

Internal Audit

Quality Assurance Self-Assessment

with

Independent Validation

February 21-27, 2013

March 29, 2013

This Independent Validation of the Quality Assurance Self-Assessment of the ECSD Office of Internal Auditing was performed in accordance with The Institute of Internal Auditors (IIA) Quality Assessment Manual, 6th Edition. The primary purpose of a Quality Assessment is to determine the internal audit function's conformance with the International Standards for the Professional Practice of Internal Auditing. There are three possible outcomes of the OA: the internal audit program generally conforms, partially conforms or does not conform with the Standards.

Mr. Jeff Bergosh, Chair, Escambia County School District School Board Mr. Malcolm Thomas, Superintendent, Escambia County School District Mr. Tod Wilson, Chair, Escambia County School District Audit Committee Mr. David Bryant, Director, Escambia County School District, Office of Internal Auditing

Greetings:

I have completed an independent validation of the Escambia County School District (ECSD) Office of Internal Auditing (OIA). The primary objective was to verify the assertions made in the ECSD OIA self-assessment report regarding its conformance to the Institute of Internal Auditors (IIA) Standards for the Professional Practice of Internal Auditing.

In acting as independent validator, I am fully independent of ECSD and have the necessary knowledge and skills to undertake this engagement. The validation, conducted between February 21- 27, 2013 consisted primarily of reviewing and testing the self-assessment. Additionally, I interviewed other audit team members and several key administrators. These interviews helped me gain a better understanding of the internal control environment within which the ECSD OIA operates.

I have reviewed the results of the validation with Chief Audit Executive (CAE) David J. Bryant, Director of Internal Auditing. As independent validator, I concur with the OIA's self-assessment which stated that OIA practices "Generally Conform" with the IIA Standards for the Professional Practice of Internal Auditing. ("Generally Conforms" is the highest rating the IIA Standards permit.) This report provides additional information on the purpose and scope of the review along with recommendations to strengthen the control environment.

Respectfully, Betsy Bowers, CIA, CFE, CGFM, CIG Independent Validator

Table of Contents

Overall Opinion	4
Acknowledgments	4
Conformance with IIA Standards	5
Background	6
Scope, Objectives & Methodology	6
Commendable Areas	
Matter for Consideration by ECSD Board, Management and the Audit Committee8-1	.1
Opportunities for Continuous Improvement - Office of Internal Auditing8-1	.7
Appendix I - Engagement Methodology1	.8
Appendix II - List of Stakeholders Interviewed	.9
Appendix III - The IIA Research Foundation – Internal Audit Capability Model Matrix2	20
Appendix IV - Biography of Reviewer	!1

Overall Opinion

I was contacted by the Escambia County School District (ECSD) to conduct an independent validation of the Office of Internal Auditing (OIA) self-assessment. Based on the information evaluated, it is my opinion that the ECSD OIA "**Generally Conforms**" with the Institute of Internal Auditors' (IIA) International Standards for the Professional Practice of Internal Auditing (the *Standards*). This opinion, the highest of the three possible ratings, indicates that policies, procedures, and practices generally comply with the *Standards*.

Overall, OIA is independent, objective, and able to render impartial and unbiased opinions on the control environment. The OIA Director and staff are qualified, proficient, and knowledgeable in the areas they audit.

Surveys and interviews conducted during the independent validation indicate that management considers the OIA to be a useful part of the overall operations and finds that the audit process and audit recommendations add value and help improve operations.

In addition to the overall opinion, this document contains commendable practices, as well as, recommendations to further enhance the audit function and its interaction within the overall control environment.

Appendix III is a maturity model developed by the IIA that is designed for commercial enterprises. It is presented for informational purposes only. There are other models perhaps more suited to the District's circumstances that could be used as a basis for discussion with senior management, the School Board, and the Audit Committee about the Office of Internal Audit's current and desired future state.

Acknowledgments

I appreciate the courtesy and cooperation extended to me by the Escambia County School District. I would also like to thank each person who completed a survey and/or participated in the interview process. The feedback from this process provided valuable information regarding the operations of the ECSD OIA and its relationship with management.

Conformance with IIA Standards

Generally Conforms means that IA has a charter, policies and processes that are judged to meet the spirit and intent of the IIA *Standards* with some potential opportunities for improvement.

Partially Conforms means deficiencies in practice are noted that are judged to deviate from the spirit and intent of IIA *Standards*, but these deficiencies did not preclude IA from performing its responsibilities in an acceptable manner.

