## CONTENTS

Preface ix  
Acknowledgments xi  
About the Author xiii  

1 The Evaluation Approach 1  
Management’s Evaluation of Internal Control 1  
Risk-Based Judgments 4  
Risk-Based, Top-Down Evaluation Approach 8  
Working with the Independent Auditors 23  

2 Internal Control Criteria 25  
Need for Control Criteria 26  
COSO Internal Control Integrated Framework 26  
Information and Communication 41  
Internal Control for Small Businesses 44  
Controls over Information Technology Systems 48  

3 Project Scoping 52  
Introduction 53  
Entity-Level Controls 54  
Identifying Significant Activity-Level Control Objectives 74  
Appendix 3A Action Plan: Identifying Significant Control Objectives 75  
Appendix 3B Example Control Objectives 77  

4 Project Planning 81  
Objective of Planning 81  
Information Gathering for Decision Making 82  
Information Sources 93  
Structuring the Project Team 100  
Coordinating with the Independent Auditors 103
8 Evaluating Control Deficiencies and Reporting on Internal Control Effectiveness 238  
Control Deficiencies 238  
Evaluating Control Deficiencies 239  
Annual and Quarterly Reporting Requirements 245  
Expanded Reporting on Management’s Responsibilities for Internal Control 249  
Coordinating with the Independent Auditors and Legal Counsel 253  
Appendix 8A Action Plan: Reporting 254  

Index 257