From: Conlon, Michael (OBO-FSICO) ████████████
Sent: Thursday, August 8, 2024 9:52 AM
To: Green Book Comments
Subject: Recommended Edit for OV4.04 and 10.04

Good afternoon,

Please see below recommended edits in red. We are noticing in large agencies that complementary user entity controls are not consistently being performed for nationwide decentralized controls without a centralized group to ensure they are completed.

OV4.04 If controls the service organization performs are necessary for the entity to achieve its control objectives related to the assigned business process, the entity's internal controls may include complementary user entity controls and other controls, as appropriate, related to the use of the service organization. Complementary user entity controls are those that service organization management identifies as necessary for the entity to implement in addition to controls the service organization performs to achieve its control objectives. Other controls may include those related to monitoring the effectiveness of the design, implementation, and operation of the service organization's controls in achieving the entity's control objectives. *The program manager is responsible to ensure that complementary user entity controls and other controls, as appropriate, are completed.*

10.04 Oversight of service organizations
Program management establishes control activities to oversee service organizations that perform business processes on behalf of the entity. The entity may also establish complementary user entity controls that service organization management identified as being necessary for the entity to achieve its objectives. *The program manager is responsible to ensure that complementary user entity controls and other controls, as appropriate, are completed. Program* management establishes processes for communicating necessary information to service organizations, such as relevant risks, internal control practices to consider, and other circumstances that may impact achieving the entity's objectives.

Thank you for your consideration.

Michael Conlon
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