## 2022-2023 Internal Control Questionnaire and Assessment

## Bureau of Financial Monitoring and Accountability Florida Department of Economic Opportunity



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#### **OVERVIEW**

## Introduction and Purpose

The Internal Control Questionnaire and Assessment (ICQ) was developed by the Florida 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 control.

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, LWDB's submit them to DEO by uploading to SharePoint.

## Definition and Objectives of Internal Control

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 Control

Internal control helps 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 control should be designed to achieve the objectives and adequately safeguard assets from loss or unauthorized use or disposition, and to provide assurance that assets are used solely for authorized purposes in compliance with federal and state 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:

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#### The non-federal entity must:

- (a) Establish and maintain effective internal control over the federal award that provides reasonable assurance that 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 statutes, 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 Control 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 control 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, this control cannot protect against economic downturns or make an understaffed entity operate at full capacity. Internal control 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 control systems, breakdowns in the internal control system may be caused by a simple error or mistake, or by faulty judgments made at any level of management. In addition, control may be circumvented by collusion or by management override. The design of the internal control 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 control across the organization. The board of directors and senior

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management establish the tone at the top regarding the importance of internal control 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 achieving 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 control developed by the COSO and presented in the Internal Controls – Integrated Framework. The five components of internal control listed above are fundamentally the same as the five standards of internal control and reflect the same concepts as the "Standards for Internal Control in the Federal Government."

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 control even though some or all of the listed characteristics are not present. Entities could have other appropriate internal control operating effectively that are not included here. The entity will need to exercise judgment in determining the most appropriate

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and cost effective internal control in any given environment or circumstance to provide reasonable assurance for compliance with federal program requirements.

## Completing the Questionnaire

On a scale of 1 to 5, with "1" indicating the area of greatest need for improvements in internal control and "5" indicating that a very strong internal control 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 LWDB Executive Director, reviewed and signed by the LWDB Chair or their designee, and uploaded to SharePoint.

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### Self-Assessment of Policies, CONTROL ENVIRONMENT Procedures, and Processes Weak Strong 5 Comments/Explanations Principle 1. The organization demonstrates a commitment to integrity and ethical values. 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. The LWDB has a code of conduct and/or ethics policy that is periodically updated and has been communicated to all staff, board members, and contracted service providers. When the LWDB hires employees from outside of the organization the person is trained or made aware of the importance of high ethical standards and sound internal control. The LWDB management has processes in place to evaluate the performance of staff and contracted service providers against the expected standards of conduct. Principle 2. The board of directors demonstrates independence from management and exercises oversight of the development and performance of internal controls. 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, and act when faced with obvious or suspected wrongdoing. The board of directors oversees the LWDB's design, implementation, and operation of the organizational structure so the board of directors can fulfil its responsibilities. The board of directors and/or audit committee maintains a direct line of communication with the LDWB's external auditors and internal monitors. The board of directors establishes the expectations and evaluates the performance of the chief executive officer or equivalent role.

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Prin	ciple 3. Management establishes, with LDWB oversight, organizationa	1 stru	cture.	reporti	ng line	es.	
	appropriate authorities and responsibilities in the pursuit of objectives.		·····,	<b>P</b>	<b>8</b>	,	
9.	Management periodically reviews and modifies the organizational structure of the LWDB in light of anticipated changing conditions or revised priorities.						
	Please provide the date of last review.						
10.	Specific lines of authority and responsibility are established to ensure compliance with federal and state laws and regulations and a proper segregation of duties.						
11.	The LWDB management maintains documentation of controls, including changes to controls, to meet operational needs and retain organizational knowledge.						
	ciple 4. The organization demonstrates a commitment to attract, devel viduals in alignment with objectives.	op, aı	nd reta	in com	petent		
12.	The LWDB's recruitment processes are centered on competencies necessary for success in the proposed role.						
13.	The LWDB provides training opportunities or continuing education to develop and retain sufficient and competent personnel. Training includes a focus on managing awards in compliance with federal and state statutes, regulations, and the terms and conditions of the award.						
14.	The LWDB has succession plans for senior management positions and contingency plans for assignments of responsibilities important for internal control.						
	ciple 5. The organization evaluates performance and holds individuals rol responsibilities in the pursuit of objectives.	acco	ıntabl	e for th	eir inte	ernal	
15.	Job descriptions include appropriate knowledge and skill requirements for all employees. Components of performance expectations are consistent with federal and state requirements applicable to each position. For all						
	employees, the LWDB regularly evaluates performance and shares the results with the employee.						

