

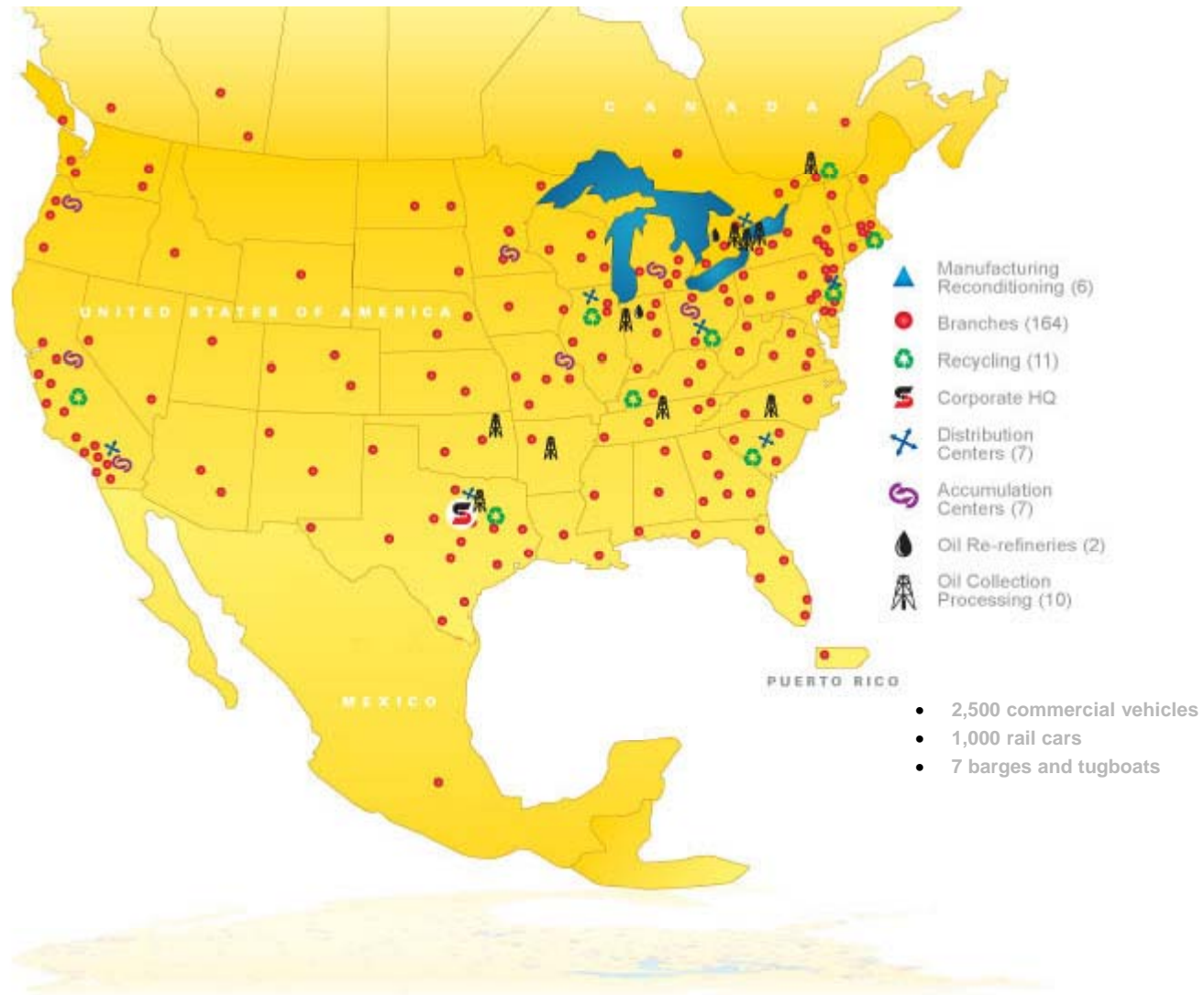
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# **Impactful Follow Up: The Key to Internal Audit Success**

