

Managers' Internal Control Program (MICP) Responsibilities

1. The Garrison Commander, as Senior Responsible Official (SRO) in conjunction with program guidance issued by HQ IMCOM, has responsibility to:

- a. Provide the leadership and support needed to ensure internal controls are in place and operating effectively.
- b. Designate an Internal Control Administrator (ICA) to administer the MIC Program within the U.S. Army Garrison Fort Leonard Wood (USAGFLW) and to serve as a focal point for all internal control matters.
- c. Ensure that required internal control evaluations are conducted according to the governing internal control evaluation plan (ICEP).
- d. Designate assessable units (AUs) within the reporting organization.
- e. Ensure that internal control responsibilities are explicitly covered in the performance agreements of commanders, managers and ICAs down to the Assessable Unit Manager (AUM) level.
- f. Approve an Annual Statement of Assurance (ASOA) addressed to the IMCOM-Training Director (ID-T) that incorporates input from feeder statements, evaluations, audits and other available data, and includes any identified material weaknesses for resolution, areas of concern for management's awareness, and plans of corrective action for the weaknesses/concerns.

2. The Garrison Internal Control Administrator (designated by Garrison Commander) will:

- a. Maintain overall responsibility for administering the Garrison Command's Managers' Internal Control Program (MICP).
- b. Identify the MICP training requirements for all of the various roles across the installation's MICP and disseminate the information to ensure said training requirements are met. Track the training completion and maintain training certificates.
- c. Ensure required internal control evaluations are conducted as directed by Headquarters Department of the Army (HQDA) functional proponents, HQ IMCOM and local management.
- d. Incorporate each AU's ICEP changes into the Garrison Command's ICEP, which will be updated annually.
- e. Consolidate input from internal control evaluations and prepare a MICP update for the Garrison Commander.
- f. Prepare and submit the Garrison Command's ASOA (status of IMCOM organizations' internal controls at USAGFLW).

- g. Prepare a quarterly status report of material weaknesses for IMCOM, as required.
- h. Maintain the inventory of reported internal control weaknesses and prepare a quarterly status report of material weaknesses for IMCOM.
- i. Maintain an inventory of AUMs and Functional Managers (FMs).
- j. Develop and publish a schedule for completion of internal control evaluations each fiscal year.
- k. Retain documentation on internal control evaluations conducted, annual statements of assurance submitted, and material weaknesses reported and maintain according to AR 25-400-2. Retain ASOA records for six years and three months if no material weakness is identified. If a material weakness is identified, records are maintained for six years and three months after the weakness has been resolved.

3. Assessable Unit Managers (AUMs) will:

- a. Ensure that internal controls are in place and operating effectively.
- b. Ensure all key personnel (ICAs, managers and evaluators) are appointed in writing and complete initial training within 30 days of assumption of duties by completing the computer-based training (CBT). Refresher training should be completed annually by the ICA and every 2 years for AUMs, managers and evaluators.
- c. Identify all functions and/or processes within their organization susceptible to waste, fraud, abuse or mismanagement, requiring an internal control evaluation.
- d. Develop a comprehensive, full-scope risk assessment identifying internal and external risks that may have an impact on mission accomplishment or prevent the organization from meeting objectives. The comprehensive risk assessment will rank the risks so it can be used to drive development of the ICEP. Establish or enhance internal controls to mitigate identified risks and ensure their effectiveness. Provide the Garrison ICA a copy of the risk assessment, as requested.
- e. Utilize the risk assessment to develop an internal control evaluation plan (ICEP) that describes how key internal controls within the AU will be evaluated over a 5-year period. Significant internal controls are those controls that:
 - (1) Are identified as key internal controls by HQDA functional proponents, HQ IMCOM or local managers.
 - (2) Pertain to the Department of Defense (DoD) high-risk areas identified by Office of Management and Budget (OMB).
 - (3) Pertain to any other high-risk areas identified by DoD or Army leadership.
 - (4) Pertain to areas of vulnerability that AUMs have identified.

