



JASON E. MUMPOWER  
Comptroller

August 26, 2024

Government Accountability Office  
441 G Street NW  
Washington, DC 20548

RE: Comments on *Standards for Internal Control in the Federal Government* (Green Book), 2024 Exposure Draft

The Department of Audit of the Tennessee Comptroller of the Treasury appreciates the opportunity to provide comments on the Government Accountability Office's proposed standards. Our comments on the revisions, are included below.

We have some concerns about the change in the definition of control activities. In the current Green Book, control activities are defined as actions taken to both ensure the organization achieves its objectives and to respond to controls risks, and in the proposed guidance, control activities are defined as actions taken to mitigate risks to the entity achieving its objectives. Although this revised definition aligns with the COSO definition, we are concerned the definition may be problematic in the context of Yellow Book performance audits. As noted in *Government Auditing Standards*, paragraph **1.22 b**, "internal control comprises the plans, methods, policies, and procedures used to fulfill the mission, strategic plan, goals, and objectives of the entity." In the enumeration of potential internal control audit objectives found in **1.24**, a system of internal control would ensure the achievement of "organizational missions, goals, and objectives." Paragraph **8.38c** defines internal control as

a process effected by an entity's oversight body, management, and other personnel that provides reasonable assurance that the objectives of an entity will be achieved. Internal control comprises the plans, methods, policies, and procedures used to fulfill the mission, strategic plan, goals, and objectives of the entity.

If you have questions or need clarification on any of our comments, please contact David Cook at [REDACTED] or John Troyer at [REDACTED].

Sincerely,



Kathy Stickel, CPA, CGFM  
Director, Division of State Audit



Jim Arnette, CISA, CGFM  
Director, Division of Local  
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