Thursday, April 7, 2011  
10:30 – 11:30

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*Supervisor Internal Audit*

# Safety-Kleen, Inc. Infrastructure



# Impactful Follow Up: The Key to Internal Audit Success

- How to drive practical and actionable risk mitigation plans
- How and when to engage management in the risk mitigation process
- How to identify and address quick fixes and develop long-term solutions
- How to report results and evaluate Internal Audit's impact

# Why Perform Follow Up?

- International Standards For The Professional Practice Of Internal Auditing (Performance Standard #2500)
- To maximize internal audit's impact within the organization
- To assist management in the risk mitigation process

# Why Perform Follow Up?



# Safety-Kleen Internal Audit KPIs

- Number of Projects Completed - 50%
- Solutions Implemented - 25%
- IIA Quality Assessment - 15%
- Customer Service - 10%

## Follow Up Process - Issues

- Not getting management's "buy-in". Auditors and management may have different perspectives on risks
- Processes and organizations change as do risks and management's risk appetite
- Management has competing priorities with addressing risks
- Difficulty to overcome cultural and behavioral challenges within the organization

# Applying Projects to the Company's Goals

## SK Goals

1. To be number one in our markets and in profitability
2. To provide, in a timely manner, accurate financial information to all of our stakeholders
3. To provide our employees with the information and tools necessary to achieve outstanding performance every day
4. To recognize and reward superior performance with money and opportunity
5. To be unwavering in our commitment to the environment

