

EXPOSURE DRAFT SURVEY QUESTIONS

**Comments prepared by: Don Kirkendall, CIA, MPA.
September 24, 2014**

I am a retired Federal Government executive who has held auditor and audit management positions in four Federal agencies including the capstone position as Inspector General, U.S. Treasury Department. Over the past 13 years, I have performed well over 100 QAR's in many industries including banking, credit unions, NGO's such as the World Bank and UN agencies, Non-profits such as AARP and AAA, universities, energy companies, and state and local agencies for the IIA and for my own company, Inquisitor Group. I do not see any value added features to enhancing the internal auditing mission statement because the current IPPF includes those mission statements. I noted that you did not change any of the current IPPF components in your proposal. I am told that well over half the IIA membership work for IA shops of 10 or less. Why make the job harder and more complex for a majority of the internal audit community?

There are many references to the RTF, Re-look Task Force. It would have been helpful to me if the Proposed Enhancements document had included the names and credentials of the task force members. When the IIA makes substantive changes to its IPPF, it would help to know the qualifications of the drafters of the proposed changes.

I bolded the support/non support number to denote my answer to each question.

1. MISSION OF INTERNAL AUDITING

1.1 *To what extent do you support the addition of a Mission of Internal Auditing to the IPPF?*

Completely Support Do Not Support

5 4 3 2 1

Comments:

I believe that the current IPPF's components already include mission statements of the code of ethics, the definition of internal auditing, and the required standards that all IA shops are supposed to follow.

1.2 *To what extent do you agree that the proposed Mission of Internal Auditing captures what internal audit strives and/or aspires to accomplish in organizations?*

Completely Agree Do Not Agree

5 4 3 2 1

Comments:

As I stated above, I believe that the current IPPF covers the mission of internal auditing. I believe that the IIA is making a huge mistake if this proposal stands.

2. CORE PRINCIPLES FOR THE PROFESSIONAL PRACTICE OF INTERNAL AUDITING

2.1 To what extent do you support adding Core Principles for the Professional Practice of Internal Auditing as an element of the IPPF?

Completely Support Do Not Support

5 4 3 2 1

Comments:

If we assume that the core principles for the IPPF are not embodied in the current version, we are admitting that we have been operating for the past 12 years without core principles. Hopefully, nobody really believes that the current IPPF does not include core principles.

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2.2 Do you agree with the three “input-related” Principles as proposed?

2.3

Completely Agree Do Not Agree

5 4 3 2 1

Comments:

The three principles, integrity, objectivity, and competence are already included in the code of ethics. I see no reason to add another layer of principles.

2.4 Do you agree with the six “process-related” Principles as proposed?

Completely Agree Do Not Agree

5 4 3 2 1

Comments:

The six process related principles are included in the Definition of internal auditing, the attribute standards, and the performance standards. Again, why complicate the issues for the practitioner? In my opinion, we would have better adherence to the Standards if the IA Standards Board stopped complicating the standards.

2.5 Do you agree with the three “output-related” Principles as proposed?

Completely Agree Do Not Agree

5 4 3 2 1

Comments:

The output related principles mentioned above are included in the current definition of Internal Auditing.

2.6 Do you agree with the order of the 12 Principles as proposed?

Completely Agree Do Not Agree

5 4 3 2 1

Comments:

My view is that the Sections 1 and 2 of the proposed enhancement document be deleted from the exposure draft.

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1.6 To what extent do you agree with the view that all Principles must be “present and operating effectively” for an internal audit function to be considered effective?

Completely Agree Do Not Agree

5 4 3 2 1

Comments:

The issue is complex. There are scores of governance models around the world. Just in the United States alone, there are dozens of governance models. Therefore, the Quality Assessor must have the freedom to exercise sound judgment to determine the degree to which an IA Activity conforms to the IPPF.

2.7 Do you agree that the Principles, if adopted, would require guidance to help demonstrate to practitioners what the Principles might look like in practice?

Completely Agree Do Not Agree

We seem determined to create another bureaucracy in search of a mission. Please kill this monster.

5 4 3 2 1

Comments:

2. IMPLEMENTATION GUIDANCE & SUPPLEMENTAL GUIDANCE

3.1 To what extent do you support the restructure of guidance elements from “Practice Advisories” to a more comprehensive layer entitled “Implementation Guidance” as part of the framework?

Completely Support Do Not Support

5 4 3 2 1

Comments:

This is an idea that is worth implementing.

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3.2 To what extent do you support the restructure of guidance elements from “Practice Guides” to “Supplemental Guidance” as part of the framework?

Completely Support Do Not Support

5 4 3 2 1

Comments:

None

ADDRESSING EMERGING ISSUES

4.1 To what extent do you support the introduction of a new IPPF element to address emerging issues?

Completely Support Do Not Support

5 4 3 2 1

Comments:

I suggest that we continue as we are doing now. No added value that I can see. We have this covered by a committee, right?

4.2 To what extent do you agree that Emerging Issues Guidance, due to its quicker development process, should be less authoritative than Supplemental Guidance as part of the framework?

Completely Agree Do Not Agree

5 4 3 2 1

Comments:

See above.

Comments:

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Position Papers

5.1 To what extent do you support the deletion of "Position Papers" as an element of the IPPF?

Completely Support Do Not Support

5 4 3 2 1

Comments:

Agree.

3. REQUIRED AND RECOMMENDED

6.1 *To what extent do you support revision of the words “Mandatory” and “Strongly Recommended” to “Required” and “Recommended,” respectively?*

Completely Support Do Not Support

5 4 3 2 1

Comments:

Agree.

4. SUMMARY OF THE ELEMENTS OF THE PROPOSED REVISED IPPF

7.1 *Overall, to what extent do you support the changes regarding the IPPF as detailed on the previous page?*

Completely Support Do Not Support

5 4 3 2 1

Comments:

Please kill sections 1 and 2 of this exposure draft. I agree with most of the other changes.

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7.2 *To what extent do you agree that the pictorial representation adequately depicts the hierarchy and interrelationships of each element of the new proposed IPPF?*

Completely Agree Do Not Agree

5 4 3 2 1

Comments:

None

7.3 *To what extent do you agree that the pictorial representation of the proposed new IPPF is visually appealing?*

Completely Agree Do Not Agree

5 4 3 2 1

Comments

None