

FIP Preparation, Submission Instructions, and Template

FIP Preparation Instructions

The OUSD(C), in collaboration with the reporting entities, developed a standard framework/template for reporting entity financial improvement plans (FIPs). It is mandatory that the reporting entities use the standard FIP framework [WBS levels 1, 2, & 3], regardless of their audit ready status (e.g. 'under audit', 'preparing for audit', etc). The FIPs are living documents and must be maintained and updated as reporting entities progress through the phases/tasks/activities of the FIAR Methodology. Once a reporting entity has achieved audit readiness and it is under audit, the reporting entity is only expected to complete the tasks shown in gray in FIAR Guidance Figures 2 and 12 on a continuous basis.

The standard FIP template provides required data fields that align to the FIAR Methodology. This document provides general guidance for the framework. It also provides definitions/explanations of required data field definitions for each Discovery Phase action task, as well as other sections of the standard framework for reporting entity FIPs.

General Guidance

1. FIP Framework/Template Section Descriptions:

Key Control Objectives (KCOs) and Key Supporting Documents (KSDs). This section is designed to identify standardized outcome-oriented control objectives that were derived from the GAO Financial Audit Manual (FAM). This section also identifies the minimum KSDs applicable to each assessable unit. These objectives are the key items that are required to achieve accurate financial reporting and auditability. Standard sets of KCOs and KSDs exist for each assessable unit and are included within Appendix C of the Guidance. These standard KCOs and KSDs are also being used as support for the FIAR Milestones. Reporting entities may add additional items to this section that will not be identified as support for FIAR Milestones. All KCOs and KSDs [identified as having a KCO status of deficiency or material weakness] should be supported by corrective actions designed to achieve the objectives.

Discovery Phase. This section is designed to identify essential discovery tasks and provide a means to monitor progress.

Corrective Actions Phase. This section identifies the corrective actions designed to achieve the KCOs and KSDs and other objectives described in the previous section. This section also provides the status of the actions by the percent complete. The corrective action plans included here also serve as the basis for the Component's Summary Corrective Action Plan required to be submitted in support of the annual Internal Control Over Financial Reporting (ICOFR) Statement of Assurance (SOA).

Evaluation Phase. This section identifies the testing activities to be performed to validate that corrective actions have resulted in effective KCOs, and effective KSDs for the assessable unit. If results of update testing indicate that corrective actions

did not result in effective KCOs and KSDs, entities will be required to return to the Corrective Action phase to design and implement new corrective actions to remediate identified deficiencies.

Assertion Phase. This section identifies the tasks and status of management's efforts to assert audit readiness.

Validation Phase. This section identifies the tasks that management will perform to validate the audit readiness of an assessable unit after audit readiness has been asserted.

Audit Phase. This section identifies tasks that management will perform to engage and support an audit.

2. The KCOs and KSDs section must include the OUSD(C)/FIAR standard KCOs and KSDs from the applicable sections of the FIAR Guidance. Reporting entities may add additional improvement objectives, if desired. The additional objectives might either be related to existing KCOs/KSDs or added at the end of the KCOs/KSDs section. An example of an additional item is an auditor-identified weakness, or a previously reported weakness for ICOFR. This weakness will likely be related to one of the standard enterprise KCOs and should be added as an additional objective. If it is not related to a standard KCO, then it should be added at the end of the KCO list. The corrective action tasks designed to remediate the weakness will be listed in the Corrective Action section and will be listed as predecessors (using the predecessor field) for predecessors to the weakness listed in the KCOs section. [Predecessors may be defined as finish-to-start or finish-to-finish]
3. Corrective Actions and Testing tasks that are associated with systems must identify the system.
4. Tasks that describe audit work on a system should identify the type of audit and the organization that is performing the audit (e.g., FISCAM by the DoD OIG).
5. Testing tasks to be performed at the conclusion of an assessable unit's corrective actions should identify the organization responsible for performing the task (e.g., Service Audit Agency).

FIP Field Definitions

Start Date. For tasks that have not started, this **required** field is an estimated date when the task will begin. For tasks that have already started, this will be the date that work began. This is the current start date. For the KCO/KSD section, this is the earliest start date for the tasks that support the KCO/KSD.

