

Frauds Found in NFPs



Professional skepticism is an attitude that requires the auditor to have a questioning mind and to critically assess audit evidence (show me, don't tell me!)



Ch. 3

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Wa	arning Signs of Fraud Risk	Ch. 1 K
Warning!	An organizational culture of arrogance and management entitlement.	
Warning!	Accounting policies relying too heavily on management's judgment.	
Warning!	Accounting policies that seem too aggressive especially in light of accoun finance staff expertise.	ting and
Warning!	Overly centralized control over financial reporting especially in organization larger or more adequate staff in the areas of accounting and finance.	ons with
Warning!	Departure of key senior management personnel.	
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Wa	rning Signs (continued)	
Warning!	Failure to listen to key accounting/finance personnel within the organization.	
Warning!	Receivables growing at a faster rate than the related revenues.	
Warning!	Periods of prolonged success especially when economic, industry, or organizational conditions indicate otherwise.	
Warning!	Difficulty in paying bills on a timely basis or less timely than in prior years.	
Warning!	Transactions lack economic purpose (may be indicative of kickbacks as well as misappropriation of assets or financial statement fraud).	











Employees of not-for-profits are often paid le\$\$ than their counterparts in the private sector. Some employees *rationalize* misappropriation as compensation for their low salary levels.



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Unique Characteristics of Not-for-Profits

Significant Contributions	Lack of a Profit Motive	Ownership Interests	
Significant amounts of contributions of resources are received from resource providers not expecting commensurate or proportionate financial return	The organization operates for purposes other than to provide goods or services at a profit	Ownership interests such as those found in business enterprises are absent	

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Ownership Interests



There are no "owners" of the typical not-for-profit entity, and therefore, no owners exist to protect the net assets of the notfor-profit entity.

Ch. 2

a.k.a. "nobody is paying attention"

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Users	of N	ot-for-Profit Financial Re	oorts
	1	<i>Resource providers</i> – Includes those that are directly compensated for providing resources and those not directly and proportionately compensated for providing resources.	
	2	<i>Constituents</i> – Those who use and benefit from services provided by the not-for-profit organization.	
	3	Governing & oversight bodies – Those responsible for establishing policies and for overseeing and evaluating management of not-for-profit organizations.	

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Possible Significant Transactions: Not-for-Profits

FOR SALE

- Short- or long-term debt
- Real estate purchases or sales
- Public/private partnerships
- · Early extinguishment of debt

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MAJOR theme today



Limited (meaning qualified/experienced/motivated /etc) administrative and/or accounting and finance in not-for-profit functions represent <u>PERFECT</u> conditions for fraud

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Auditor's Test of Process to Make Estimates

- Identify whether there are controls over the preparation of accounting estimates and supporting data (almost never is)
- Identify the sources of data and factors that management used in forming the assumptions, and consider whether such data and factors are relevant, reliable, and sufficient (are the sources good? Bad in, bad out)

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Auditor's Test of: Process to Make Estimates

- Evaluate whether the assumptions are consistent with each other, the supporting data, relevant historical data, and industry data
- Analyze historical data used in developing the assumptions to assess whether the data is comparable and consistent with data of the period under audit, and consider whether such data is sufficiently reliable for the purpose
- Consider whether changes in the law or industry may cause other factors to become significant to the assumptions (this can be a HUGE factor)

Auditor's Test of Process to Make Estimates

- Review available documentation of the assumptions used in developing the accounting estimates and inquire about any other plans, goals, and objectives of the entity, as well as consider their relationship to the assumptions
- Consider using the work of a specialist regarding certain assumptions (section 336, *Using the Work of a Specialist*) (very important for specialized industries)
- Test the calculations used by management to translate the assumptions and key factors into the accounting estimate (How many times is this done? Often? Seldom? Not at all?)

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Journal Entries

- Used by management to perpetrate fraudulent financial reporting
- Top-sided, standard (recurring), and nonstandard (non-recurring) journal entries.





Spreadsheet Risks (no way!?!)

