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From:

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Thanks for allowing me to comment.

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Yellow Book Comments

Chapter 2

In 2.14- What about the Association of Inspector General's Standards being incorporated.

Chapter 3

I thought the yellow book provided a lot more detail related to Independence, Ethics and Professional Judgement. It is clearly explained of what is required and prohibited under GAGAS.

Chapter 4

Who is going to develop the new 4.00 hours class that is going to be required so it meets the intent of this change in 4.15?

Chapter 5

Good explanation of Peer Review. Hope that GAO will put out some Peer Review checklist and guidance so organizations will now what is required. In addition, a guide needs to be developed and required to be used so all reviews will be consistent throughout the industry.

Chapter 7

I thought the expanded requirements and application guidance was laid out very well for an auditor to understand.

Chapter 8

I thought the ways that auditors should assess internal control on performance audits was well written.

General Comments

I still feel that the yellow book is not internal audit driven. It is more programmatic. I think they should incorporate that that internal auditors in government should use IIA standards for internal audits. Many statutes state that government internal auditors must use GAGAS. Having Yellow book state that internal auditors should use the Redbook opens the door for government internal auditors to be able to add more value. The yellow book standards are more finding and recommendation driven and does not allow the internal auditors to perform consulting engagements or reviews which is way that internal auditors can add value. Based on surveys from leader's show that they need their internal auditors to be able to add more value which the yellow book restricts.

My feeling on peer reviews is that they should look at the following:

1. Independence
2. Training of Staff and Staff qualification for the engagement
3. Review of workpapers for Planning, Fieldwork and Reporting
4. In addition, make sure that managers are involved in reviewing the workpapers and a quality assurance program is implemented.
5. I am concern that the peer review team looks at other things besides **audits.** Investigation usually follow other standards.
6. My experience with peer reviews is that only audits were reviewed which is what the yellow book really provides guidance.(Peer reviews performed by state auditors on Inspector General offices)
7. Develop a user guide and checklist for the peer review team to use in evaluating audit shops.

Thanks for allowing me to comment on the yellow book.