

From: [REDACTED]
To: [REDACTED]
Subject: Personal comments regarding the 2017 exposure draft
Date: Thursday, June 29, 2017 9:26:34 AM

With regard to paragraphs 3.26 and 3.27: Sometimes internal audit organizations have senior executive leadership who are not audit professionals and who lack the depth of training and experience to understand fully audit standards and applications, or the role of internal audit in the governance of organizations. These individuals constantly present threats to independence, objectivity, integrity, and mostly do not understand or appreciate the role that internal audit organizations can and should have in the governance and management structure of the Federal agency.

GAGAS and Internal Audit Awareness training for this audience would be helpful.

With regard to paragraph 1.12 and specifically subparagraph d: Federal agency internal auditors should have adequate charters, similar to the charter defined by International Standards for the Professional Practice of Internal Auditing. Founding documents for federal agencies, like mine, do not address audit standards when defining the role of the internal audit organization, indeed may not even consider it an audit organization at all. Standards for conducting internal audits and chartering internal audit organizations in the Federal government should be addressed by the GAO.