16.	The LWDB has mechanisms in place to ensure that all required						
	information is timely published to the LWDB's website in a manner easily						
	accessed by the public in compliance with laws, regulations, and provisions						
	of grant agreements.						
17.	The LWDB's management structure and tone at the top helps establish						
	and enforce individual accountability for performance of internal control						
	responsibilities.						
18.	The LWDB has policies, processes and controls in place to evaluate						
	performance and promote accountability of contracted service providers			Ш			
	(and other business partners) and their internal control responsibilities.						
RIS	SK ASSESSMENT	Pro	-Asses ocedure		Proce	sses	
RIS	K ASSESSMENT		cedure k	es, and	Proce	sses rong	Comments / Explanations
		Pro Wea	k 2	es, and	Proce St	sses rong 5	Comments/Explanations
Princ	SK ASSESSMENT  ciple 6. The organization defines objectives clearly to enable the identify tolerances.	Pro Wea	k 2	es, and	Proce St	sses rong 5	Comments/Explanations
Prino risks	ciple 6. The organization defines objectives clearly to enable the identificity tolerances.	Pro Wea	k 2	es, and	Proce St	sses rong 5	Comments/Explanations
Prino risks	ciple 6. The organization defines objectives clearly to enable the identification tolerances.  Management establishes a materiality threshold for each of its major	Pro Wea	k 2	es, and	Proce St	sses rong 5	Comments/Explanations
Princerisks	ciple 6. The organization defines objectives clearly to enable the identificity tolerances.	Pro Wea	k 2	es, and	Proce St	sses rong 5	Comments/Explanations
Princ risks 19.	ciple 6. The organization defines objectives clearly to enable the identification tolerances.  Management establishes a materiality threshold for each of its major objectives and identifies risk at each location where the LWDB conducts activities.	Pro Wea	k 2	es, and	Proce St	sses rong 5	Comments/Explanations
Princ risks 19.	ciple 6. The organization defines objectives clearly to enable the identification tolerances.  Management establishes a materiality threshold for each of its major objectives and identifies risk at each location where the LWDB conducts	Pro Wea	k 2	es, and	Proce St	sses rong 5	Comments/Explanations
Princ risks 19.	ciple 6. The organization defines objectives clearly to enable the identification tolerances.  Management establishes a materiality threshold for each of its major objectives and identifies risk at each location where the LWDB conducts activities.  Management uses operational objectives as a basis for allocating the	Pro Wea	k 2	es, and	Proce St	sses rong 5	Comments/Explanations
Prince risks 19.	ciple 6. The organization defines objectives clearly to enable the identification tolerances.  Management establishes a materiality threshold for each of its major objectives and identifies risk at each location where the LWDB conducts activities.  Management uses operational objectives as a basis for allocating the	Pro Wea	k 2	es, and	Proce St	sses rong 5	Comments/Explanations
Prince risks 19.	ciple 6. The organization defines objectives clearly to enable the identification tolerances.  Management establishes a materiality threshold for each of its major objectives and identifies risk at each location where the LWDB conducts activities.  Management uses operational objectives as a basis for allocating the resources needed to achieve desired operational and financial performance.	Pro Wea	k 2	es, and	Proce St	sses rong 5	Comments/Explanations
Prince risks 19.	ciple 6. The organization defines objectives clearly to enable the identification tolerances.  Management establishes a materiality threshold for each of its major objectives and identifies risk at each location where the LWDB conducts activities.  Management uses operational objectives as a basis for allocating the resources needed to achieve desired operational and financial performance.  The LWDB sets entity-wide financial reporting controls and assesses the	Pro Wea	k 2	es, and	Proce St	sses rong 5	Comments/Explanations

