



January 15, 2014

Green Book Project Team
 US Government Accountability Office
 441 G Street, NW
 Washington, DC 20548

Project Team:

We have reviewed the proposed changes to Standards for *Internal Control in the Federal Government* (Green Book), 2013 Exposure Draft. In general, we support these proposed changes. However, we do provide the following for your consideration:

Paragraph Reference	Question #	Comment
2.01-2.16	7	There appears to be an assumption that an organization's audit committee would part of the Oversight Body, but, it is not explicitly stated. Perhaps it should be clarified.
2.01-2.16	7	When discussing the establishment of the Oversight Structure and the responsibilities of the Oversight body, the exposure draft appears be silent with regards to the establishment of an internal audit unit. While this may be less common at the federal level, internal audit units at the state and local levels act as the eyes and ears of the Oversight Body.
7.12	3	In addition to the identification of risk tolerance, we believe that cost/benefit analyses need to be evaluated when considering response to risk.
7.13	5	Overall, the Risk Assessment section is well done; however, it is written as if the process is starting from scratch. There appears to be a need for a paragraph, following paragraph 7.13, indicating the necessity for revisiting the risk assessment process on a periodic basis.

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17.08, 17.10	5	Audit resolution should be addressed within these paragraphs, in addition to monitoring and reporting, since audit findings and recommendations can be aimed at strengthening internal control.
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Thank you for the opportunity to comment on this Exposure Draft. If there are any questions or if additional information is needed, please contact me at [REDACTED] or [REDACTED].

Sincerely,



John Kaschak, CPA
Director, Bureau of Audits

cc: Anna Maria Kiehl
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