2018-19 Internal Control Questionnaire and Assessment

Bureau of Financial Monitoring and Accountability Florida Department of Economic Opportunity

September 14, 2018



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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

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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

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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

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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.

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CONTROL ENVIRONMENT					of Polis	•	
		Weal	•		S	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.						
	Provide policy/policy number(s) and page number(s) that address the statement made above.						
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.						
of the de	e 2. The board of directors demonstrates independence from manaevelopment and performance of internal controls.	agemen	nt and	exercis	es over	sight	
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.						

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Principl	e 3. Management establishes, with board oversight, structures, rep	orting	lines,	and ap	propria	ite				
authorit	ies 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.									
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.									
Principle 4. The organization demonstrates a commitment to attract, develop, and retain competent										
	als in alignment with objectives.									
10.	The LWDB provides training opportunities or continuing education									
	to develop and retain sufficient and competent personnel.									
	Describe the Specific Training Offered									
11.	The LWDB has succession plans for senior management and									
	contingency plans for assignments of responsibilities important for									
	internal controls.									
4.0										
12.	For all positions, there are current written job descriptions, reference		Ш							
	manuals or other forms of communication to inform personnel of									
	their duties.									
	How Often are Position Descriptions Reviewed?									
_										
Principl	e 5. The organization holds individuals accountable for their inter	nal con	trol re	sponsil	oilities	in the				
_	of objectives.									
13.	Policies, processes or directives are in place that ensures employees									
	are aware of their role related to internal control responsibilities.									
				l						

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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. Provide policy/policy number(s) and page number(s) that address the statement made above.						
RISK ASSESSMENT Self-Assessment of Police Procedures, and Process Weak Signature Self-Assessment of Police Procedures, and Process Signature Procedures and Process Signature Signature Procedures and Process Signature Signatur						-	
		1	2	3	4	5	Comments/Explanations
_	e 6. The organization specifies with sufficient clarity to enable trelating to objectives.	he iden	tificatio	on and	assessi	nent	
16.	Management establishes a materiality threshold for each of its major objectives and identifies risk at each location where the LWDB conducts activities.						
17.	M						
17.	Management uses operational objectives as a basis for allocating the resources needed to achieve desired operational and financial performance.						

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	7. The organization identifies risks to the achievement of its or risks as a basis for determining how the risks should be managed.	nd					
•		eu.					
19.	Management ensures that risk identification considers internal			Ш			I
	and external factors and the potential impact on the achievement						I
	of objectives.						
	What are three biggest risks affecting the organization, and						
	what mitigating controls are in place?						
20.	The LWDB adequately and effectively manages risks to the						
	organization and has designed internal controls in order to						I
	mitigate the known risks.						
	What new controls, if any, have been implemented since the						
							ı
	prior year and what organizational risks do they mitigate?						
21.	The LWDB's risk identification/assessment is broad and includes						
	both internal and external business partners and outsourced						I
	service providers.						
Principle	8. The organization considers the potential for fraud in assessi	ng risk	s to the	e achie	vement	of	
objectives		8					
22.	The LWDB periodically performs an assessment of its exposure						I
	to fraudulent activity and how the operations could be impacted.						
23.	The LWDB periodically performs an assessment of each of its						
	operating locations' exposure to fraudulent activity and how the						I
	operations could be impacted.						
	When was the last assessment performed, and by whom?						

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24.	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.									
	In the comments/explanations section, provide a narrative									
	of the system/process for safeguarding prepaid program									
	items (i.e. gas cards, visa cards) against unauthorized									
	use/distribution.					<u> </u>				
Principle 9. The organization identifies and assesses changes that could significantly impact the system										
	l controls.									
25.	The LWDB has mechanisms in place to identify and react to	, Ш				, 🗀				
	risks presented by changes in government, regulatory, economic,	j				ı				
	operating, or other conditions that could affect the achievement]								
	of the goals and objectives.]								
	,	į				į				
26.	The most significant risks affecting the LWDB have been									
	identified and controls are designed and implemented that]								
	mitigate risks.]								
		j				ı				
	Identify three of the most significant internal risks that	j				ı				
	could impact the achievement of objectives.	j				ı				
27.	Considering the most significant risks, identified above, have	ı Ш				, Ш				
	controls been designed and implemented that mitigate risks	j				ı				
	associated with each.	j				ı				
		j				ı				
	In the comments/explanations section, please elaborate on	j				ı				
	the mitigating controls.	1								

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CONTROL ACTIVITIES			ocedur		of Poli Proce	sses	
		Wea	1	1		Strong	_
		1	2	3	4	5	Comments/Explanations
	10. The organization selects and develops control activities that are achievement of objectives to acceptable levels.	contri	bute to	the m	itigatio	n of	
28.	Management control activities consider all the relevant business processes, information technology and locations where control activities are needed, including outsourced service providers and other partners.						
29.	Controls employed by the LWDB include authorizations, approvals, comparisons, physical counts, reconciliations and supervisory controls.						
30.	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.						
	11. The organization selects and develops general control activivement of objectives.	ties ove	er tech	nology	to sup	port	
31.	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. In the comments/explanations section, provide a narrative of the process of authorizing access for new employees, revoking access for separated employees, and changes to authorized users commensurate with their changes to their						
	job.						