## SK Audit Projects

**Oil Measurement Review**

**Sarbanes-Oxley**

**Standard Operating Procedures (SOP)**

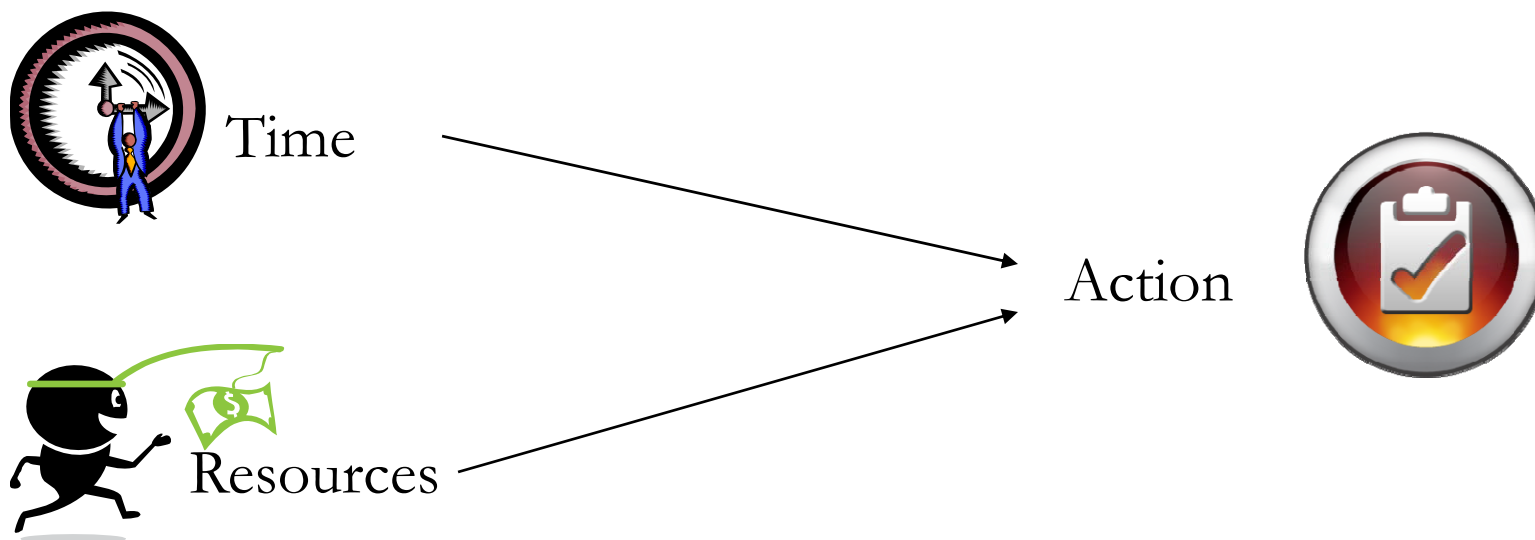
**Commissions Review**

**Environmental Management System**



# Practical and Actionable Plan

The truth is, people can not take action unless they have time and resources. Therefore, when recommending a solution ask yourself: “Does cost align with risk?”

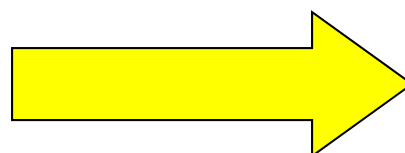


## Practical and Actionable Plan

- Understand management's risk appetite
- Get management's "To Do" list. How's addressing risk prioritized on that list?
- Think like a business person. Remember, most Executives were not Auditors earlier in their career
- Align with people empowered to make decisions