Does Not Conform means deficiencies in practice are judged to be so significant as to seriously impair or preclude IA from performing adequately in all or in significant areas of its responsibilities. Overall, the ECSD Office of Internal Audit was judged to Generally Conform to IIA *Standards*. While improvement opportunities remain in various areas, they did not preclude this assessment. I concluded the following individual standards Generally Conform to the IIA *Standards*.

Attribute Standards

1000—Purpose, Authority and Responsibility

1100—Independence and Objectivity

1200—Proficiency and Due Professional Care

1300—Quality Assurance and Improvement Program Performance Standards

- 2000—Managing the Internal Audit Activity
- 2100—Nature of Work
- 2200—Engagement Planning
- 2300—Performing the Engagement
- 2400—Communicating Results
- 2500—Monitoring Progress
- 2600—Resolution of Senior Management's Acceptance of Risk

In my opinion, the following *Standards* are judged as Partially Conforms to the IIA *Standards*. See discussion under Opportunities for Continuous Improvement.

> 2010—Planning 2120—Risk Management

Background

The IIA *Standards* require that internal audit functions obtain an external quality assurance review to assess compliance with the *Standards* and to appraise the quality of operations. The review may be a full external quality assurance review (QAR), peer reviews, or independent validation of a self-assessment (SAIV), and should occur at least once every five years. The previous SAIV was performed in 2007 and resulted in a rating of "Generally Conforms."

The quality assurance review/validation field work was performed between February 21-27, 2013 in accordance with the IIA's Quality Assessment Manual (6th edition). The "validator" is a seasoned audit professional holding the following credentials:

- Certified Internal Auditor (CIA),
- Certified Fraud Examiner (CFE),
- Certified Inspector General (CIG) and
- Certified Government Financial Manager (CGFM).

Scope, Objectives & Methodology

The primary objective of the quality assurance review was to evaluate ECSD Office of Internal Auditing (OIA) for compliance with auditing standards. Additional objectives included identifying commendable practices, as well as, areas where improvement may be needed to further enhance the audit function.

The work performed during the review included:

- Reviewing, verifying, and evaluating the self-assessment prepared by the OIA;
- Reviewing and evaluating questionnaires sent to current personnel;
- Interviewing OIA staff and other members of management;
- Reviewing and evaluating two audit projects; and
- Reviewing the OIA's policies and procedures, annual risk assessment, annual audit plan, audit charter, and other relevant documents.

Commendable Areas

The ECSD Office of Internal Auditing has a good grasp of auditing standards. Successful practices include the following:

- Maintaining a good reputation and credibility with senior management and audit clients.
- Reporting independently to the ECSD School Board.
- Interacting with an active, strong Audit Committee.
- Retaining qualified auditors who possess two or more professional certifications (CIA, CGAP, CRMA, CPA, CFE, etc.¹).
- Proactively seizing the opportunity to partner with management.

The recommendations are divided into two groups:

- Those that concern the **Escambia County School District as a whole** and suggest actions by Senior Management, the School Board or the Audit Committee.
- Those that relate to the **internal audit activity's** structure, staffing, deployment of resources, and similar matters that should be implemented within the IA activity, with support from senior management.

Recommendations are based on Institute of Internal Auditors *Standards,* Practices Advisories and best practices. Supporting Standards or practices are referenced where applicable.

Recommendation Structure

¹ The following certifications are awarded by the Institute of Internal Auditors: CIA=Certified Internal Auditor, CGAP= Certified Government Auditing Professional and CRMA =Certification in Risk Management Assurance. Other certifications held by the internal auditors are: CPA= Certified Public Accountant awarded by AICPA and CFE= Certified Fraud Examiner awarded by the Association of Certified Fraud Examiners.

Matter for Consideration by ECSD Board, Management and the Audit Committee

Fraud Reporting

IIA Standard 2110.A1 states:

"The internal audit activity must evaluate the design, implementation, and effectiveness of the organizations ethicsrelated objectives, programs and activities."

The current fraud/whistleblower process may not effectively achieve the objective of reducing the occurrence and/or detection of fraud. The current process provides personnel with a telephone number to the Human Resources Department. Generally, employees place greater trust in a solution available 24x7, managed by an independent third party, with two way communication capabilities and the ability to communicate anonymously.