Finish Date. For tasks that have not finished, this **required** field is an estimated date when the task will be completed. This is the current finish date. For tasks that have already been finished, this is the date that work was completed (percent completed should be shown as 100%). For the KCO/KSD section, this is the estimated completion date for the tasks that support the achievement of the KCO/KSD.

Baseline Start. This **required** field is the start date for a task as of the publication of the most recent FIAR Plan Status Report and is the date the task was estimated to start. This is the original start date. For the KCO/KSD section, this is the earliest start date for the tasks that support the achievement of the KCO/KSD. Baseline dates may only be re-baselined with the coordinated approval of the reporting entity Financial Management/Comptroller or Agency Comptroller, or their designated senior representative, and the FIAR Director.

Baseline Finish. This **required** field is the finish date for a task as of the publication of the most recent FIAR Plan Status Report and is the date the task was estimated to be completed. This is the original finish date. For the KCO/KSD section, this is the latest completion date for the tasks that support achieving the KCO/KSD. Baseline dates may only be re-baselined with the coordinated approval of the reporting entity Financial Management/Comptroller or Agency Comptroller, or their designated senior representative, and the FIAR Director.

Percent Complete. This **required** field is an estimate of the percentage of completion of a task. The percentage should be based on an estimation of the total labor or effort required to complete a task and the total labor or effort completed, and should be updated on a regular basis, but no less than quarterly.

Predecessor. This field is used to identify instances when a task cannot be completed until a different task is completed first. Many tasks may be contingent upon the completion of other tasks; therefore, this field should be used to identify/link a specific task to the task upon which it is dependent. The field should contain the task identification numbers from Microsoft Project.

Key Control Objective (KCO) Weakness. This field is only applicable to the Corrective Action sections of the plan and is used to directly link Corrective Action tasks to the KCOs they relate to or impact. This field will accept single or multiple entries and will consist of the task number of the applicable KCO/KSD(s) delimited by commas, as required.

Control Objective Test Status (formerly Control Objective Status). This **required** field is only applicable to the KCO/KSD section and is used to identify the status of the KCO/KSD requirement. [Acceptable Values: Unassessed, Weakness, or Effective].

Primary Financial Statement Assertion. This **required** field is only applicable to the KCOs/KSDs section and is used to identify the primary financial statement assertion supported by each KCOs/KSDs. [Acceptable Values: Existence or Occurrence, Completeness, Rights and Obligations, Valuation or Allocation, Presentation and Disclosure. Only one value may be entered.]

Secondary Financial Statement Assertion. This **required** field is only applicable to the KCO/KSD section and is used to identify the additional Financial Statement Assertions supported by each KCO/KSD. [Acceptable Values: Existence or Occurrence, Completeness, Rights and Obligations, Valuation or Allocation, Presentation and Disclosure. More than one value may be entered.]

FIAR Milestone. This field is used to identify tasks that will be reported in the FIAR Plan Status Report. The intent is to identify the significant tasks that will result in the incremental achievement of objectives. This is important because the intent of the FIP is to address not only the KCOs/KSDs needed for auditability, but also the objectives and plans for other related

purposes, such as those associated with compliance audits and management initiatives.[As seen in **Figure 1**, Acceptable Values are Y/Blank]

Task Section	FIAR Milestone
Section 0 – Standard KCOs/KSDs	Y
Section 0 – Reporting entity-added KCOs/KSDs	
Section 1 –Discovery	
Section 2 – Corrective Action Tasks	Yes, if major activity or published in past or future FIAR Plan Status Report; No, if a subtask
Section 3 – Evaluation	Yes, if major activity or published in past/future FIAR Plan Status Report; No, if a subtask
Section 4 – Management Assertion	Y
Section 5 – Validation	
Section 6 – Audit	Y

Figure 1. Task Sections and FIAR Milestone

Responsible Person. This field is only applicable to the KCOs / KSDs section and is used to identify the individual responsible for the effectiveness of the key control or supporting documentation. This field should include the last name, first name, and the person’s commercial telephone number with area code (e.g., Smith, John, 202-555-1212). The person identified should be a management official responsible for ensuring that the control objective is effective and should not be at the action officer level. Example:

- Army- Director, Audit Readiness, Directorate Office of the Assistant Secretary of the Army (OASA) Financial Management and Comptroller (FM&C),
- Navy-Program Manager, Department of the Navy, or
- Air Force- Associate Deputy Assistant Secretary for Financial Operations, Office of the Assistant Secretary for Financial Management and Comptroller, Headquarters.