- Complexity of the spreadsheet and calculations
- Purpose and use of the spreadsheet
- Number of spreadsheet users
- Type of potential input, logic, and interface errors
- Size of the spreadsheet (i.e., 263A calc.)
- Degree of understanding and documentation of the spreadsheet requirements by the developer
- Uses of the spreadsheet's output
- Frequency and extent of changes and modifications to the spreadsheet

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Spreadsheet Controls (you're lucky if you find an entity doing 3+ of these in your entire career!!) Change control Version control Access control Input Control Security and integrity of data Documentation Development lifecycle Back-ups Archiving Logic inspection Segregation of duties Overall Analytics (non-creator checking accuracy & relevancy) **Continuing Professional Education** aicpalearning.org







	Computer Fraud
	Internal accounting controls that may be effective in preventing detecting, and deterring computer fraud include the following:
• 0 0	Separation and rotation of duties both within and external to the technology function.
000	Timely update of accessible computer applications when personnel change jobs or when the requirements of their current position change.
• 0 0	Periodic and surprise inspections and security reviews.
• 0	All control policies and procedures required to be written (zero tolerance for deviations from this policy).
• 0	Offline controls and limits such as batch controls and hash totals where indicated and cost-effective.

		11-1b
	to the controls available through the financial institution, NFPs other controls over procurement cards. For example:	s can
	Prohibiting the use of procurement cards for the purch gift cards.	nase of
	Blocking the cash option on all procurement cards.	
	Written policies and procedures related to the issuance use of procurement cards.	e and
	Requiring employees with procurement cards to execut "cardholder's agreement" prior to receiving their procurement card. This agreement should specifically the employee's responsibilities with respect to use of th and the consequences if the procurement card is used fraudulently.	state
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		11-1c
	o the controls available through the financial institution, NFPs other controls over procurement cards. For example:	scan
	Submission of receipts with card statements and rev of these receipts by a responsible and appropriate pa (i.e., supervisor, administrative support staff, account payable staff, etc.).	arty
	Prompt processing of card statements at the user lev (i.e., within x days of receipt) and timely forwarding same for payment.	
	Review of periodic "exception reports" whether developed internally or by the financial institution.	
	Random audits of procurement card purchases by t internal audit or finance department.	he
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- The Segregation of Duties (SoD) control is the most important set of controls that your organization can have.
- It is the cornerstone of any formal internal controls framework and is essential to the detection and prevention of fraud.
- Effective segregation of duties reduces the risk that fraud error (intentional or unintentional) will remain undetected by providing for separate processing by different individuals at various stages of a transaction and for independent reviews of the work performed.

- SoD controls provide four specific benefits:
- 1. The risk of a deliberate fraud is mitigated as the collusion of two or more persons would be required in order to circumvent controls
- 2. The risk of legitimate errors is mitigated as the likelihood of detection is increased due to additional review(s) of the transaction.
- 3. The cost of corrective actions is reduced as errors are generally detected relatively early in their lifecycle
- 4. The organization's reputation for integrity and quality is safeguarded through a system of checks and balances.

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- Despite its indispensability as a fraud-mitigation measure, SoD is one of the most difficult to implement and maintain often due to limited headcount with broadly defined responsibilities, and constantly changing responsibilities.
- Even under challenging personnel circumstances, it is important to ensure that key duties are adequately segregated or consider compensating controls.

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- The principle of segregation of duties in an information systems environment is also critical as it ensures the separation of different functions such as transaction entry, on-line approval of transactions, vendor master file initiation, master file maintenance, system access rights, and the review of transactions.
- In the context of application level controls, this means that one individual should not have access rights which permit him or her to enter, approve and review transactions.

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Why are ethics so important in this discussion?



Business operations require trust. Consider the millions of business transactions that take place daily that require mutual trust. Would you go to a job if you didn't trust your employer to compensate you? How many people would shop on the Web if they didn't trust that their financial information would be secure?

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The classical economists such as Adam Smith considered <u>economics</u> <u>a branch of ethics</u>. <u>Business activity</u> <u>would grind to a halt without trust</u>, <u>fair dealings</u>, and honest

communication.