{See Item 1 on page 12 for greater detail.}

Opportunities for Continuous Improvement - Office of Internal Auditing

PARTIAL CONFORMANCE TO THE STANDARDS

Risk Management (Standard 2120)

IIA Standard 2120 and Standard 2120.A2 states:

2120: "The internal audit activity must evaluate the effectiveness and contribute to the improvement of risk management processes."
2120.A2: "The internal audit activity must evaluate the potential for the occurrence of fraud and how the organization manages fraud risk.

The annual audit work plan should be based upon a risk analysis performed by OIA and updated annually. All organizations face a number of uncertainties and risks which can both negatively or positively affect the organization. Risk can be managed in a number of different ways, including acceptance, avoidance, transfer, or control. Ultimately, the key audit objectives are to provide management with the information to mitigate the negative consequences associated with not accomplishing the District's objectives, as well as, an assessment of the effectiveness of management's risk management activities.

The audit universe includes components from the District's strategic plan and reflects the District's objectives. Audit work schedules should be based upon, among other factors, an assessment of risk priority and exposure. Prioritizing is needed to make decisions for applying relative resources based on the significance of risk and exposure. Most risk models use risk factors to establish the priority of engagements such as: financial impact, asset liquidity, management competence, quality of internal controls, degree of change or stability, time of last audit engagement, complexity, employee and government relations, etc. Accordingly, the CAE has begun to work with the audit staff, the Audit Committee and District management to develop a risk assessment model that will have an enterprise wide focus. {See Item 2 on page 13 for greater detail.}

Matter for Consideration by ECSD Board, Management and the Audit Committee Opportunities for Continuous Improvement - Office of Internal Auditing

Planning (Standard 2010, Practice Advisory 2010-1)

IIA *Standard* 2010, Practice Advisory 2010-1 states:

"9. Factors the internal auditor considers when developing the internal audit plan include:

- Inherent risks—are they identified and assessed?
- Residual risks—are they identified and assessed?
- Mitigating controls, contingency plans, and monitoring activities—are they linked to the individual events and/or risks?
- *Risk Registers—are they systematic, completed, and accurate?*
- Documentation—are the risks and activities documented?

11. To ensure relevant risks are identified, the approach to risk identification is systematic and clearly documented. Documentation can range from the use of a spreadsheet in small organizations to vendor supplied software in more sophisticated organizations. The crucial element is that the risk management framework is documented in its entirety."

A risk-based audit plan should be developed and undertaken annually to ensure the OIA activities are aligned with ECSD. This can be achieved by first performing a risk assessment that seeks management's input in identifying risks affecting the District. Florida State School Board Education Rule 6A-1.087 requires school internal accounts to be audited annually. ECSD OIA has streamlined this audit process and has capacity to perform more risk-based audit engagements. {See Item 3 on page 14 for greater detail.}

Matter for Consideration by ECSD Board, Management and the Audit Committee

Coordination

IIA *Standard* 2050 requires coordination of internal and external audit work to ensure adequate audit coverage and minimize duplicative efforts.

When external auditors, other than financial auditors, visit ECSD, OIA should be notified to ensure OIA is aware of the engagement and to ensure there is no duplication of effort between the external auditors and OIA.

{See item 4 on Page 15 for greater detail.}

Opportunities for Continuous Improvement - Office of Internal Auditing

CONFORMANCE TO STANDARDS – OPERATING IMPROVEMENTS

{OIA conforms to the IIA Standards; the items presented below are suggested enhancements to the OIA operations.}



Internal Assessments (Standard 1311)

The audit function should utilize key performance indicators (KPI) to measure the achievement of goals and objectives. Additionally, KPI's should be reported to the Audit Committee periodically as a means to assess the effectiveness and efficiency of the function. {See item 5 on Page 16 for greater detail.}

Matter for Consideration by ECSD Board, Management and the Audit Committee **Opportunities for Continuous Improvement - Office of Internal Auditing**

Communication with the Audit Committee (Standard 1111)

The IIA has Standards, Practice Advisories, Practice Guides, and Position Papers, which undergo review and update, as well as, issuance of new items. A well-informed audit committee is one that may operate in a manner that enhances the OIA operations, as well as, understand, the internal auditing industry. Accordingly, the OIA Director should brief the Audit Committee periodically about changes within the internal auditing arena, new pronouncements, etc. so the Audit Committee may better understand the IA environment within which OIA must operate. {See item 6 on Page 17 for greater detail.}

