

Attachment C



Scoping Information Technology General Controls (ITGC)

Type: Executive Summary Report

Date: 1/25/2007

Total invitations sent: 11,118

Total number of responses collected: 532 (4.79%)




1: What percentage of your organization's SOX 404 costs relate to ITGC?

(Respondents could only choose a **single** response)

Response	Chart	Frequency	Count
Less than 10%		18.7%	98
11-20%		25.2%	132
21-30%		29.6%	155
31-40%		12.6%	66
41-50%		8.6%	45
More than 50%		5.3%	28
Not Answered			8
		Valid Responses	524
		Total Responses	532

2: How do you feel about your organization's costs related to scoping ITGC for SOX 404?

(Respondents could only choose a **single** response)

Response	Chart	Frequency	Count
The costs are in line with what should be spent		41.5%	219
The costs are too high		48.7%	257
Neither (explained below)		9.8%	52
Not Answered			4
		Valid Responses	528
		Total Responses	532

2a: Additional comments regarding the organization's costs related to scoping ITGC for SOX 404:

Response
We are not a public company and therefore do not fall under Sox
Government Agency not subject to SOX at this point
No sox requirement
No sox requirements for company
Not enough spent on this. however, we are voluntary
SOX 404 does not apply to the school district
Glad to integrate into SOX process - more efficient for company
Costs are marginally too high
We are in Year One but we estimate costs to be 20-30%.
Overall costs are too high, but relative to non-IT costs, ITGC costs are in line
Not sure where the cost figure should be.
The costs were very high, but we did benefit. My issue is with the number of systems that were determined to be "in-scope" based on input from our external auditors.
Educational non-profit institution, but still interested in ITGC information

Attachment C



I don't feel there is good communication between external auditors for ITGC and operational controls, so the expense may be low.
We co-source the ITGC testing, so the cost will be higher than in house.
Not enough value is placed on the role of ITGC
We are a government agency and SOX does not apply
The learning curve is past its apogee and has now helped us to reduce the costs.
Not enough focus on ITGC to date
SOX compliance is not required
We don't have enough resources to adequately scope all ITGC needed.
We have not scheduled it yet as a Private Company.
We do not have SOX costs - we are a private company
Not doing enough around ITGC
Costs were due to remediation efforts
No funding for this
Our effort in this area needs to be more robust
ITGC costs are higher because they require a specific resource skill set
Not required to comply with SOX
Private company not subject to SOX
The costs are as low as we think they can be, given the requirement to evaluate general computer controls. However, given that backup/recovery has little to do with financial reporting, our overall costs could be reduced if this area was excluded.
SOX 404 do not apply to us.
We do not have to comply with SOX.
We simply don't agree with the scope that our external auditors require. If we relate overly broad scope to the excessive audit procedures required to fulfill it, then I suppose you could say that scoping costs are too high.
Probably disproportionately low
I think we need to spend more and rely on the scoping more
We are a not-for-profit and doing "lite-SOX"

External auditors get too focused on the controls as they apply to the financial systems. They ignore or minimize the controls relating to the running the business. Other systems are far more critical than the financial apps.

SOX is not currently applicable to my organization - it's NFP

We do not do enough in the area of ITGC

Do not have to comply with SOX

Not a company which falls under SOX 404 rules.

Hard to determine since the PCAOB SOX recommendations keep changing. They are moving in the right direction though.

Not affected

As a non-profit entity, the organization has not yet developed a full blown plan for the identification and testing of ITGCs.

We do not have to comply with SOX at this time.

As an OCC regulated bank, this is woven into our compliance program

The concern is overall cost on SOX404 and the efficient use of resources.

ITGC are extremely important for us whether or not they deal with SOX

Attachment C



3: Please rate how valuable you think guidance on scoping of ITGC would be:







		(1) Not Valuable At All	(2)	(3)	(4)	(5)	(6) Extremely Valuable	Total	Mean
How valuable do you feel guidance on the efficient scoping of ITGC would be?	Count	6	9	44	62	153	258	532	5.107
	% by Row	1.1%	1.7%	8.3%	11.7%	28.8%	48.5%	100.0%	
Total	Count	6	9	44	62	153	258	532	N/A
	% by Row	1.1%	1.7%	8.3%	11.7%	28.8%	48.5%	100.0%	

4: Please rate how you feel about the following efficiency factors related to scoping ITGC:

		(1) Not Efficient At All	(2)	(3)	(4)	(5)	(6) Extremely Efficient	Total	Mean
How do you feel about your organization's efficiency in scoping ITGC?	Count	28	64	172	151	74	12	501	3.429
	% by Row	5.6%	12.8%	34.3%	30.1%	14.8%	2.4%	100.0%	
How do you feel about your external auditor's efficiency in scoping ITGC?	Count	61	114	195	114	39	6	529	2.951
	% by Row	11.5%	21.6%	36.9%	21.6%	7.4%	1.1%	100.0%	
Total	Count	89	178	367	265	113	18	1030	N/A
	% by Row	8.6%	17.3%	35.6%	25.7%	11.0%	1.7%	100.0%	

5: Please select the title that best fits your current position:

(Respondents could only choose a **single** response)

Response	Chart	Frequency	Count
Chief Audit Executive (CAE)		32.1%	168
Audit Director		20.0%	105
Audit Manager		19.8%	104
IT Audit Director		6.9%	36
IT Audit Manager		10.7%	56
Other (specified below)		10.5%	55
Not Answered			1
		Valid Responses	524
		Total Responses	525

5a: Please select the other title that best fits your current position:

Response
Finance
IT Security Staff
VP Technology Controls and Compliance
IT Audit Supervisor
Audit Senior
Senior Internal Auditor
Director of Compliance
SOX 404 Manager
Compliance Manager
Director Internal Control

Attachment C



SOX 404
Compliance Director
Internal Control Manager
Senior Exec
Internal Auditor
Internal control manager
Internal Controls Senior Manager
Internal Audit
Accounting & SOX Manager
SOX Project Mgr/Assistant Controller
VP Audit
Compliance Manager
Staff
Controller
Consultant
Sr. Auditor
Audit Supervisor
Senior Leader, IT Audit
Director, Financial Controls
IT Supervisor
Asst. VP, IT Audit
Risk Manager
SOX IT Specialist
Sarbanes Oxley Compliance Manager
IT Compliance Manager



GLOBAL AUDIT INFORMATION NETWORK

Validate Your Direction

Director, Internal Controls
CEO
Sr. Manager Internal Accounting Controls
IT Auditor
IT Risk Analyst
SOX Manager
World-Wide SOX Director
Accounting manager
Financial Compliance
Consultant
SOX Team ITGC Liaison
Controller
SOX Auditor
Sr. IT Audit Mgr (Leading IT Audit function)
SOX Auditor
Staff
Internal Assurance, IMT Specialist
General Partner