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**From:** [Redacted]  
**Sent:** Thursday, June 29, 2017 12:09 PM  
**To:** Yellow Book Comments  
**Cc:** [Redacted]  
**Subject:** Comments by the Office of Trust Review and Audit, Office of the Special Trustee for American Indians, DOI

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## Comments and Questions for GAO

Please comment on how the revised format of GAGAS affects the organization and readability of the standards.

**Overall, we like the new format and arrangement of chapters. It is easier to relate the standards to the work done by the audit organization.**

Please comment on whether the revisions related to non-audit services sufficiently and clearly explain what is required and prohibited under GAGAS.

**Yes.**

Do these roles and descriptions clarify the competence required of auditors conducting engagements in accordance with GAGAS? Is the level of proficiency expected for each of these roles clear?

**Yes and Yes.**

Please comment on any additional topics that could be included in the 4-hour GAGAS CPE requirement or other requirements that would enhance auditor proficiency in GAGAS.

**Additional topics we believe relevant are Governance and Audit Leadership, Strategic Planning, Audit Organization Risk Assessment and Annual Planning, the Internal Control Framework, and Technical Training on how the auditor should apply these areas in the audit organization's leadership and management.**

**Question: Are the topics included in the 4-hour GAGAS topics, listed in paragraph 4.23 in addition to or inclusive of the 4 hour ethics training required by many state accountancy boards? Are the 4 hours**

**GAGAS topics in addition to or inclusive of the annual ethics training required of some Federal employees?**

In chapter 5 (“Quality Control and Peer Review”), peer review requirements are categorized by requirements for (1) audit organizations affiliated with recognized organizations and (2) other audit organizations. (paras. 5.63 through 5.113)

Are the peer review requirements for each category of audit organization clear? **Yes.**

**Question: An internal audit organization in the Federal government chooses to comply with both GAGAS and International Standards for the Professional Practice of Internal Auditing. Will the 5-year external review combined with annual periodic self-assessments required under the IPPF be sufficient to satisfy the 3-year interval required by GAGAS paragraph 5.82? In this era of very tight Federal budgets, is the 3-year interval too stringent and expensive?**

In chapter 8 (“Fieldwork Standards for Performance Audits”), internal control considerations are expanded to reference the 2014 *Standards for Internal Control in the Federal Government* and *Internal Control – Integrated Framework*. (paras. 8.37 through 8.65)

Do these sections clearly describe ways auditors assess internal control on performance audits? **Yes.**

**Question: An internal audit organization in the Federal government conducts performance audits of certain entities and programs in the Federal government. Does the internal auditor assess if the audited entity is sufficiently conforming to the 2014 *Standards for Internal Control in the Federal Government* and *Internal Control – Integrated Framework* when considering internal control in planning and conducting its audits?**