			Superintendent Malcolm Thomas Chair of Board Jeff Bergosh	
Item Number	1	Responsible Party	Chair of Audit Committee Tod Wilson	

Item	Recommendation	Action Plan
 The current fraud/whistleblower process may not effectively achieve the objective of reducing the occurrence and/or detection of fraud. The current process provides personnel with an email address, telephone number and mailing address to Human Resources. Generally, employees place greater trust in a solution available 24x7 and managed by an independent third party. The Association of Certified Fraud Examiners (ACFE) periodically produces a "Report to the Nations on Occupational Fraud and Abuse". The 2012 report indicates that Fraud is most likely detected via tip. The average fraud duration is 18 months. The median loss is \$140,000. Providing individuals a means to report suspicious activity is critical. Reporting mechanisms should allow anonymity and confidentiality. Management should actively encourage employees to report suspicious activity. 	 It is recommended that the District: Develop a fraud reporting mechanism that is readily available to internal and external stakeholders. Ensure the fraud reporting mechanism allows anonymous and confidential reporting. Ensure the system allows two way communications. Periodically distribute employee communications about the hotline (i.e. purpose, availability, etc.). 	The Superintendent, School Board Chair, and Director of Internal Auditing have recently conducted research into fraud reporting services utilized by other Florida school districts. The Director summarized the research and issued his draft report to the Superintendent and School Board Members on March 11, 2013.

Item Number

2

Responsible Party David Bryant, OIA Director

Recommendation **Action Plan** Item OIA has not performed a systematic, formal risk Formalize the risk assessment and audit The OIA is currently developing a formal assessment of the District; however, plans are being made District-wide risk assessment process. planning process to include: to perform such an assessment. Risk assessment is a This process will include assessing (i) risk assessment activities, including process and is typically undertaken to focus attention on various forms of risks encountered by policies and procedures and the significant audit areas, to allocate scarce audit resources the numerous District functions, as well adequate identification of an audit to the most important audit areas, and to help with audit as, the internal controls in place to universe. prioritizing decisions such as audit frequency, intensity, address those risks. The process will development of audit plans which and timing. A systematic/formal approach to risk (ii) result in a ranking of functions that capture the risk identified in the risk assessment has the following benefits: represent the largest risk to the District assessment activities, and achieving its objectives. The District-The train of logic can be documented. ٠ proper resource allocation to achieve (iii) wide risk assessment process will be Review and consultation are facilitated. the completion of the audit plan. conducted in the Spring of 2013, and be Decisions may be easier to explain and justify. updated annually. A direct linkage can be provided between the Furthermore, formalize the decision process administrative structure and the characteristics of for the annual work plan and tie it to Risk In addition to assessing risk at the individual audit units. Assessment areas (e.g. factors that were District-wide level, OIA staff will evaluate considered during the CAE's evaluation, Consistency may be enhanced. • risk, and the potential for fraud, at the Qualitative methods may be more easily defended decision regarding topics, managers with individual engagement level by (e.g. Audit Committee, Board, District whom CAE interviewed/ discussed potential conducting pre-engagement assessments audit plan, etc.) As part of this process, management). of the area to be audited, and document interview others to let them 'be heard' (even the assessment results in the audit work though you may already know the high risks papers. The pre-engagement fraud and and issues). risk analysis work paper is currently under development, and will be utilized for audits beginning July 1, 2013.

Item Number

3

Responsible Party David Bryant, OIA Director

Recommendation **Action Plan** Item Annual audit plans are developed using informal input A risk-based audit plan should be developed The OIA is currently developing a formal from the District's management and the OIA Director's and undertaken annually to ensure the OIA District-wide risk assessment process. decisions. A risk-based audit plan: activities are aligned with ECSD. This can be The process will result in a ranking of achieved by first performing a risk assessment functions that represent the largest risk includes a list of key risk, which have been ٠ that seeks management's input in identifying to the District achieving its objectives. mapped to the Committee of Sponsoring Both annual and long term work plans risks affecting the District. Florida State School Organizations (COSO) Financial Controls Board Education Rule 6A-1.087 requires will be based on the results of the risk Framework Components that could be considered school internal accounts to be audited assessment. The District-wide risk for audit; annually. ECSD OIA has streamlined this audit assessment process will be conducted in demonstrates that areas considered to be of process and has capacity to perform more riskthe Spring of 2013. As such, the annual highest risk and significance are addressed by the based audit engagements. work plan for the 2013-2014 fiscal year internal audit plan; (and in future years) will be based on the provides assurance on important aspects of risk results of the risk assessment process. management, controls, and governance processes; focuses audit resources primarily on the provision of assurance services; and provides estimates of resources to meet the audit ٠ plan.

