

Control Environment and Organizational Structure

The term *control environment* refers to an entity's "corporate culture", showing how much the entity's leaders value ethical behavior and internal control. The key element in a favorable control environment is management's attitude, as demonstrated through its actions and example. The control environment is the foundation of the COSO internal control framework. It provides discipline and structure while encompassing both technical competence and ethical commitment. Management's "tone at the top" sets the standard for the entire entity since even the best policies and procedures cannot overcome the force of a bad example. A favorable control environment requires that management communicate the importance of internal controls to staff at all levels.

Control Objectives:

1. Management emphasizes the importance of internal control through its attitude, actions, and values, and communicates this tone to all employees.
2. Management adheres to a code of conduct and other policies regarding acceptable business practices, conflicts of interest, or expected standards of ethical and moral behavior, and communicates these policies to all employees.
3. Management takes appropriate disciplinary action in response to departures from approved policies and procedures or violations of the code of conduct.
4. A strategic plan and mission statement are in place to provide guidance and assistance to management.
5. Financial policies and procedures for authorization and approval of transactions are in place and communicated to all applicable employees.
6. Organizational structure is clearly defined and up-to-date, with the appropriate reporting relationships established and communicated to all employees.
7. Appropriate controls are in place to monitor and review operations and programs.
8. Qualified and properly trained personnel are hired to help ensure control procedures are followed and resources are used efficiently.
9. Current job descriptions are established detailing the responsibilities and qualifications for each position.

CONTROL ENVIRONMENT

Questionnaire Objective: To obtain sufficient knowledge of the entity's control environment to understand management's and the governing body's attitude, awareness and actions concerning the following factors of the control environment:

- A. Integrity and Ethical Values
- B. Commitment to Competence
- C. Governing Body/Audit Committee
- D. Management Philosophy and Operating Style
- E. Organizational Structure
- F. Methods of Assigning Authority and Responsibility
- G. Personnel Policies and Practices

A.	Integrity and Ethical Values:	Yes	No	N/A	Comments
1.	Does previous experience with the entity indicate financial integrity among management and personnel?				
2.	Has a code of conduct been adopted that addresses acceptable business practices?				
3.	Does the code of conduct address policy for potential conflicts of interest?				
4.	Are these policies adequately communicated to employees?				
5.	Do management and staff comply with the department's policies and procedures?				

Control Environment and Organizational Structure

A.	Integrity and Ethical Values:	Yes	No	N/A	Comments
6.	Does management discuss internal controls at management and other staff meetings?				
7.	Does the entity have an updated internal control plan?				
8.	Is the internal control plan communicated to applicable personnel?				
9.	Does management reward employees for following good internal control practices?				
10.	Is there a procedure in place for employees to report suspected violations of policies?				
11.	Does management take appropriate disciplinary action when necessary to enforce the code of conduct?				
12.	Is the entity aware of applicable federal or state grant provisions and requirements?				
13.	Does the entity know to follow the applicable federal grant guidelines if they are more stringent than the entity's normal policies and procedures?				
14.	Do significant pressures exist to not exceed budgeted amounts because of taxpayer initiatives, election promises, or similar political considerations?				

B.	Commitment to Competence:	Yes	No	N/A	Comments
1.	Does previous experience with the entity indicate competence among management and key personnel?				
2.	Does the entity define the tasks that make up a particular job?				
3.	Does the entity analyze and document the knowledge and skills needed to perform jobs?				
4.	Does the entity provide for applicable training of its employees?				
5.	Are the personnel responsible for ensuring compliance with federal and state laws knowledgeable and experienced in administering these programs?				
6.	Do accounting personnel have the background, education and experience appropriate for their duties?				
7.	Do accounting personnel appear to understand the duties and procedures applicable to their jobs?				
8.	Do accounting personnel appear to have sufficient expertise in selecting and applying applicable accounting principles?				
9.	Do accounting supervisors appear to have sufficient expertise to review accounting transactions for accuracy and compliance with rules and regulations?				
10.	Do accounting supervisors frequently prepare reports or reconciliations to verify the accuracy of financial transactions processed?				

