

A Large Bank

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Background

- A full service bank that has been in business for over 70 years and has a very active continuous audit program
- The CA program is in IT / IA and has over 10 people engaged
- It monitors over 5 million customer accounts on a daily basis
- It send out about 6 thousand alarms a month



Continuous Audit at our Bank

Mission

- Automatically evaluate risks and controls on a continuous basis in order to identify exceptions and anomalies, trends and risk indicators.
- Issue opinions about controls, risk assessment for top management, audit committee and other interested parties. Contribute to corporate Governance of the Conglomerate.

Scope

 All products, processes and services in the conglomerate that allow for the systemic extraction and analysis of data generated by Information Technology.

Approach

- Extraction and analysis of information of the products, processes and services that exist in the Conglomerate using IT to improve timeliness and scope of Internal audit work..
- Inform events of non-compliance in these being effective on the generation of products needed for the prevention and correction of risks and events.

PRODUTIVITY WITH QUALITY AND EFFICIENCY



Continuous Audit at our Bank

There are currently 18 procedures that cover the following scope:

- **DETECTIVE:** Routines that detect potential errors
- **DETERRENT:** Routines that inhibit inappropriate events and behaviors
- FINANCIAL: Routines that reduce or avoid financial losses
- **COMPLIANCE:** Routines that help compliance with existing laws, policies, norms and procedures.



Continuous Audit at Our Bank

Daily Routines - Branches	Approach			
	Detective	Deterrent	Financial	Compliance
1. Advances	x	x	x	x
2. Excess over credit limit	x	x	x	x
3. Returned checks	x	x	x	
4. Federal tax payment cancelations	x	x	x	
5. TED Emissions	x	x	x	x



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Rotinas Diárias - Rede de Agências	Abordagem			
	Detective	Preventive	Financial	Compliance
1. Accounts open 30/60 days without posting and with X% utilization of the credit limit (monthly)	x	x	x	
2. Debits in accounts without credits over 180 days (Insurance, etc.) (Bimonthly)	x	х	x	х
3. Accounts dormant over 180 days (Seasonal)	x	x	x	x
4. Returned checks self-emitted in new accounts (Bimonthly)	x	x	x	x
5. Savings account with more thatn 5 deposits a months (Tri-monthly (Trimestral)	x	x	x	
6 . Delivery of cehckbooks fo rclients in the CCF (Monthly)	x	x	x	x

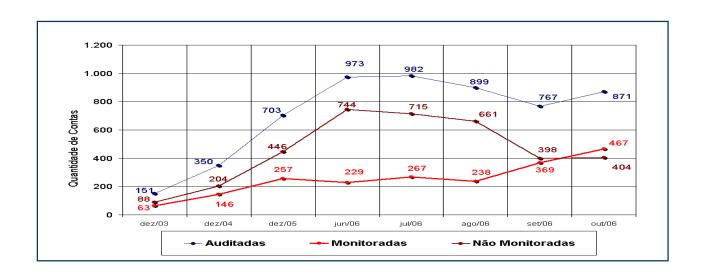


Continuous Audit at our Bank

Daily Routines	Abordagem			
	Detective	Preventive	Financial	Compliance
1. Adivances to depositors (excess) (Bimonthly)	x	x	x	x
2. Returned checks (Bimonthly)	x	x	x	x
3. Restricted & Returned checks (Bimonthly)	x	x	x	
4. Wrong personal data in checks (Bimonthly)	x	x	x	
5. More than two checking accounts (Bimonthly)	x	x	x	x
6. Too much monthly expenses (Bimonthly)	x	x	x	x
7. Total debt larger than X% on monthly income. (Bimonthly)	x	x	x	x

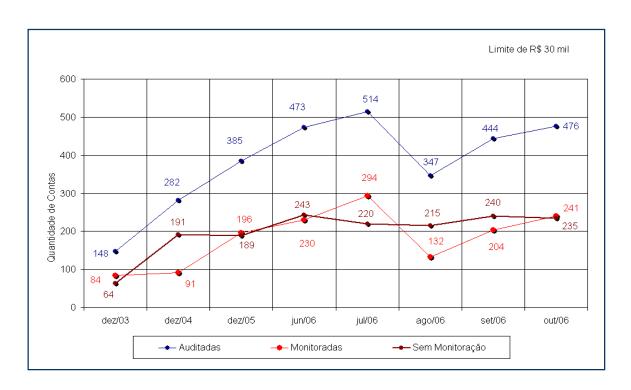


Adiantamentos a Depositantes





Excesso sobre Limites



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The audit program

Tools

- Routines developed in FOCUS
- MS-Office (Access; Outlook; Word; Excel; Power Point; Visual Basic)
- Data Warehouse
- ACL

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What we want

- Audit and monitor closely the key bank controls
- Improve timeliness
- Improve on risk management
- Increase internal audit's involvement with the critical areas of the bank
- Improve audit effectiveness



Some considerations

Basis

- We are finally in the real-time economy
- In this economy the key issue is to reduce within and between process latency
- The basic management process requires
 - Real time measurement
 - Terms of comparison (models)
 - Significant variance comutations
 - lead to alarms
- Conceptually we need to re-think certain things

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Some re-consideration

- What is monitoring vis-à-vis continuous assurance?
- What king of partnership does internal audit develop with the operational areas?
- Is this form of continuous assurance actually a control?
- How about independence?