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CONTROL ACTIVITIES			f-Asses ocedur k		l Proce	•	
		1	2	3	4	5	Comments/Explanations
	responsibilities.						_
32.	Management has identified the appropriate technology controls that address the risks of using applications hosted by third-parties.						
33.	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. Describe how personally identifiable information of program participants is protected and/or redacted. 12. The organization deploys control activities through policies						
-	dures that put policies into action.	tnat es	stabiisn	wnat i	is expe	ctea	
34.	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. For tasks lacking the appropriate segregation of duties describe any compensating controls in place in the comments/explanations section.						
35.	Management periodically performs a review of all policies and procedures to determine their continued relevance, consistency.						

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CONTROL ACTIVITIES			lf-Asses ocedur k		Proce	-	
		1	2	3	4	5	Comments/Explanations
	compliance with 2 CFR Part 200 (Uniform Guidance) or other guidance or directives.						
	When did the last in-depth policy review occur; what, if any, policies were updated as a result?						
36.	The LWDB maintains policies and procedures to facilitate the recording and accounting of transactions in compliance with laws, regulations, and provisions of contracts and grant agreements.						
	Provide policy/policy number(s) and page number(s) that address the statement made above.						
			•				
INFOR	MATION AND COMMUNICATION	Pr	f-Asses ocedur		Proce	sses	
		Wea				Strong	
		1	2	3	4	5	Comments/Explanations
	3. The organization obtains or generates and uses relevant, quag of internal controls.	ality in	format	ion to s	uppor	t the	
37.	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?						

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INFORMATION AND COMMUNICATION			lf-Asses rocedur			-	
		Wea	ık		3		
		1	2	3	4	5	Comments/Explanations
38.	The LWDB considers both internal and external sources of data when identifying relevant information to use in the operation of internal controls.						
39.	The LWDB's has controls in place to ensure costs are accurately recorded and allocated to the benefiting federal/state fund or grant. In the comments/explanations section, elaborate on the control(s) that ensure costs accurately recorded.						
	14. The organization internally communicates information, incl				l		
40.	Communication exists between management and the board of	of inte	ernal co	ntrols.			
40.	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.						

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Self-Assessment of Policies, Procedures, and Processes INFORMATION AND COMMUNICATION Weak Strong Comments/Explanations 5 1 Principle 15. The organization communicates with external parties regarding matters affecting the functioning of internal controls. The LWDB has a means for anyone to report suspected 43. 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.? The LWDB has processes in place to communicate relevant and 44. timely information to external parties. The LWDB has processes in place to communicate the results of 45. 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.

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MONITORING ACTIVITIES			cedure		f Polici Process Str		
		Weak	2	3	4	5	Comments/Explanations
	16. The organization selects, develops, and performs ongoing a whether the components of internal controls are present and fur	nd/or sep			ons to		Gommono, Emparaturono
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.						
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 Career Center locations and other decentralized locations (including subrecipients) to determine whether policies and procedures are being followed and functioning as intended. Describe when the most recent visit was performed, by whom, and who were the results communicated to?						

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		es,	•				
MONIT	TORING ACTIVITIES	Pro	cedure	s, and l	Process	es	
			Weak		Str	ong	
		1	2	3	4	5	Comments/Explanations
Principle 1	7. The organization evaluates and communicates internal cont						
those parti	es responsible for taking corrective action, including senior ma						
as appropr	riate.						
49.	The LWDB management takes adequate and timely actions to						
	correct deficiencies reported by the external auditors, financial						
	and programmatic monitoring, or internal reviews.						
50.	The LWDB monitors 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.						

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ATTACHMENT A

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

Local Workforce Development Board:
To be completed by the Executive Director:
A self-assessment of internal controls has been conducted for the fiscal monitoring period, April 1, 2018-March 31, 2019. 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 fiscal monitoring period April 1, 2018-March 31, 2019.
Signature:
Printed Name:
Title:
Date:
Please scan and upload to SharePoint an executed copy of this certification on or before October 15, 2018.

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