been conducted for the 2021-2022 fiscal monitoring period. As part of this self-assessment, the Internal Control Questionnaire developed by the Department of Economic Opportunity has been completed and is available for review.
Signature:
Printed Name:
Title:
Date:
To be completed by the Board Chair or their designee:
I have reviewed the self-assessment of internal controls that was conducted for the 2021-2022 fiscal monitoring period.
Signature:
Printed Name:
Title:
Date:
Please scan and upload to SharePoint an executed copy of this certification on or before <b>September 30, 2021</b>

August 20, 2021 Page 19 of 19