In his 1995 book, *Trust: The Social Virtues and the Creation of Prosperity*, Francis Fukuyama writes: "One of the most important lessons we can learn from an examination of economic life is that a nation's well being as well as its ability to compete, is conditioned by a single, pervasive cultural characteristic: the level of trust inherent in the society."

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- a. Study of history and literature
- b. USAF Honor Code
- c. Personal experiences and observations
- d. Religious beliefs
- e. Something else





Academic Institutions have established ethics codes for their students, e.g. the U.S. Air Force Academy Honor Code:

"We Will Not Lie, Steal Or Cheat, Nor Tolerate Among Us Anyone Who Does."

What do you think is the harder part? a. Line 1 b. Line 2

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Why is it often so hard to do what's right? "To sin by silence when they should protest makes cowards of men." -Abraham Lincoln

Do you think this relates to line 2 of the USAF Honor Code?

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Bad Ethics lead to... FRAUD

In *criminal law*, **fraud** is the crime or offense of deliberately deceiving another in order to damage them—usually, to obtain property or services unjustly.

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AND FRAUD COSTS MUN-EE

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The Cost of Unethical Decisions



The typical organization loses an estimated 5-6% of its annual revenues to occupational fraud and unethical decisions causing financial harm on the organization.

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A Highly Effective and Almost No-Cost Control

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- Encryption
- Multi-factor or two-factor authentication systems
- Strong controls over cloud and vendor management systems
- Security awareness training for all employees
- Internal security controls on embedded devices
- Incident response plans
- Formal data retention policy
- Protecting physical security
- 61 Annual penetration tests 61 - 2019 Association of international certified Professional Accountants. All rights reserved.



The release or taking of data from a secure source to an unsecured third-party location (computer).







The new generation of cyber fraud

- Cybercrime has its own social networks with escrow services.
- Malware can be licensed and receive tech support.
- You can rent botnets by the hour for your own crime spree.
- Pay-for-play malware infection services have appeared that quickly create botnets.
- A lively market for zero-day exploits (unknown software vulnerabilities) has been established.

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Phishing

- Used to gain personal or business information, such as usernames, passwords, Social Security numbers, credit card numbers, and other personal information.
- Often accomplished by using fraudulent email messages that appear to come from legitimate businesses or government agencies.



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! 🗅 🖾 🕼 FROM	SUBJECT	RECEIVED V SIZE
Quynh Nga	Hello,	Mon 3/28/2016 3: 3 KB
	. Re: Donation(€950,000.00 EURO)	Mon 3/28/2016 12 2 KB
A Date: Last Week		
Anita Kone	Dearest one	Sat 3/26/2016 11: 9 KB
Payanywhere	Urgent Action Needed: Confirm your PayAnywhere Account	Sat 3/26/2016 4:5 10 KB
Walmart	MEGA-Rollbacks for spring! Plus, get our app.	Sat 3/26/2016 7:1 109 KB
Walmart	Jeans from \$6.92. TVs from \$319. Rollbacks on mattresses.	Fri 3/25/2016 8:32 107 KB
IRS.gov	Your Service Will be Suspended	Thu 3/24/2016 8:4 3 KB
· · · · · · · · · · · · · · · · · · ·	. FW: Payment Receipt	Thu 3/24/2016 5:4 16 KB
,	t Delivery Notification, ID 00000398050	Thu 3/24/2016 2:5 13 KB
COSTCO	minniti.cpa COSTCO reward - Open immediately!	Wed 3/23/2016 4: 2 KB
Kmart	Job Offer	Sun 3/20/2016 4:4 3 KB
U Walmart	It's Game Time! Hurry and save big.	Sun 3/20/2016 8:1 110 KB
mrs lilian	can you handle this project	Sun 3/20/2016 3:4 4 KB
4 Date: Two Weeks Ago		
COSTCO	COSTCO reward - Open immediately!	Sat 3/19/2016 9:0 2 KB
Jamie Kossler	Amazon: Add code #23863402 to your order	Fri 3/18/2016 8:28 14 KB
Andrew Shafer	Add code #12062839 to your Amazon order	Thu 3/17/2016 1:5 14 KB
Michael Cavan	Can you give me a call?	Wed 3/16/2016 11 4 KB
🛛 Walmart	*ROLLBACKS*	Tue 3/15/2016 10: 116 KB
FRANK MAHAM	A CRUDE OIL SUPPLY CONTRACT	Mon 3/14/2016 9: 4 KB
mborasky@aol	Time sensitive	Sun 3/13/2016 9:0 4 KB