- (5) Directly support the accomplishment of Army goals.
- f. Ensure all needed internal control evaluations are conducted:
 - (1) In accordance with (IAW) the approved 5-year ICEP.
 - (2) IAW the guidance contained in this memorandum and AR 11-2, RAR 26 Mar 12.
- g. Certify all internal control evaluations utilizing DA Form 11-2.
- h. Maintain a copy of each completed internal control evaluation and DA Form 11-2 (Internal Control Evaluation Certification Statement), to include documentation to support the evaluation for a period of six years and three months (for audit readiness). Provide a report to the Garrison Internal Control Administrator stating the MICP duties have been added to the performance objectives of personnel who have been assigned roles in the MICP.
- i. Compose and sign an ASOA feeder statement addressed to the Garrison Commander. The statement certifies the adequacy of internal controls within the organizational unit and identifies any areas of concern or material weaknesses and plans of corrective action for the weaknesses/concerns. ASOA records must be maintained for six years and three months if no material weakness is identified. If a material weakness is identified, records are maintained for six years and three months after the weakness has been resolved.
- j. Provide information to the Garrison ICA as requested to facilitate preparation of a MICP update for the Garrison Commander.
- k. Appoint your Organizational ICA and provide the name and telephone number to the Garrison ICA (to include changes as they occur).
- l. Identify and report to the Garrison Commander:
 - (1) Any material weakness(es) in internal controls.
 - (2) Your established and implemented plans to correct the weakness(es) found.
 - (3) Your progress in executing those plans until the material weakness(es) are corrected.
 - (4) Copies of the weakness(es) and plans for correction to the Garrison ICA.

4. The Organizational Internal Control Administrator will:

- a. Maintain overall responsibility for ensuring the implementation of an effective MICP within the reporting organization.
- b. Disseminate guidance and provide technical assistance to personnel that have internal control responsibilities and roles within their organization.

- c. Ensure MICP training requirements are met by all personnel within the organization. Track and record training completion, maintain training certificates and provide copies to the Garrison ICA.
- d. Provide direction and assistance to AUMs regarding the development of risk assessment, 5 year ICEP, test plan, and feeder statements for their organization.
- e. Provide copies of all MICP deliverables to the Garrison ICA for consolidation into the Garrison Command's ICEP, which will be updated annually.
- f. Coordinate and gather the organization's internal control evaluations. Provide copies to the Garrison ICA via the USAGFLW MICP SharePoint site ensuring all required backup documentation is included.
- g. Coordinate and gather the organization's feeder statements. Provide copies to the Garrison ICA ensuring all required backup documentation is included.
- h. Retain documentation on internal control evaluations conducted, annual statements of assurance submitted, and material weaknesses reported and maintain according to AR 25-400-2. Retain statement of assurance records for six years and three months after submission; if a material weakness has been reported, then the records are retained for six years and three months after the weakness has been resolved and HQDA no longer requires reports on the status.

5. Directors and Staff Officers not identified as AUMs, but designated as FM's will:

- a. In coordination with AUMs, identify all functions and/or processes within their organization susceptible to fraud, waste, abuse or mismanagement, requiring an internal control evaluation.
- b. In coordination with the AUMs, identify internal and external risks that may prevent their organizations from meeting their objectives. Establish or enhance internal controls to mitigate identified risks and ensure their effectiveness. Ensure all MICP related information is provided to the Garrison ICA, as required.
- c. In coordination with the AUMs, develop AU ICEP to schedule required internal control evaluations over a 5-year period.
- d. Conduct internal control evaluations:
 - (1) IAW the schedule published annually by the Garrison ICA.
 - (2) IAW the guidance contained in this memorandum and AR 11-2.
 - (3) Provide a copy of the evaluation, with required supporting documentation and a completed Internal Control Evaluation Certification, DA Form 11-2, to the AUM for certification.
- e. Identify and report all internal control weaknesses through the AUM to the Garrison ICA; establish and implement plans to correct the weaknesses; track progress in executing those

plans until the material weaknesses are corrected; and provide copies of the weaknesses and corrective action plans to the Garrison ICA.