		Self-Assessment of Policies,				-	
RIS	SK ASSESSMENT	Procedures, and Processes					
			Weak Strong				(7)
		1	2	3	4	5	Comments/Explanations
	ciple 7. The organization identifies risks to the achievement of its object		across	the org	ganiza	tion	
	analyzes risks as a basis for determining how the risks should be manag	gea.					
22.	Management ensures that risk identification and analysis consider internal						
	and external factors and their potential impact on the achievement of						
	objectives.						
23.	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?						
24.	The LWDB's risk identification/assessment is broad and includes both						
	internal and external business partners and contracted service providers.						
Prin	ciple 8. The organization considers the potential for fraud in assessing	risks 1	o the a	chieve	ment	of	
	ctives.			.01110 , 0		<b>-</b>	
25.	The LWDB periodically performs an assessment of each of its operating						
	locations' exposure to fraudulent activity and how the operations could be						
	impacted.						
26.	The LWDB's assessment of fraud risks considers opportunities for:						
	<ul> <li>unauthorized acquisition, use and disposal of assets;</li> </ul>						
	<ul> <li>altering accounting and reporting records;</li> </ul>						
	corruption such as bribery or other illegal acts; and						
	other forms of misconduct, such as waste and abuse.						
	- Other forms of impediately steer as waste and abuse.						
	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.						

	ciple 9. The organization identifies, assesses, and responds to changes act the system of internal control.	The organization identifies, assesses, and responds to changes that could significantly						
				<del> </del>				
27.	The LWDB has mechanisms in place to identify and react to significant	Ш		Ш				
	changes presented by internal conditions including the LWDB's programs							
	or activities, oversight structure, organizational structure, personnel, and							
	technology that could affect the achievement of objectives.							
28.	The LWDB has mechanisms in place to identify and react to significant							
	changes presented by external conditions including governmental,							
	economic, technological, legal, regulatory, and physical environments that							
	could affect the achievement of objectives.							
29.	Considering significant changes affecting the LWDB, existing controls have							
	been identified and revised to mitigate risks.							
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		1	2	3	4	5	Comments/Explanations	
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	ciple 10. The organization selects and develops control activities that co	ntrib	oute to	the mit	igatio	n of		
risks	ciple 10. The organization selects and develops control activities that control activities that control achievement of objectives to acceptable levels.	ntrib	oute to	the mit	igatio	n of		
30.		ntrib	oute to	the mit	rigatio	n of		
	to the achievement of objectives to acceptable levels.	ontrik	oute to	the mit	igatio	n of		
	The LWDB has a written business continuity plan which includes	ontrib	oute to	the mit	igatio	n of		
	The LWDB has a written business continuity plan which includes contingencies for business processes, assets, human resources, and	ntrib	oute to	the mit	igatio	n of		
	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.	ontrib	oute to	the mit	igatio	n of		
30.	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.  Controls employed by the LWDB include authorizations, approvals,	ontrib	oute to	the mit	igatio	n of		
30.	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.	ontrib	oute to	the mit	igatio	n of		
30.	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.  Controls employed by the LWDB include authorizations, approvals, comparisons, physical counts, reconciliations, supervisory controls, and ensure allowable use of funds.	ontrib	oute to	the mit	igatio	n of		
30.	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.  Controls employed by the LWDB include authorizations, approvals, comparisons, physical counts, reconciliations, supervisory controls, and	ontrib	oute to	the mit	igatio	n of		

Princ	iple 11. The organization selects and develops general control activitie	s over	techno	logy to	o sup	port	
the a	chievement of objectives.						
32.	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.						
33.	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						
	organization's assets from external threats.						
34.	Management has identified the appropriate technology controls that						
	address the risks of using applications hosted by third parties.						
35.	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.						
36.	The LWDB has established organizational processes and procedures to						
	address cybersecurity risks to its critical information infrastructure.						
	(Reference: National Institute of Standards and Technology (NIST)						
	Cybersecurity Framework)						
	What measures are being taken to address the risk of cybersecurity						
	in the organization?						

