



POLICY TITLE: Distribution of Audit Reports

Responsible Department: Audit and Compliance

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SUMMARY & PURPOSE:

This policy serves to guide the Corporate Vice President and Chief Compliance Officer on the dissemination of audit results to the appropriate individuals, within and outside of the organization.

POLICY:

It is our policy to control the distribution of draft and final reports. Final reports will be distributed to those members of management who are able to ensure that engagement results are given due consideration. A summary communication will be provided to those in an oversight role. Reports that are confidential, privileged or related to improper or illegal acts will be restricted to a tightly controlled group.

SCOPE/APPLICABILITY:

Individuals within the Audit and Compliance Department.

PROCEDURES TO ENSURE COMPLIANCE:

1. Standard Audit Reports:
 - a. A draft of the report may be reviewed with any of the following individuals prior to, or during, the exit interview process:
 - i. The manager(s), or higher level individual, of the department(s) under audit.
 - ii. The manager(s), or higher level individual, of any other department necessary to ensure the appropriate actions are taken.This copy, whether electronic or paper, will be clearly marked "draft".
 - b. Any relevant responses obtained during the course of the exit interview process will be included in the final report.
 - i. The final report will be signed by the Corporate Vice President and Chief Compliance Officer.
 - c. The final report will be addressed to the director(s) or vice president(s) of the department(s) under audit and may be distributed to any of the following individuals:

All references to Policies must go to the BHSF Master Copy on the BHSF Intranet; do not rely on other versions / copies of the Policy.

- i. The Chief Executive Officer, SMH.
 - ii. The manager(s) of the department(s) under audit.
 - iii. The manager(s), director(s) or vice president(s) of any other department necessary to ensure corrective action is taken.
 - d. Where appropriate, a summary communication will be provided to higher-level individuals within the organization. A full copy of the final report is available upon request.
 - e. The Audit and Compliance Committee will be provided a summary of audit results on a periodic basis. In the event that significant risk exposures and control issues, including fraud risks, governance issues, regulatory non-compliance or other matters are identified during the course of audit activities, these significant engagement observations and associated recommendations will be highlighted to the Audit & Compliance Committee. A full copy of the final report is available upon request.
2. Confidential, Privileged or Otherwise Sensitive Audit Reports:
These reports will be restricted to a tightly controlled group.
 - a. A draft of the report may be reviewed with any of the following individuals prior to, or during, the exit interview process:
 - i. The manager(s), or higher level individual, of the department(s) under audit.
 - ii. The manager(s), or higher level individual, of any other department necessary to ensure the appropriate actions are taken.

This copy, whether electronic or paper, will be clearly marked “draft” and “do not distribute or copy”.
 - b. Any relevant responses obtained during the course of the exit interview process will be included in the final report.
 - i. The final report will be signed by the Corporate Vice President and Chief Compliance Officer.
 - c. The final report will include a cover letter explaining that the report may not be copied or distributed to any but the following individuals without the consent of the Corporate Vice President and Chief Compliance Officer:
 - i. The Chief Executive Officer, SMH.
 - ii. The director(s) or vice president(s) of any other department necessary to ensure corrective action is taken.
 - iii. Office of the General Counsel.
 - iv. Outside counsel.
 - d. Where appropriate, a summary communication will be provided to higher-level individuals within the organization. A full copy of the final report is available upon request.
 - e. The Audit and Compliance Committee will be provided a summary of audit results on a periodic basis. In the event that significant risk exposures and control issues, including fraud risks, governance issues, regulatory non-compliance or other matters are identified during the course of audit activities, these significant engagement observations and associated recommendations will be highlighted to the Audit & Compliance Committee. A full copy of the final report is available upon request.

If subsequent to a final report being distributed, a significant error or omission is discovered, the Corporate Vice President and Chief Compliance Officer will communicate the corrected information. This communication could take a variety of forms from a memorandum denoting the error or omission, to the re-issuance of the final audit report. In the case of confidential, privileged reports, the Corporate Vice President and Chief Compliance Officer may take actions to collect all distributed reports prior to the issuance of an amended report.

SUPPORTING/REFERENCE DOCUMENTATION:

International Standards for the Professional Practice of Internal Auditing (Standards)
Office of the Inspector General, Compliance Program Guidance

RELATED POLICIES, PROCEDURES, AND ASSOCIATED FORMS:

- BHSF Administrative Policy: 801 Departmental Responsibilities and Charter Policy – Audit and Compliance
- BHSF Administrative Policy: 806 Distribution of Audit Reports

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- BHSF Departmental Policy: 74730-809 Preparation of Reports and Associated Workpapers Policy – Audit and Compliance

ENFORCEMENT & SANCTIONS:

Enforcement of this policy will be performed by Baptist Health South Florida's Audit and Compliance Department. Failure to comply with or report a violation of a compliance program policy can lead to disciplinary action up to and including termination.