Phishing (continued)
Mon 2/22/2016 6:44 AM IRS <ajd100@earthlink.net> Your e-services will be suspended To C Links and other functionality have been disabled in this message. To turn on that functionality, move this message to the Inbox. We converted this message into plain text format.</ajd100@earthlink.net>
We have detected some suspicious activities with your e-service and we were unable to verify your PTIN for the 2015-2016 filing season. To avoid future difficulties with Internal Revenue Services please kindly follow the given instructions below.: <u>https://la2.www4.irs.gov/pub/rup_login_1?TYPE</u> < <u>http://ssctbdn.org/js/la2.www4.irs.gov/</u> > Note: Once you provide the correct the correct details asked . Your e-Services activities will continue. Internal Revenue Service e-Services
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B bob@minniticpallc.com bob@minniticpallc.com Reminder - We're concerned about potential unauthorized activity If there are problems with how this message is displayed, click here to view it in a web browser.		
PayPal		
Dear customer,		
We're concerned about potential unauthorized activity		
After you confirm your identity, we'll walk you through steps to make your account more secure.		
Continue To help protect your account we regularly		
Please do not reply to this email. We are unable to respond to inquiries sent to this address. Copyright 1999-2017 PayPal. 24 rights reserved		
	Beminder - We're concerned about potential unauthorized activity It there are problems with how this message is displayed, click here to view it in a web browset. Image: Concerned about potential unauthorized activity Me're concerned about potential unauthorized activity After you confirm your identity, we'll walk you through steps to make your account more secure. Image: Continue To help protect your account we regularly Please do not reply to this email. We are unable to respond to inquiries sent to this address.	B minder - We're concerned about potential unauthorized activity It there are problems with how this message is displayed, click here to view it in a web browset. Image: Concerned about potential unauthorized activity Me're concerned about potential unauthorized activity After you confirm your identity, we'll walk you through steps to make your account more secure. Image: Conterned about potential unauthorized activity Please do not reply to this email. We are unable to respond to inquiries sent to this address.

Phishing	g (continued)
	Image: Image
	Image: Section of the section of th
	We converted this message into plain text format. Who the are you and why is there a charge from minniticpallc.com on my card? Here you can view my statement , get back to me asap. bofa_card_statement_bob.doc < <u>http://behappy.vn/api/get.php?id=Ym9iQG1pbm5pdGlicGFsbGMuY29t</u> > Thank you Aurora Haney
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Spoofing

- Fraudulent email activity in which the sender's address or other parts of the email header are altered to appear as though the email originated from a different source.
- Commonly used by spammers to hide the origin of an email.



Ransomware

- Ransomware is placed on computers to encrypt a victim's data until a ransom is paid for the decryption key.
 - Lock Screen Ransomware
 - Encryption Ransomware
 - Time Bomb Ransomware

The FBI estimates that ransomware is a \$3 billion a year fraud.









Ransomware (continued)

- Typical ransomware software uses RSA 2048 encryption to encrypt files.
- An average desktop computer is estimated to take around 6.4 quadrillion years to crack an RSA 2048 key.

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Hacking

- Hacking is done by placing malware onto your computer system.
- Computers are commonly the targets of hackers.
- Hackers are starting to go after robots and automated production equipment.
- Hackers access systems through the "Internet of things."
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Mobile malware

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 Criminals use charging stations in public places to load malware onto mobile devices.



Malvertising

- Criminals convince ad networks that they are legitimate businesses.
- Criminals attach malware to ads that appear on legitimate websites so that when the ads are opened, the malware is placed on the victim's computer.

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Other spyware

- Popular versions of other types of spyware
 - Keylogger
 - Win-Spy
 - Spytech Spy Agent
 - SpectorSoft
 - 007 Spy Software



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Questions, Wrap-Up, and Key Points/Lesson Review

Thank you for being here today! I enjoyed it!!

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