Financial Improvement Element (FIE). This field is only applicable to tasks contained in the Corrective Action sections. Tasks that rely on or involve a software system must be identified as system tasks. It is optional for non-system tasks to be identified as relating to one of the other FIEs. [Acceptable Values: Policy, Process, System, Control, Audit Evidence, Human Capital. More than one value may be entered in the field.]

Process Level 0. This field is only applicable to tasks in the Corrective Action and Testing sections of the FIP. The summary tasks that define Assessable Units must identify the BEA End-to-End Processes that are contained within the Assessable Unit. Identifying the BEA Process Steps (Levels 1, 2, etc.) for lower level tasks is optional. [Acceptable Values: BEA End-to-End Processes are presented in this guidance in Appendix D at D.2.5.]

Process Level 1. This field is only applicable to tasks in the Corrective Action and Testing sections of the FIP. The summary tasks that define Assessable Units must identify the BEA Level 1 Process Steps that are contained within the Assessable Unit. Identifying the BEA Process Steps for lower level tasks is optional. [Acceptable Values: BEA Level 1 Process Steps are presented in this guidance in Appendix D at D.2.5.]Lead Organization. This required field is only applicable to tasks contained in the Discovery, Corrective Action, and Evaluation sections of the FIP. This field contains the Organization Code or other organizational nomenclature for the organization responsible for accomplishing the task.

Support Organization. This required field is only applicable to tasks contained in the Corrective Action and Testing sections of the FIP. This field contains the Organization Code or other organizational identification nomenclature for the organization responsible for supporting the Lead Organization in accomplishing the task.

Resource Names. This field is only applicable to tasks contained in the Corrective Action and Testing sections of the FIP. This field contains the FIAR Tool User Name(s) for the person(s) responsible for accomplishing/managing each task.

Level of Effort to Complete. This field is only applicable to tasks contained in the Corrective Action and Testing sections. Within these sections, the field is only mandatory for the second level of tasks contained in the work breakdown structure. This field contains the estimation of the total effort required to complete the unfinished work related to the task and supporting detailed tasks. The units for the amounts are Full-Time Equivalent (FTE) years and may be either government or contractor personnel, where a FTE is defined as a person working approximately 40 hours a week for 48 weeks in a year. Therefore, a value of 8 would be 8 people working full-time for a full year, 16 people working full-time for 6 months, 16 people working 50% of their time for one year, or 4 people working full-time for 2 years.

Level of Effort Committed. This field is only applicable to tasks contained in the Corrective Action and Testing sections. Within these sections, the field is only mandatory for the second level of tasks contained in the work breakdown structure. This field contains the estimation of the resources committed in the budget and FYDP to each task. The units for the amounts are FTE years and may be either government or contractor personnel, where a FTE is defined as a person working approximately 40 hours a week for 48 weeks in a year. Therefore, a value of 8 could be 8 people working full-time for a full year, 16 people working full-time for 6 months, 16 people working 50% of their time for one year, or 4 people working full-time for 2 years.

Notes. This field should be used to record the rationale for changes to the FIP that the organization would like to communicate. This field can also be used to indicate and track the type of weakness i.e. control deficiency, significant deficiency, or material weakness (only those identified through prior ICOFR efforts) for the KCOs/KSDs.

FIP Submission Instructions

Updating FIPs

Reporting entities must update their FIPs continually in order for the OUSD(C)/FIAR to monitor and report progress to DoD senior leadership and non-DoD organizations and stakeholders,

such as Congress, OMB, and GAO. The OUSD(C), in collaboration with the DoD reporting entities, developed a standard framework/template along with required data fields for reporting entity FIPs, as shown in **Figure 3** and **Figure 4**. The standard FIP template aligns to the FIAR Methodology and allows reporting metrics to be gathered consistently across the Department.

