

# INTERNAL CONTROL DOCUMENTATION

Entity: XXXX A Savings Bank XXXX  
Subsidiary or Division: \_\_\_\_\_  
Balance Sheet Date: \_\_\_\_\_

Prepared: \_\_\_\_\_  
Approved: \_\_\_\_\_  
Partner: \_\_\_\_\_

## General

This form assists us in:

- Gaining an understanding of internal control at the entity level to plan the audit and to determine the nature, timing and extent of our audit procedures;
- Identifying and evaluating the design of the entity-level controls important to the audit;
- Determining whether the entity-level controls important to the audit have been implemented;
- Assessing the effectiveness of internal control at the entity level; and
- Summarizing the procedures performed and information considered in identifying the risks of material misstatement due to fraud.

We also are required to obtain information about internal control at the individual application/process level to plan the audit (e.g., make our combined inherent and control risk assessments) and to determine the nature, timing, and extent of our audit procedures.

The information we obtain and document in this form also is useful in evaluating entity-level controls in connection with engagements to report on internal control over financial reporting (e.g., Section 404 of the Sarbanes-Oxley Act of 2002, FDICIA).

4. The form includes a Table of Contents that has hyperlinks to each applicable section. Also, hyperlinks back to the Table of Contents or to other specific sections within Parts 1 and 2 are included within the form. After using a hyperlink, you may return to the point of origin by selecting the back arrow key on the Microsoft Word toolbar. These hyperlinks provide the engagement team the ability to copy, paste, and edit information from the detailed sections within Parts 1 and 2 to the Conclusion on the Effectiveness of Internal Control at the Entity Level and the Summary of Observations and Identified Fraud Risks. In addition, the hyperlinks will facilitate review of the information in the form.

## Instructions for Completing the Internal Control Document

1. Many sections of the form require the engagement team to document observations based on a list of factors to consider. It is not necessary to provide a response for each factor. Rather, the list of factors is intended to be thought-provoking so that the engagement team can apply its collective knowledge of the entity in tailoring an appropriate response for the applicable section.
2. We document our consideration of the components of internal control at the entity level in Part 1 of the form. The responses provided should include relevant observations (whether positive or negative) based on the Factors to Consider. Accordingly, a response of "none" or "not applicable" is not appropriate for this section within Part 1. We also identify the entity-level controls important to the audit and determine whether those controls have been properly designed and implemented in Part 1. Responses within Part 1 should be sufficient to support our Conclusion on the Effectiveness of Internal Control at the Entity Level. Any response within Part 1 that is indicative of a potential fraud risk also is included in the Summary of Observations and Identified Fraud Risks.
3. Part 2 is used to document sources of information available specific to our identification of the risks of material misstatement due to fraud. Responses in Part 2 that are indicative of a potential fraud risk are included in the Summary of Observations and Identified Fraud Risks.

Internal Control Document

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# Documenting Internal Controls Sample

**David F. Groebner, Patrick W. Shannon**



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