Principle 12. The organization deploys control activities through policies that establish what is expected and procedures that put policies into action.							
37.	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.						
	1 localement, Contracting, and 1 ayron, 1 familian resources.						
38.	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).						
39.	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).						
40.	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.						
41.	LWDB periodically reviews policies, procedures, and related control						
	activities for continued relevance and effectiveness. Changes may occur in						
	personnel, operational processes, information technology, or governmental						
	regulations.						

IN	FORMATION AND COMMUNICATION	Procedures, and Processes				ses	
		Wea.	Weak Strong			trong	
		1	2	3	4	5	Comments/Explanations
	ciple 13. The organization obtains or generates and uses relevant, quetioning of internal control.	ality in	formati	on to s	upport	the	
42.	Federal, state, or grant program rules or regulations are reviewed by one or more of the following: governing board, audit, finance or other type committee.  How often are these reviewed?						
43.	The LWDB considers both internal and external sources of data when identifying relevant information to use in the operation of internal control.						
44.	The LWDB has controls in place to ensure costs are accurately recorded and allocated to the benefiting federal/state fund or grant.						
	ciple 14. The organization internally communicates quality informationsibilities for internal control, necessary to support the functioning of				ves and	1	
45.	Communication exists between personnel, management, and the board of directors so that quality information is obtained to help management achieve the LWDB's objectives.						
46.	There is a process to quickly disseminate critical information throughout the LWDB when necessary.  Provide a description of the dissemination process.						
47.	Management has a process for the development, approval and implementation of policy updates and communicates those updates to staff.						

Self-Assessment of Policies,

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Principle 15. The organization communicates with external parties regarding matters affecting the							
func	tioning of internal controls.						
48.	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.?						
49.	The LWDB has processes in place to communicate relevant and timely						
	information to external parties.						
50.	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, DEO Bureau of						
	One-Stop and Program Support, DEO Office of Inspector General,						
	Florida Auditor General, and federal awarding agencies (U.S.						
	Department of Labor, U.S. Department of Health and Human Services,						
	and U.S. Department of Agriculture to the Board of Directors).						
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M(	ONITORING ACTIVITIES			lures, a	nd Pro		
		<u> </u>	eak			Stron	
ъ.		1/	2				Comments/Explanations
	ciple 16. The organization selects, develops, and performs ongoing a crtain whether the components of internal controls are present and fur	-	_	te evalu	ations	to	
51.	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.?						

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		Wea	k		S	trong	
		1	2	3	4	5	Comments/Explanations
52.	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.						
53.	LWDB management periodically visits all career center locations in its						
	local area (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?						
Prin	ciple 17. The organization evaluates and communicates internal control	l defici	encies i	in a tim	nely ma	nner	
to th	ose parties responsible for taking corrective action, including senior m	anagen	nent and	d the bo	oard of		
dire	ctors, as appropriate.						
54.	The LWDB management takes adequate and timely actions to correct						
	deficiencies identified by the external auditors, financial and programmatic						
	monitoring, or internal reviews.						
55.	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 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.						

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## ATTACHMENT A

# Florida 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 control has been conducted for the 2022-2023 fiscal monitoring period. As part of this self-assessment, the Internal Control Questionnaire developed by the Florida Department of Economic Opportunity has been completed and is available for review.
Signature:
Printed Name:
Title:
Date:
To be completed by the Board Chairperson or their designee:
I have reviewed the self-assessment of internal control that was conducted for the 2022-2023 fiscal
monitoring period.
Signature:
Printed Name:
Title:
Date:
Please scan and upload to SharePoint an executed copy of this certification on or before <b>October 19, 2022</b> .

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