Ideally, the reporting entity should be using the FIAR PT, described in the following section, to maintain their FIPs. In such instances, when changes are made to the FIPs, such as adding or modifying tasks, adjusting completion dates, and/or updating the percent of completion, the changes will be automatically available to the OUSD(C)/FIAR.

When a reporting entity is not using the FIAR PT to maintain their FIPs, an updated file for each active FIP must be submitted to the OUSD(C)/FIAR no later than the last calendar day of each month. If no changes were made to a FIP during a month, then OUSD(C)/FIAR must be notified as such in the accompanying delivery method (e.g., email) with the FIPs that did change. Active FIPs include, at a minimum, all FIPs for the Wave 2 (SBR) and Wave 3 (E&C) priority areas. Active FIPs also include other non-priority FIPs where improvement work and activity is taking place. Updated FIPs provided by email should be sent in a Zip file to the following email address: fiarsupport@osd.mil.

All FIP data fields must be kept up to date and reflect changes from month to month. For instance, if a task or improvement activity is reassigned to a different organization and/or individual, the appropriate FIP data fields should be updated at the time the changes are made.

The FIAR-PT is an Internet-based resource designed to assist in managing the Department of Defense's financial improvement methodology. The FIAR-PT:

1. Enables reporting entities to organize and report their progress in the FIAR Plan Status Report,
2. Provides a standard tool from which reporting entities manage their FIPs, and
3. Serves as an integrated repository for linking multiple business transformation efforts within the Department.

Many benefits have been realized by making the FIAR-PT accessible over the Internet. Among the obvious advantages are easy access and better communication with other financial management team members, leadership, and stakeholders. Further, making the FIAR-PT Web-accessible keeps involved parties accountable to their shared goal of improving financial management by allowing for real-time visibility of identified deficiencies, corrective action plans, tasks, milestones, and progress. Visibility allows reporting entities to view and analyze existing plans and use them as models for preparing and structuring their own plans. Reporting entities can then better draw on solutions and lessons learned by other financial management teams. By centralizing reporting data, the FIAR-PT helps reporting entity financial management teams view the most current information available and efficiently report status to the rest of the Department.

Performance Metrics

The Department is presently implementing results-oriented metrics to better monitor and

measure progress. Three types of metrics are being implemented to allow the Department to:

1. Track progress in achieving the end-state outcome of auditability by monitoring the reporting entities' progress in achieving a strong internal control program that ensures financial transactions are timely and accurately recorded and reported. This metric tracks the assessment, testing, and remediation of KCOs until they have been determined to be effective.
2. Track reporting entity progress through the standard methodology for audit readiness. See FIAR Guidance for a discussion of the FIAR Methodology.
3. Track progress in accomplishing important objectives impacted by financial improvement activity. This type of metric is also results-oriented, but varies by segment or assessable unit.

The OUSD(C) is working with the OUSD(AT&L) and reporting entities to identify and implement additional results-oriented metrics that can be used to measure progress.

Standard FIP Template

OUSD(C), in collaboration with the DoD reporting entities, developed a standard framework/template for reporting entity FIPs. Please see the accompanying standard FIP template for the required data lines that align to the FIAR Methodology.

Since Wave 3 (E&C) and 4 (Valuation) split financial statement assertions for critical assets, reporting entities have two options when preparing FIPs (also depicted in **Figure 2**):

- Option 1: Maintain separate FIPs if E&C and valuation audit readiness initiatives are developed / executed separately. Structure should be used for a FIP that will result in a single assertion.
- Option 2: Maintain one FIP, but create separate sections for E&C vs. Valuation beginning with the Evaluation Phase, if E&C and Valuation initiatives are combined, but may be distinct.