	Responsible	Malcolm Thomas, Superintendent and
Item Number 4	Parties	David Bryant, OIA Director

Item	Recommendation	Action Plan
IIA Performance Standard 2050 requires coordination of	When external auditors/evaluators, other than	As part of the District-wide risk
internal and external audit work to ensure adequate audit	financial auditors/evaluators, visit ECSD, OIA	assessment process, management will be
coverage and minimize duplicative efforts. OIA is aware	should be notified. This will ensure OIA is	asked about audits and reviews
of financial auditors visiting the District; however,	aware of the engagement and prevent	conducted by external auditors. The
program auditors and evaluators may work within the	duplication of effort between the external	Director of Internal Auditing will work
District and OIA is unaware. Coordination increases trust.	auditors/evaluators and OIA.	with the Superintendent to develop a
Because external auditors work for multiple clients, they		listing and/or calendar of outside
are exposed to a wider variety of issues. External auditors		audits/reviews. The goal will be to
may therefore discover and solve issues that internal		prevent duplication of effort, conduct
auditors have not dealt with before.		pre-audits, and assist management with
		audit preparation when requested. The
Coordination increases efficiency. When various areas		listing and/or calendar will be completed
undergo external evaluation and audit, this affects the		prior to the creation of the annual work
overall risk picture for OIA by decreasing the risk level		plan for the 2013-2014 fiscal year and
because another entity has evaluated the area.		will be updated on an annual basis.

Item Number

5

Responsible Party David Bryant, OIA Director

Recommendation **Action Plan** Item ECSD OIA has not fully developed standard key The audit function should utilize key The Director of Internal Auditing will performance indicators. Key performance indicators performance indicators (KPI) to measure the continue to develop key performance achievement of goals and objectives. (KPI's) serve as a method to periodically assess the OIA's indicators to assess the effective and Additionally, KPI's should be reported to the performance and provide stakeholders with reasonable efficiency of the internal auditing Audit Committee periodically as a means to function. While the function currently assurance that the office is effective and efficient in its assess the effectiveness and efficiency of the tracks staff certification and professional operations. function. Indicators may include: development hours, other project related Client survey results. ٠ Percentage of staff with certifications. indicators will be developed. The ٠ Director will research best practices in Professional development hours per staff ٠ client surveys, planning efficiencies, and member. reporting ratios and submit potential Utilization ratios. ٠ indicators to the Audit Committee. The Report turnaround time. desired indicators will be in effect for Audit plan completion. ٠ projects beginning in the 2013-2014 fiscal year.

Item Number

6

Responsible Party David Bryant, OIA Director

Recommendation **Action Plan** Item The IIA has Standards, Practice Advisories, Practice Accordingly, the OIA Director should brief the In an effort to ensure the Audit Guides, and Position Papers, which undergo review and Audit Committee periodically about changes Committee members are well-informed. update, as well as, issuance of new items. A well-informed within the internal auditing arena, new the Director of Internal Auditing will audit committee is one that may operate in a manner that pronouncements, etc. so the Audit Committee develop a calendar for presenting enhances the OIA operations as well as understand the may better understand the IA environment relevant information to the Audit internal auditing industry. within which OIA must operate. Committee, including changes in IIA *Standards*, recommended changes to the Audit Committee and Department Charters, and current industry trends. This information will be presented at Audit Committee meetings and incorporated into the meeting minutes. This process will begin with the April 2013 meeting, and will be ongoing.

Appendix I – Engagement Methodology

Review Procedures Included:

- Review of audit charter and other background/organizational materials regarding ECSD and the internal audit function.
- Review of the ECSD Board Policies, Audit Committee Charter, and OIA Charter.
- Review of QA advance preparation materials providing background on the IA function and practices.
- Review of the annual audit plan and risk assessment process.
- Review of selected internal audit project work papers and reports.
- Review of training histories for staff.
- Interviews with 20 ECSD individuals, customers, IA staff and ECSD officials.
- Interview with Director OIA.
- Review of audit follow-up practices and reporting of follow-up activities.
- Review of prior quality assessment.