6. Internal Review. The Internal Review Director and/or Chief will:

- a. Provide technical advice, assistance and consultation on internal controls and evaluation methods to AUMs as necessary.
- b. Evaluate the effectiveness of internal controls, the adequacy of internal control evaluations and actions taken to correct material weaknesses, during the normal course of reviews.
- c. Identify and recommend any internal control or systemic weaknesses that may merit reporting as material weaknesses based on analysis of IR reports and external audit reports. Notify the SRO, applicable AUMs and ICAs on the status of external inspection and audit findings and recommendations that may warrant reporting as a material weakness in the annual statement of assurance. Provide a copy to the Garrison ICA in the 4th Qtr each FY, for information to be included in Garrison ASOA.
- d. Review the Garrison Commander's ASOA and provide an assessment of the thoroughness and validity of the statement.

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Enclosure 2 to Garrison Policy 06, Managers' Internal Control Program

LIST OF ASSESSABLE UNITS/MANAGERS

Assessable Unit: **INSTALLATION SUPPORT and SPECIAL STAFF OFFICES**

Assessable Unit Manager: Deputy Garrison Commander

The following positions are Managers for the above AU:

Religious Support Officer

Plans, Analysis and Integration Officer

Equal Employment Opportunity Officer

Internal Review Officer

Public Affairs Officer

Safety Officer- Dual Organization

Assessable Unit: **DES**

Assessable Unit Manager: Director, Emergency Services

DFMWR (Includes ACS)

Assessable Unit Manager: Director, Family, Morale, Welfare, and Recreation

DPTMS

Assessable Unit Manager: Director, Plans, Training, Mobilization and Security

DPW

Assessable Unit Manager: Director, Public Works

DHR

Assessable Unit Manager: Director, Human Resources

RMO

Assessable Unit Manager: Director, Resource Management

SJA- Dual Organization

Assessable Unit Manager: Director, Staff Judge Advocate

GAO Standards for Internal Control

COMPONENTS	PRINCIPLES
<p>Control Environment –</p> <p>The control environment is the foundation for an internal control system. It provides the discipline and structure, which affect the overall quality of internal controls. It influences how objectives are defined and how control activities are structured. The oversight body and management establish and maintain an environment throughout the entity that sets a positive attitude toward internal control.</p>	<ol style="list-style-type: none"> 1. The oversight body and management should demonstrate a commitment to integrity and ethical values. 2. The oversight body should oversee the entity's internal control system. 3. Management should establish an organizational structure, assign responsibility, and delegate authority to achieve the entity's objectives. 4. Management should demonstrate a commitment to recruit, develop, and retain competent individuals. 5. Management should evaluate performance and hold individuals accountable for their internal control responsibilities.
<p>Risk Assessment –</p> <p>Having established an effective control environment, management assesses the risks facing the entity as it seeks to achieve its objectives. This assessment provides the basis for developing appropriate risk responses. Management assesses the risks the entity faces from both external and internal sources.</p>	<ol style="list-style-type: none"> 6. Management should define objectives clearly to enable the identification of risks and define risk tolerances. 7. Management should identify, analyze, and respond to risks related to achieving the defined objectives. 8. Management should consider the potential for fraud when identifying, analyzing, and responding to risks. 9. Management should identify, analyze, and respond to significant changes that could impact the internal control system.
<p>Control Activities –</p> <p>Control activities are the actions management establishes through policies and procedures to achieve objectives and respond to risks in the internal control system, which includes the entity's information system.</p>	<ol style="list-style-type: none"> 10. Management should design control activities to achieve objectives and respond to risks. 11. Management should design the entity's information system and related control activities to achieve objectives and respond to risks. 12. Management should implement control activities through policies.