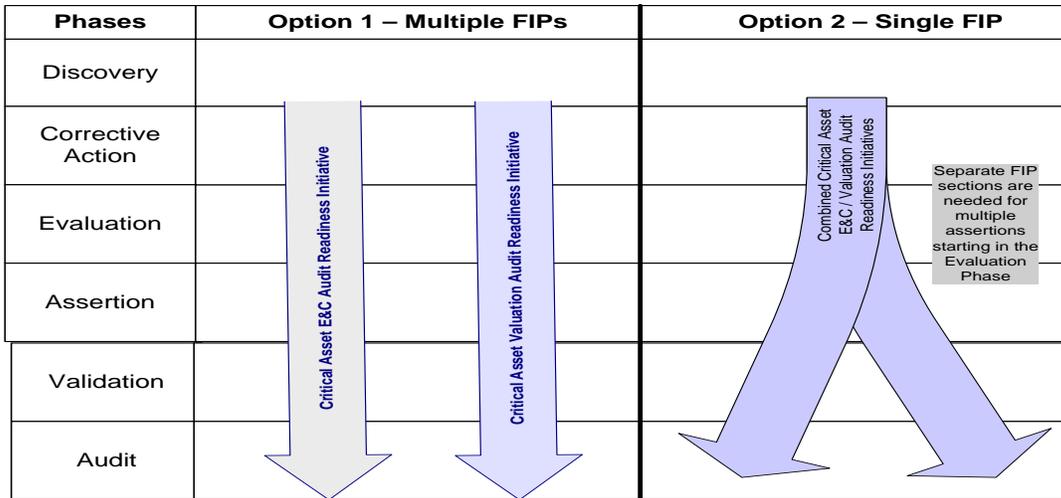


Figure 2. Options for preparing FIPs

The following Standard FIP Structure should be used for a FIP that will result in a single assertion. This structure is not only useful for Assessable Units within the SBR, but is also suited for use on the Balance Sheet, Statement of Net Costs and other financial statement Assessable Units where all phases, including the *Discovery and Evaluation Phase* and *Corrective Action Phase*, will be performed separately.