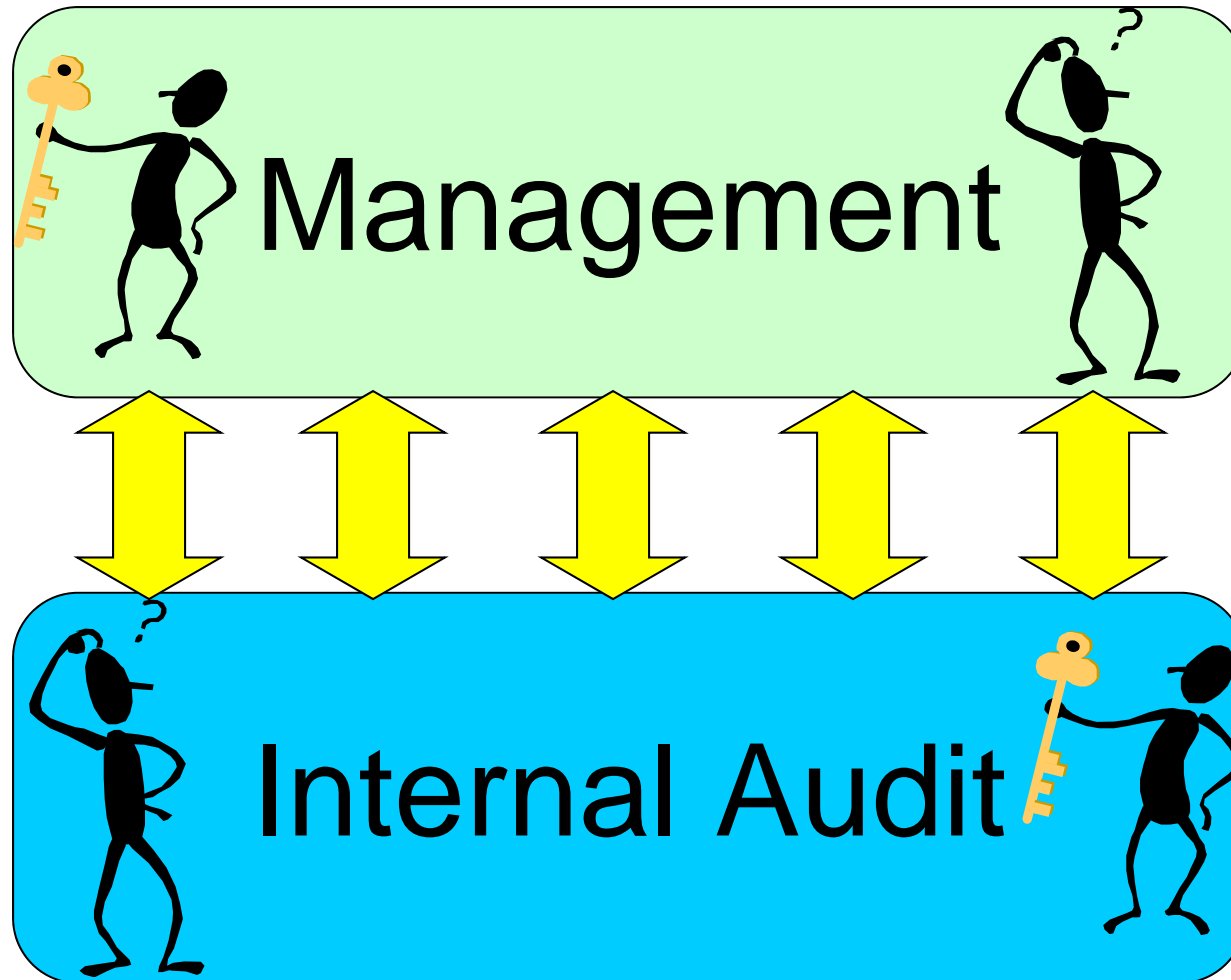
# Engage Management in the Process

Get management's involvement and input throughout the engagement:



- **Risk Assessment** – Is management aware of the issues and working to address them?
- **Fieldwork** – Communicate issues as they arise. Discuss solutions real-time. Some solutions can be implemented prior to engagement end.
- **Reporting** – When writing recommendations, gain management's input. Are your recommendations aligned with risk?

# Engage Management in the Process



# Engage Management in the Process

- Partner with decision makers and executors
- Communicate the risks and potential impact
- Become a “go-to” advisor
- Get management to own the process and implemented solutions

# Quick Fixes vs. Long Term Solutions

## American Heritage Dictionary

**Quick Fix** - a hastily contrived remedy that alleviates a problem only for the time being

**VS.**

**Long Term** - involving, maturing, or being in effect for a long time

**Solution** - the answer to or disposition of a problem



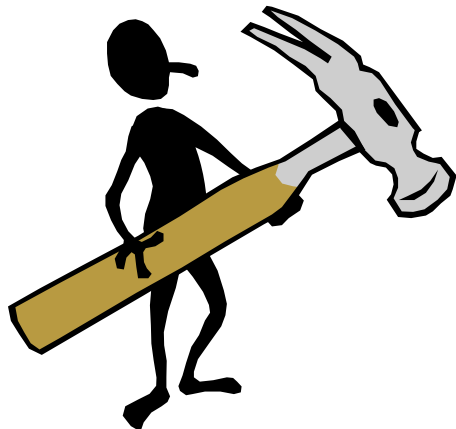
# Quick Fixes vs. Long Term Solutions

- Use cost vs. benefit approach
- Identify quick fixes throughout the engagement, and implement them quickly
- Establish deadlines for the long-term solutions and continue to follow up
- Engage throughout the solution implementation process to ensure other significant risks are not overlooked

# Quick Fixes vs. Long Term Solutions

## Quick Fix

1. Manual preparation of reports to generate visibility
2. Terminate unauthorized system access during annual review
3. Train employees on Policies & Procedures to ensure documents are approved according to the Expenditure Matrix