<p>Information and Communication –</p> <p>Management uses quality information to support the internal control system. Effective information and communication are vital for an entity to achieve its objectives. Entity management needs access to relevant and reliable communication related to internal as well as external events.</p>	<p>13. Management should use quality information to achieve the entity's objectives.</p> <p>14. Management should internally communicate the necessary quality information to achieve the entity's objectives.</p> <p>15. Management should externally communicate the necessary quality information to achieve the entity's objectives.</p>
<p>Monitoring –</p> <p>Finally, since internal control is a dynamic process that has to be adapted continually to the risks and changes an entity faces, monitoring of the internal control system is essential in helping internal control remain aligned with changing objectives, environment, laws, resources, and risks. Internal control monitoring assesses the quality of performance over time and promptly resolves the findings of audits and other reviews. Corrective actions are a necessary complement to control activities in order to achieve objectives.</p>	<p>16. Management should establish and operate monitoring activities to monitor the internal control system and evaluate the results.</p> <p>17. Management should remediate identified internal control deficiencies on a timely basis.</p>

Managers' Internal Control Program (MICP)

Training Requirements and Training Report

MICP Training Requirements

	MICP Additional Duty Role / Title					
ALMS Course Name	Senior Responsible Official	Assessable Unit Manager	Internal Control Administrator	Manager	Evaluator	All IMCOM employees
FREQUENCY	2 YRS	2 YRS	ANNUAL	2 YRS	2 YRS	ANNUAL
The Army Managers' Internal Control Program (MICP) – Senior Responsible Official Course	X					
The Army MICP – Assessable Unit Manager Course		X				
The Army MICP – Internal Control Administrator Course (Basic or Refresher)			X			
The Army MICP – Managers Course				X		
The Army MICP – Personnel Conducting Evaluations Course					X	
IMCOM PowerPoint Slides "MICP Training"						X

MICP Training Report

Appendix F - FY19 Managers' Internal Control Program Training Report							
Reporting Organization:	Assistant Secretary of the Army, Financial Management and Comptroller						
TYPE / METHOD OF TRAINING	WHO WAS TRAINED AND NUMBER						
LOCAL TRAINING PROVIDED BY ICA:	SRO#	MGR#	ICA#	ICA Refresher#	AUM#	Personnel Conducting Evaluations#	IMCOM Internal Training
Classroom Presentation							
Desk-Side Briefing							
Telephonic Briefing							
Video-teleconference							
Local MICP Conference							
Training Videos							
Electronic Briefing Charts							
EXTERNAL TRAINING RECEIVED:							
ALMS Web-Based Training							
Army MICP Conference (ASA(FM&C))							
Army Managers Internal Control Administrator Course - Graduate School (Classroom)							
Army Managers Internal Control Administrator Course Graduate School (On Site)							
Managers Responsibility for Internal Controls (OMB Circular A-123) - Graduate School (Classroom)							
Other courses or schools with a session on MICP (Provide course names and training source)							
TOTAL BY ROLE:	0	0	0	0	0	0	0
TOTAL FOR ORGANIZATION	0						
Instructions:							
1. Provide the number of hours completed for each course listed above.							
2. Provide acceptable documentation for each training course completed. The forms of acceptable documentation are listed on the "acceptable documentation tab,							

Managers' Internal Control Program (MICP)

Test Plan

Test Plan - Control Background, Test Procedures, Test Results, and Evaluation			
1	DoD Entity		4 Preparer
2	Financial Statement Line Item(s)		5 Preparer's Phone #
3	Business Cycle(s)/Assessable Unit/Sub-Assessable Units		6 Documentation Location
7	Financial Statement Assertion(s)		
8	Key Risk(s) of Material Misstatement (ROMM)		
9	Financial Reporting Objective(s) (FROs)		
10	Control Activity Description		
11	Test Objective(s)		
12	Control Type		
13	Control Number		
14	Control Frequency		
15	Testing Period		
16	Test Method		
17	Transaction Universe and Reconciliation		
18	Sampling Technique		
19	Sample Size and Basis		
20	Acceptable Number of Deviations/Tolerable Misstatement		
21	Location of Testing		
22	Test Description		
23	Test Procedures and Testing Attributes	Review supporting documentation to determine:	
24	Test Results	Pass/Fail/NA/Delay/Test Terminated	
Evaluation of Test Results			
25	Control Effectiveness Conclusion		
26	Tester's Signature & Date		
27	Supervisor's Signature of Acceptance & Date		