



Auditdienst Rijk
Ministerie van Financiën

Riskbased Management Verifications

From an AA perspective

**The Audit Authority of the Netherlands
Auditdienst Rijk Ministry of Finance**

Independent, knowledgeable and committed

14-09-2023



Audits by AA on EU funds within NL





Martin de Witte and Carlo Louter





Roles and responsibilities

- The AA must safeguard its independence and avoid the risk of collusion
- As expert of risk-based audits, we can advise on risk models and on the pros and cons of choices about the approach
- **The MA is responsible for making the analyses and choices**





Roadmap to a risk-based approach and methodology

To define an approach/methodology



It starts with gathering knowledge

It (never) ends with a continuous process of risk evaluating and adjusting



Gathering knowledge

The 3B's model:

- Knowing the **B**usiness
 - Specific inherent risks of branches/lines of business in the program
 - Risks of conflicts with program goals
- Knowing the **B**udget
 - Materiality
 - High value-Low value
 - Procurement risks
- Knowing the **B**eneficiary
 - Specific inherent risks for types of beneficiaries within the projects



Choices to make (among others)



Percentage of financial coverage



Program expenditure level or project expenditure level



Integral/in full verification or partial observation of high-risk expenditures or entities/projects/partners



Partition in high value and low value strata



Coverage of projects/partners during a project period



The architecture of your approach/methodology

After

- Finishing the 3 B's of gathering knowledge
- Analyzing your risks
- Making up your choices

You will be able to define your approach or methodology

We can't offer you a standard recipe. The approach is program specific

We strongly advise you to construct your arguments on a solid basis and file the properly!



There will be findings!





Evaluation – Findings

- Evaluation depends on the nature of the finding
- Is it systematic or a stand-alone error?
- Besides the finding being systematic or stand alone, there could also be an indication that the initial risk assumptions is invalid



OR





Evaluation – Findings – Systematic or stand alone

- Evaluation depends on the nature of the finding
- Systematic error
 - An error that is also likely to be present in other non-selected observations
- Stand-alone error
 - An error that is atypical, hence that is not representative to other non-selected observations (requires a lot of determination and possibly additional auditwork to proof)



Evaluation – Findings – Risk assumptions

- Initially the MA made assumptions within the risk assessment
- Findings can give an indication that the assumptions made are not valid, which has to be considered
- If assumptions deem not to be valid, the risk should be raised and additional work must be performed (risk wide, hence the complete group that the risk is applicable to)





Evaluation – Findings – Example

- The MA has a lot of hospitals that are being funded with ERDF for various research projects
- Based on historical experience the MA knows that internal systems regarding the registration of worked hours is very well established in these organisations through software that is used sector wide
- The MA therefore assigns a low risk on the Q component of worked hours for hospitals
- As a consequence, less observations are audited on the Q component of worked hours



Evaluation – Findings – Example

- During the audit, an error has been found in the Q component of worked hours
- First question: What is the nature of the error?
- Imagine that the error occurred because the hospital in particular found a workaround in the system regarding the segregation of duties → which seems a systematic error
- This means, systematic for the hospital in particular. The finding itself does not portray evidence for it being applicable to other hospitals
- Hence, the risk assumptions made by the MA are still valid for other hospitals



Evaluation – Findings – Example

- Same situation, but with the knowledge that the systematic error derived from an error in the software that is used by hospitals in general
- While analysing the error, it has been found that the software has serious shortcomings
- Additional to the systematic error that also plays a role here, the assumptions of the MA to assign a low risk on the Q component of worked hours for hospitals is questionable



Evaluation – Findings – Example

- Because of the nature of these assumptions, there is an iterative learning process
- In the situation of the hospital, the MA had the assumption that the sector wide software was reliable, therefore a low risk was applied
- During the audit, it is shown that the assumption of the MA wasn't suitable
- As a consequence, the MA selected too little observations regarding the Q component of worked hours in hospitals



Evaluation – Findings – Example

- Therefore, the MA should change its assumptions for coming periods (and apply a higher risk)
- Given the assumption was wrong, the MA should restore its error by selecting additional observations, as were the assumption not there in the initial selection



Evaluation – Final remarks of the example

- In the given example, the risk of the Q component of worked hours for hospitals was determined to be low
- Specification of risks should be given on a very detailed level and not only on a project, partner or cost type of level
- For example, the P component in the example could have a very high risk
- If in that case, the matter were to be determined on the level of cost type, the risk would probably even out to a medium risk level → which, in essence differs from a high-risk P component and a low-risk Q component



Conclusion

The risk-based approach/methodology is not static but a continuously evolving process

