Contents

Pretace	Elica	1X
Chapter 1	Understanding the SEC's Guidance for Management	1
	Purpose of Internal Control over Financial	1
	Reporting	
	Evaluation Process	5
	Reporting Considerations	12
	Rule Amendment and other SEC Guidance Related to	14
	Internal Control over Financial Reporting	
Chapter 2	The PCAOB's Auditing Standard No. 5	19
	Eight Concepts to Focus the Audit on Matters	20
	Most Important to Internal Control	
	New Emphasis on Entity-Level Controls	28
	Importance of a Fraud Risk Assessment	29
	Tips to Eliminate Unnecessary Procedures	30
	Scaling Audits for Smaller Companies	36
Chapter 3	SEC's Guidance on a Risk-Based Approach	39
	Highlights of the SEC Staff Statement	40
	Staff's Emphasis on Reasonable Assurance	41
	Comments on Evaluating Internal Control Deficiencies	45
	Disclosures about Material Weaknesses	46
	Information Technology Comments from the Staff	47
	Communications with Auditors: An Unintended	48
	Consequence	
	Message for Small Business Issuers and Foreign	50
	Private Issuers	

Chapter 4	Highlights of the PCAOB's May 2005 Policy Statement	51
	Policy Statement Highlights	52
	Integrating the Financial and Internal Control Audits	52
	Importance of Professional Judgment	55
	Top-Down Approach and Role of Risk Assessment	56
	When Auditors Can Use the Work of Others	57
	Auditors' Ability to Provide Advice to Audit Clients	57
	How the PCAOB Inspections Help Drive Improvements	59
	A Final Comment	59
Chapter 5	Starting at the Top: Using Entity-Level Controls to	61
•	Create Efficiencies	
	What are Entity-Level Controls?	61
	How Strong Entity-Level Controls Can Reduce the	62
	Scope of Your Program	
	How to Apply COSO's Recent Internal Control Guidance	65
	How to Create a Winning Control Environment	66
	Steps for Creating a Useful Risk Assessment Process	76
	Control Activities	85
		85
	Creating an Effective Information and Communication Program	65
	How to Implement Successful Monitoring Controls	90
	How to Assign Roles and Responsibilities to Enhance	94
	Internal Controls	31
	Small-Company Issues for Implementing Entity-Level	98
	Controls	30
	Summary of COSO's Guidance for Smaller	103
	Public Companies	100
Chapter 6	Minimizing Excess through Proper Scoping and	105
Chapter 0	Planning Practices	103
	Scoping Analysis: Event or Process?	106
		106
	How to Determine Materiality for Scoping Purposes	111
	How to Use a Top-Down, Risk-Based Approach to	111
	Reduce the Scope of Your Program Mothods for Determining Significant Locations	116
	Methods for Determining Significant Locations	116
	Specific Areas Included and Excluded by the PCAOB	120
	PCAOB and SEC Guidance on Other Common	123
	Scoping Issues Tipe for Resource Planning and Davidening Useful	104
	Tips for Resource Planning and Developing Useful Timelines	124
Chapter 7	Advantageous Project Management Techniques	127
	11 Areas of Focus for the Second Year and Beyond	128
	How to Increase Productivity with a Sound Management	129
	Approach	
	Aim for the Target Instead of the Way to Get There	130
	,	

	Contents	VII
	More Project Management Tips	135
	Staffing Strategies	138
	Restructuring the Organizational Chart for Sustainability	144
	How to Communicate Effectively through Emails, Meetings, and Advisories	148
	Tactics for Dealing with Business Changes for Sections 302 and 404 Compliance	150
Chapter 8	Streamlining Documentation	155
	Three Ideas to Improve Your Overall Documentation Process	157
	Clearing the Clutter: How to Create and Maintain Meaningful Control Matrices	159
	Using Relevant Financial Assertions for Planning Purposes	161
	Financial Assertion Help for Nonauditors	162
	Techniques for Scrutinizing the Number of Key Controls	163
	How to Reduce and Improve Controls with Standardization	166
	Practical Ideas for Documenta ion at International Locations	168
	How to Create an Effective Spreadsheet Control Program	169
	How to Create Strong Financial Reporting Controls	172
	Tools for Assessing Control Design	175
	An Alternative to Gap Remediation	176
	Three More ideas for Improving Documentation	177
Chapter 9	Economical Testing Techniques	181
	Testing Control Design and Operating Effectiveness	181
	Practical Steps to Applying Guidance on the Nature, Timing, and Extent of Testing	182
	Suggestions for Testing Significant Manual and Nonroutine Transactions	184
	Using Update Tests to Ease the Burden of Testing at Year-End	186
	Five Ideas for the Timing of Control Tests	190
	Types of Control Tests and When to Use Them	194
	Why You Should Minimize the Use of Self-Assessment Tests	197
	Maximizing Your Auditors' Reliance on the Work of Others	199
	More Inspiration on Efficient Testing	210
Chapter 10	Methods for Remediation Madness	215
	Do All Controls Have to Be Remediated?	216
	For-Now Approach to Remediation	217

viii Contents

	Creating Meaningful Remediation Plans Nine Practice Tips for the Remediation Phase Sufficient Periods for Remediated Controls Steps to Prepare for Retesting Project Management Tools for Remediation	218 218 221 222 223
Chapter 11	Taking the Mystery out of Evaluating Deficiencies Deficiencies Defined Analytical Steps for Evaluating Deficiencies Are All Exceptions Considered Deficiencies? Techniques for Aggregating Deficiencies Typical Material Weaknesses Unique Nature of IT General Control Deficiencies Market's Reaction to Process Specific versus Pervasive Material Weaknesses How to Improve Material Weakness Disclosures AS No. 4 and Reporting Whether a Previously Reported Material Weakness Still Exists Successful Communication of Deficiencies to Management and the Audit Committee Suggestions for Management's Final Assessment Report	227 228 230 235 237 239 240 242 244 245
Chapter 12	Common Areas of Concern and How to Address Them Control Options for the Use of Service Organizations What to Do with Mergers and Acquisitions Activities A Unique Solution for Managing the Tax Process How to Minimize IT Developer Access to Production Issues What to Do When Your ERP System Is Not Compatible with Your Access Controls Tips for Changing ERP Systems and Staying SOX Compliant Practical Ideas for Document Retention Requirements Thoughts on Changing Accounting Firms	251 252 258 261 263 264 266 267 269
Appendix A	Simplified Sample Entity-Level Control Matrices	271
Appendix B	COSO's Internal Controls Checklist for Entity-Level Controls	279
Appendix C	Standardized Period-End Process Control Matrix	283
Appendix D	PCAOB Staff Question-and-Answer Index	287
Appendix E	SEC Office of the Chief Accountant Frequently Asked Questions Index	291
Appendix F	Summary of Changes Made to Auditing Standard No. 2 and the Related New Guidance	295
Index		301