Control Environment and Organizational Structure

C.	Governing Body/Audit Committee:	Yes	No	N/A	Comments
1.	Does a governing body exist? If yes: (Answer A-C)				
	A) Are there regular meetings of the governing body to set policies and objectives and review the entity's performance?				
	B) Are the minutes of such meetings prepared and signed on a timely basis?				
	C) Has the governing body been informed about and approved all of the federal and state grants the entity is to or has received?				
2.	Does an audit committee exist? If yes: (Answer A-D)				
	A) Does the audit committee represent an informed, vigilant and effective overseer of the financial reporting process and the entity's internal control structure?				
	B) Has the governing body written a charter for the audit committee, outlining its duties and responsibilities?				
	C) Does the audit committee assist the governing body in maintaining a direct line of communication with the entity's internal and external auditors?				
	D) Does the audit committee have resources and authority to discharge their responsibilities?				

D.	Management Philosophy and Operating Style:	Yes	No	N/A	Comments
1.	Does the entity have a mission statement, objectives and goals?				
2.	Is this information communicated to applicable personnel?				
3.	Are management and operating decisions determined at appropriate levels?				
4.	Does management ask employees for their suggestions on how to improve processes?				
5.	Has management given a high priority to its internal control structure?				
6.	Does management emphasize meeting the budget and/or other financial and operating goals?				
7.	Does management take an active role in the financial reporting of the entity?				
8.	Is the entity meeting its financial obligations?				
9.	Does management review audit recommendations and take appropriate corrective action?				
10.	Is management willing to adjust the financial statements for misstatements that approach a material amount?				
11.	Is there a plan for the future development of new information systems and acquisition of hardware?				
12.	Is this plan reviewed and approved by senior management within the office, division or department?				
13.	Does management review audit recommendations and take appropriate corrective action?				

Control Environment and Organizational Structure

E.	Organizational Structure:	Yes	No	N/A	Comments
1.	Is there an organization chart clearly defining the lines of management authority and responsibility?				
2.	Is the organization chart current and accurate?				
3.	Is the organizational structure appropriate for the size and complexity of the entity?				
4.	Are there formalized policies and procedures for all major operations of the entity?				
5.	Are policies and procedures for authorizations established at a reasonably high level?				
6.	Does the governing body and management stress adherence to such policies and procedures?				
7.	Have specific line of authority and responsibility been established to ensure compliance with federal and state laws and regulations?				

F.	Methods of Assigning Authority and Responsibility:	Yes	No	N/A	Comments
1.	Is there a clear assignment of responsibility and delegation of authority to deal with such matters as organizational goals and objective, operating functions and regulatory requirements?				
2.	Is management actively involved in supervision of the various functions?				
3.	Are channels of communications (from top down and from bottom up) being utilized?				
4.	Has fiscal authority been formally delegated to specific management personnel?				
5.	Does management understand the concept and importance of internal controls, including the division of responsibility?				
6.	Has management clearly communicated the scope of the authority and responsibility to deal with information system management?				
7.	Has the entity identified an individual that is responsible for coordinating the various federal and state programs within the entity?				
8.	Do you perform periodic audits of subrecipient financial operations in compliance with OMB Circulars A-110 or A-133 regulations?				
9.	If independent audits of subrecipients are performed, do you require their submission for your review?				

G.	Personnel Policies and Practices:	Yes	No	N/A	Comments
1.	Does management check credentials and references of new employees?				
2.	Are confidentiality agreements required for employees who come in contact with confidential information?				
3.	Does the workload of the accounting employees facilitate the preparation of reliable accounting records?				
4.	Is turnover of key fiscal personnel relatively low?				
5.	Are vacations mandatory for all personnel?				

Control Environment and Organizational Structure

G.	Personnel Policies and Practices:	Yes	No	N/A	Comments
6.	Are duties rotated when employees are on vacation?				
7.	Are policies regarding personal use of computer equipment and software clearly stated?				
8.	Does the entity have an information security officer?				
9.	Does the entity have a formal information systems security policy?				
10.	Are information system policies and expectations clearly communicated to all employees?				
11.	Does the workload permit information system personnel to perform their internal control responsibilities?				
12.	Is the information system work force relatively stable (low turnover)?				
13.	Is there a policy regarding ownership of in-house developed software and data?				
14.	Do the information system personnel practices include policies to maintain security upon termination of employment?				
15.	Are there written job descriptions for each employee (including information system personnel) delineating specific duties, reporting relationships, and constraints?				
16.	Does management ensure compliance with the department's personnel policies and procedures concerning hiring, training, promoting, and compensating employees?				
17.	Are sufficient training opportunities available to improve competency and update employees on new policies and procedures?				
18.	Are employees cross-trained to ensure the uninterrupted performance of personnel functions?				