0	Key Control Objectives/Capabilities and Key Supporting Documents	
		<i>Refer to FIP General Guidance, Template Section Description for instructions related to this section of the FIP.</i>
1	Discovery	
1.1	Statement to Process Analysis	
1.1.1		Using the financial statement and/or line items, prepare a process and system drill down analysis depicting asset/transaction classes, underlying processes, assessable units & sub-units and associated systems -- including "as-is" and any planned "to-be" environments
1.1.2		Using the assessable units, prepare a quantitative drill down depicting the dollar activity (or balances) resulting from each assessable unit (level 1) and sub-unit (level 2) annually. The quantitative drill down should also indicate the percentage of the total line item each assessable unit and sub-unit represents.
1.2	Prioritize	
1.2.1		For each assessable unit identified in the statement to process analysis (step 1.1), rank each in order of quantitative materiality (largest dollar activity is highest priority, etc.)
1.2.2		For each assessable unit, develop a list of qualitative risks or factors associated with the assessable units (e.g., budgetary restriction over representation allowance)
1.2.3		For each assessable unit, develop a systems inventory list to include all current and future systems (including system environments), processes planned to be replaced and the date the replacement will occur. Systems inventory list should include a listing of system users and their access privileges.
1.2.4		Prepare an assessable unit prioritization document listing all assessable units, prioritized by quantitative rank (step 1.2.1) and adjusted for significant qualitative factors (step 1.2.2) and (potentially) scoping-out legacy systems (including system environments) and processes that will not endure until assertion.
1.3	Assess & Test Controls	
1.3.1		For entity level controls and each assessable unit, identify all relevant financial statement assertion risks and corresponding Key Control Objectives (KCOs) and document in Financial Improvement Plans (FIPs). (Note: The GAO's Internal Control Management and Evaluation Tool may be used as support for assessment and test of entity level controls. Refer to FIAR Guidance Appendix D, section D.1.2.)
1.3.2		Starting with the highest priority assessable units (step 1.2.4), prepare process and systems documentation to include narratives, flowcharts, risk assessments, and control worksheets documenting processes, risks (linked to financial statement assertions), control activities (manual and automated), IT general computer controls for significant systems, system certification/accreditations, system and end user locations, system documentation location, and descriptions of hardware/software/interfaces
1.3.3		Prepare controls assessment document for entity level controls and each assessable unit, summarizing key control activities and noted deficiencies for missing control activities or control activities that are not designed effectively
1.3.4		For entity level controls and assessable unit level control activities appropriately designed and in place, develop and execute a test plan to assess the operating effectiveness of control activities
1.3.5		Updated control assessment with the results of tests of controls, indicating the number tested, the number of controls operating effectively and any exceptions or deviations noted during tested
1.3.6		Determine if exceptions or deviations noted during the execution of steps above should be considered deficiencies in the design or operating effectiveness of controls. Evaluate and classify deficiencies in internal controls as control deficiency, significant deficiency or material weakness.
1.3.7		Develop annual ICOFR Statement of Assurance memorandum and summary CAPs for material weaknesses based on results of tests of design and effectiveness of controls performed as part of task 1.3 and 3.1. Summary CAPs should be supported by detailed CAPs included in Section 2 of the FIP.
1.4	Evaluate Supporting Documentation	
1.4.1		Extract and prepare a population of transaction-level detail (or asset-level as appropriate), total the value of the detail, ensure it agrees to the GL accounts and financial statements, and maintain documentation of the reconciliation including support for all material journal vouchers.
1.4.2		Perform initial data mining on populations to identify and address unusual and invalid transactions, and perform a search for and correct abnormal balances (negative obligations, etc.) or missing data fields
1.4.3		By financial statement assertion, identify and document supporting documents (KSDs) needed to adequately support individual transactions or balances (e.g., vendor invoice supports valuation of a disbursement)
1.4.4		Determine how many years of electronic data and supporting documentation are needed to support audit readiness assertion
1.4.5		Develop a test plan, select random samples from the population and execute tests of individual transactions and balances to confirm the existence and evaluate the quality of supporting documentation for all relevant financial statement assertions. Also assess (as part of documentation testing) the location and sources of supporting documentation, verifying policies/procedures and control activities to ensure supporting documentation is retained for a sufficient period of time
1.4.6		Summarize test results and identify deficiencies in documentation. All exceptions above the predetermined tolerable misstatement must be considered deficiencies.
2	Corrective Actions	
2.1	Design Audit Ready Environment	
2.1.1		Design solutions to mitigate deficiencies for control activities, processes and/or systems, and policies and procedures
2.1.2		Design solutions to mitigate deficiencies in supporting documentation
2.2	Develop Corrective Action Plan	
2.2.1		Develop implementation plan to execute designed "to-be" solution, including updating policies and procedures, preparing systems design documents, and drafting documentation templates. A plan must be developed for each deficiency identified. Update FIP with specific corrective action plans (CAPs), classification of the deficiency (control deficiency, significant deficiency or material weakness) and target completion dates.