## Long Term Solution

**Embedded system reports that automatically generate visibility**

**Install system security software to identify conflicts in segregation of duties**

**System routes documents for approval according to the Expenditure Matrix**





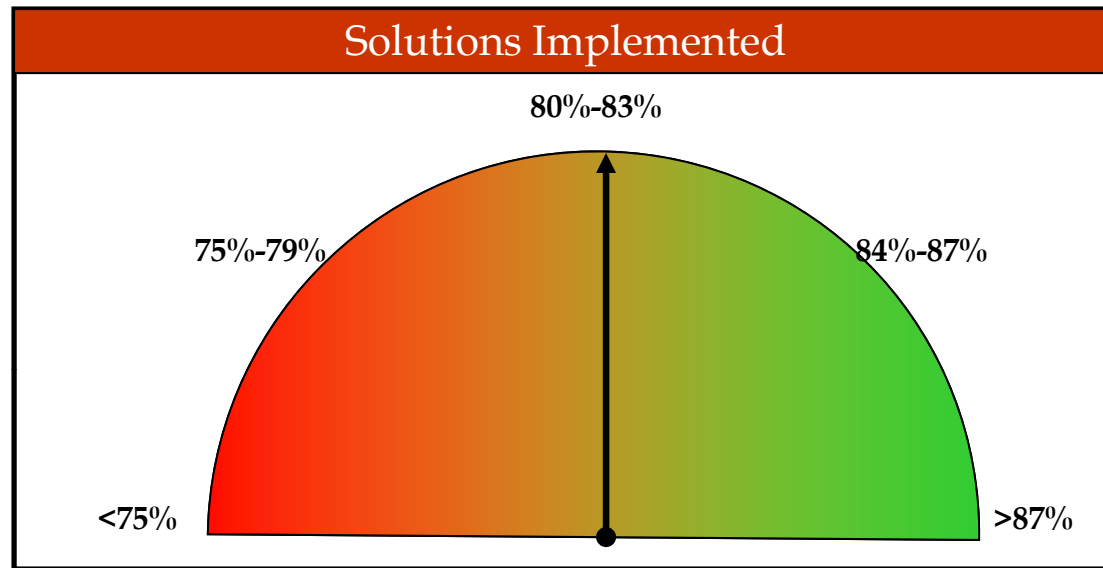
# Reporting Results - Internal Audit

#	Risk	Management Action Plan	Due Date	Status	Process Owner	Comments	I A
<b>2009 Oil Measurement Review (June 5, 2009)</b>							
1	Lack of verification of volume and H2O at the rail-site prior to OSSR offload may lead to inaccuracy of daily volume reporting	Enhance rail-site supervision and the requirement that someone other than the OSSR verify volumes and H2O content in the railcar prior to shipping to non-branches.	10/31/09	Risk Accepted	John Smith	Rail sites managed by 3 <sup>rd</sup> parties are not willing to validate volumes and H2O due to employees safety associated with climbing our trucks. Due to low frequency of oil offload at the company-owned sites, it's not viable to keep a full time employee on the company managed rail sites - John Smith 10/31/09	V M
2	Decentralization of files leads to difficulty to effectively manage employees personnel files	Centralize employee personnel files at one location. HR Corporate is to manage all personnel files.	06/30/09 12/31/10 01/31/11	In - progress	Cindy Jones	Employee File Centralization software will significantly improve management of the Company's documents at the centralized location. Roll-out occurred June 2010 and training occurring across areas. All facilities scheduled for incorporation by 01/31/11. - Cindy Jones 11/10/10	F C
3	Information conveyed to management may be ambiguous or confusing and may lead to drawn conclusions that are inconsistent with actual results.	Update Dashboard report formatting to make them reader-friendly for management to better define action plans	09/30/10	Closed	Jane Doe	The dashboard update was completed in November 2010. The dashboard is distributed to executive management recapping EHS results by company, region, area and branches. - Jane Doe 11/12/10	P M

# Reporting Results - Audit Committee

- Summary of recently completed projects
- Report on Top 20 Risks:
  - Risk
  - Management Action Plan
  - Status – actions taken, days open, etc.
  - Significantly overdue items
  - Management Risk Acceptance
  - Re-opened items

# Evaluating Internal Audit's Impact



Percentage solutions implemented may be a good indicator of internal audit's impact

# Maximizing Internal Audit Impact

- Treat Follow Up process as an on-going process to maximize solution implementation
- Get your team involved in the Follow Up process
- Ensure that closed issues remain closed
- Periodically readdress accepted risks

# Conclusion

1. Thoroughly know your industry, company and people
2. Align with the Company's vision and goals
3. Partner with management, and become their "go-to" person
4. Think big picture and shoot for the long-term solutions
5. Create a team-work environment
6. Have fun!