Appendix II – List of Stakeholders Interviewed

Name	Title
Jeff Bergosh	Chairman, Escambia County School Board
Malcolm Thomas	Superintendent
Tod Wilson	Chair, Audit Committee
Earl Lee	Member, Audit Committee
Diane Martinez	Member, Audit Committee
Norm Ross	Deputy Superintendent
Donna Sessions Waters	General Counsel
Terry St. Cyr	Assistant Superintendent, Finance and Business Services
Shawn Dennis	Assistant Superintendent, Operations
Steve Marcanio	Assistant Superintendent, Curriculum and Instruction
Alan Scott	Assistant Superintendent, Human Resource Services
John Dombroskie	Director, Purchasing
Tom Ingram	Director, Information Technology
Gloria Johnson	Director, Accounting Operations
Linda Lewis	Director, Payroll
Laura Shaud	Director, Budgeting
Kevin Windham	Director, Risk Management
David Bryant	Director, Internal Auditing
Michele Kiker	Senior Internal Auditor
Justin Cook	Internal Auditor
Jennifer Chinchar	Audit Administration Specialist

Appendix III – The IIA Research Foundation – Internal Audit Capability Model Matrix

	Services and Role of IA	People Management	Professional Practices	Performance Management and Accountability	Organizational Relationships and Culture	Governance Structures
Level 5 – Optimizing	IA Recognized as Key Agent of Change	Leadership Involvement with Professional Bodies Workforce Projection	Continuous Improvement in Professional Practices Strategic IA Planning	Public Reporting of IA Effectiveness	Effective and Ongoing Relationships	Independence, Power, and Authority of the IA Activity
Level 4 – Managed	Overall Assurance on Governance, Risk Management, and Control	IA Contributes to Management Development IA Activity Supports Professional Bodies Workforce Planning	Audit Strategy Leverages Organization's Management of Risk	Integration of Qualitative and Quantitative Performance Measures	CAE Advises and Influences Top-level Management	Independent Oversight of the IA Activity CAE Reports to Top-level Authority
Level 3 – Integrated	Advisory Services Performance/Value-for- Money Audits	Team Building and Competency Professionally Qualified Staff Workforce Coordination	Quality Management Framework Risk-based Audit Plans	Performance Measures Cost Information IA Management Reports	Coordination with Other Review Groups Integral Component of Management Team	Management Oversight of the IA Activity Funding Mechanisms
Level 2 – Infrastructure	Compliance Auditing	Individual Professional Development Skilled People Identified and Recruited	Professional Practices and Processes Framework Audit Plan Based on Management/ Stakeholder Priorities	IA Operating Budget IA Business Plan	Managing within the IA Activity	Full Access to the Organization's Information, Assets, and People Reporting Relationship Established
Level 1 – Initial	Ad hoc and unstructured; isolated single audits or reviews of documents and transactions for accuracy and compliance; outputs dependent upon the skills of specific individuals holding the position; no specific professional practices established other than those provided by professional associations; funding approved by management, as needed; absence of infrastructure; auditors likely part of a larger organizational unit; no established capabilities; therefore, no specific key process areas					

Appendix IV - Biography of Reviewer

Betsy Bowers is Associate Vice President, Internal Auditing and Management Consulting at the University of West Florida and a Past President of the Association of College and University Auditors (ACUA). Ms. Bowers has been at UWF since 1993 and has served as the chief audit executive during the entire time. Previously, Betsy worked in Tennessee as the Internal Audit Director at Northeast State Technical Community College and Internal Auditor at East Tennessee State University, resulting in a total higher education work experience exceeding twenty-nine years. She has performed Quality Assurance Reviews at numerous universities (FSU, FGCU, Georgia Tech, Wichita State University, etc.) and this school District. Ms. Bowers is a Certified Internal Auditor (CIA), Certified Fraud Examiner (CFE), Certified Government Financial Manager (CGFM), Certified Inspector General (CIG), and earned her BA and MBA from East Tennessee State University. She serves on the Board for the Northwest Florida Institute of Internal Auditors, and as secretary for the Northwest Florida Association of Certified Fraud Examiners. Ms. Bowers taught a course in White Collar Crime as an adjunct professor in the Department of Justice Studies at UWF. Presently she serves as an instructor for the Institute of Internal Auditors on the topics "Tools and Techniques for Audit Managers" and "Tools and Techniques for Beginning Auditors."