Figure 3. Single FIP Structure for Single Assertions

2.3		Resource
2.3.1		Develop budget estimates of required resources to execute CAPs
2.3.2		Prepare and submit budget justification/resource management materials as needed
2.4		Execute
2.4.1		Insert CAPs here. Execute systems, process, controls and documentation changes included in CAPs. On a monthly basis update FIPs to reflect progress and accomplishments, including any scope and timeline changes that result during execution
3		Evaluation
3.1		Test
3.1.1		Once corrective actions have been fully implemented, perform update testing to confirm corrective actions (processes, controls, documentation or systems) have successfully mitigated the deficiencies previously identified. Update all process and systems documentation, test plans, control assessments, updated electronic detail populations and reconciliations, documentation summarizing data mining results, test results, etc.
3.1.2		Update controls assessments with the results of tests of controls and identify any control activities with operation or documentation deficiencies that require corrective actions (either new deficiencies or instances where corrective actions proved insufficient)
3.2		Decide
3.2.1		If testing indicates corrective actions were successful, proceed to Assertion Phase
3.2.2		If testing indicates material deficiencies are not addressed, return to Corrective Action Phase: Design Audit Ready Environment (step 2.1) to redefine objectives of "to-be" solution and then initiate corrective action
4		Assertion
4.1		Compile process and system documentation
4.1.1		Compile final, "audit-ready" process and systems documentation that reflects the current, integrated process environment, including process narratives, flow charts, and control assessment forms
4.2		Compile supporting documentation
4.2.1		Compile evaluations of test results, demonstrating sufficient and appropriate supporting documentation exists to assert audit readiness
5		Validation
5.1		Assertion Documentation Review
5.1.1		DoD OIG and FIAR Directorate review assertion documentation to ensure that all required documents have been completed, all required management testing has been performed, and management testing results reasonably indicate audit readiness.
5.2		Assertion Examination
5.2.1		As Wave 1 & 2 individual assessable units are asserted: Engage IPA or other qualified, independent reviewer to perform an examination to validate whether the assessable unit is audit ready per the success criteria identified in FIAR Guidance Section 2. This includes an examination of the latest period-end balances in accordance with AICPA and GAGAS. FIAR Directorate will review examination results and make a final determination on audit readiness and whether to proceed to the Audit Phase or return to Corrective Action.
5.2.2		As Wave 3 assessable units and overall Waves 2 and 4 are asserted: DoD OIG performs an examination to validate whether the assessable unit is audit ready per the success criteria identified in FIAR Guidance Section 2. DoD OIG performs an examination of management's audit readiness assertion (and/or evaluates assessable unit examinations performed in step 6.2.1). This includes examination of the latest period-end balances in accordance with AICPA and GAGAS. DoD OIG will issue an examination report stating their opinion on whether management's assertion of audit readiness is fairly stated and whether to proceed to the Audit Phase or return to Corrective Action.
6		Audit
6.1		Engage Auditor
6.1.1		As Wave 1 assessable units are validated: Engage IPA or other qualified, independent reviewer to perform annual audit. Should the audit demonstrate a strong and effective control environment, the reporting entity can submit a request to the FIAR Directorate, to substitute a cycle other than annually for audits.
6.1.2		As Wave 3 assessable units and overall Waves 2 and 4 are validated: DoD OIG or IPA performs annual audit. For Wave 3 assessable units, should the audit demonstrate a strong and effective control environment, the reporting entity can submit a request to the FIAR Directorate, to substitute a cycle other than annually for audits.
6.2		Support Audit
6.2.1		Perform audit coordination activities, participating in meetings to provide background information
6.2.2		Collect and provide auditor with all requested documentation within established time requirements
6.2.3		Manage all issues and respond to findings raised by the auditors. Work through issues and concerns raised by the auditor that could impede the audit's progress and develop responses to audit findings (including planned corrective actions)
6.3		Auditor Issues Audit Opinion

Figure 3 Cont'd. Single FIP Structure for Single Assertions

For FIPs that will be used to support multiple Assertions (e.g., ME FIP that will contain common *Discovery* and *Corrective Action Phases*, but will have separate E&C and *Assertion, Evaluation, and Audit Phases*), separate FIP sections are needed for multiple assertions starting in the *Evaluation Phase*. The following structure should be used:

0	Key Control Objectives/Capabilities and Key Supporting Documents
	<i>See KCOs and KSDs for each wave in Section 4 of the FIAR Guidance</i>
1	Discovery
1.1	Statement to Process Analysis
1.2	Prioritize
1.3	Assess & Test Controls
1.4	Evaluate Supporting Documentation
2	Corrective Actions
2.1	Design Audit Ready Environment
2.2	Develop Corrective Action Plan
2.3	Resourcing
2.4	Execute
3	Evaluation - ASSERTION 1
3.1	Testing
3.2	Decision
4	Assertion - ASSERTION 1
4.1	Compile process and systems documentation
4.2	Compile supporting documentation
5	Validation - ASSERTION 1
5.1	Assertion Documentation Review
5.2	Assertion Examination
6	Audit - ASSERTION 1
6.1	Engage Auditor
6.2	Support Audit
6.3	Auditor Issues Audit Opinion
7	Evaluation - ASSERTION 2
7.1	Testing
7.2	Decision
8	Assertion - ASSERTION 2
8.1	Compile process and systems documentation
8.2	Compile supporting documentation
9	Validation - ASSERTION 2
9.1	Assertion Documentation Review
9.2	Assertion Examination
10	Audit - ASSERTION 2
10.1	Engage Auditor
10.2	Support Audit
10.3	Auditor Issues Audit Opinion

Figure 4: FIP Structure for Multiple Assertions