

DEPARTMENT OF THE NAVY COMMANDER NAVAL EDUCATION AND TRAINING COMMAND 250 DALLAS STREET PENSACOLA, FLORIDA 32508-5220

> NETCINST 5200.6A N00G 2 Apr 2025

NETC INSTRUCTION 5200.6A

- From: Commander, Naval Education and Training Command
- Subj: NETC INTEGRATED RISK MANAGEMENT PROGRAM
- Ref: (a) Federal Managers' Financial Integrity Act (FMFIA) of 1982
 - (b) GAO-14-704G, Standards for Internal Control in the Federal Government of September 2014
 - (c) OMB Circular A-123, Management Responsibility for Enterprise Risk Management and Internal Control of 15 July 2016
 - (d) 2024 DON Enterprise Risk Management Framework
 - (e) FY2025 DON Integrated Risk Management Program Handbook
 - (f) DODINST 5010.40 of 11 December 2024
 - (g) OPNAVINST 3500.39D
 - (h) OPNAVINST 5200.25F
 - (i) NETCINST 5040.1D
 - (j) NETCINST 5000.1D
 - (k) NETCINST 5450.3B

Encl: (1) Definitions

- (2) Naval Education and Training Command Force Development Strategic Plan Fiscal Year 2023-2027
- (3) Naval Education and Training Command's Integrated Risk Assessment Methodology

1. <u>Purpose</u>. To provide policies and assign responsibilities for the Naval Education and Training Command (NETC) Integrated Risk Management (IRM) Program. This instruction cancels the Managers' Internal Control Program (MICP).

2. Cancellation. NETCINST 5200.6

3. <u>Scope</u>. This instruction is applicable to all NETC Headquarters (HQ) and domain personnel. All commanders,

commanding officers (CO), and directors are responsible for establishing and monitoring internal controls (or management safeguards) for their commands. References (a) through (k) apply. Internal controls are built into work processes by managers and process owners to provide reasonable assurance that resources are safeguarded; information is accurate and reliable; laws, regulations, and policies are adhered to; and economy and efficiency are achieved. As such, the IRM Program applies to all programs and functions.

4. Background

a. The Budget and Accounting Procedures Act of 1950 required that each agency head establish and maintain a system of accounting and internal control. The expectation was that such a system would help diminish fraud, waste, abuse, and mismanagement in federal government operations. In August 1980, the Act notwithstanding, the Government Accountability Office (GAO) reported that widespread internal control breakdowns continued to occur in the federal government.

b. As a result of the GAO findings, Congress passed reference (a) in September 1982. The Federal Managers' Financial Integrity Act (FMFIA) mandates that each executive agency's internal accounting and administrative controls be established per standards prescribed by the Comptroller General. In reference (b), the GAO provides the standards for internal control in the government. Further, the Act requires that the Office of Management and Budget (OMB), in consultation with the GAO, publish guidelines for agencies to use in establishing, maintaining, evaluating, improving, and reporting annually on their internal control systems. The OMB guidelines are spelled out in reference (c).

c. Reference (d) is used to identify and describe the structure and operations to support the implementation of the Department of the Navy's (DON) Enterprise Risk Management (ERM) capabilities. Reference (e) assists business process owners, senior accountable officials (SAO), and COs by identifying the objectives of a strong DON IRM Program and provides guidance and direction for integrating ERM and internal controls across the DON. Reference (f) establishes policy, assigns responsibilities, and provides procedures for implementing an integrated ERM and risk management and internal control (RMIC) framework per

2

OMB Circular No. A-123 and OMB Circular No. A-11 requirements. Reference (g) establishes policy, guidelines, procedures, and responsibilities to standardize the operational risk management (ORM) process across the Navy. Reference (h) provides implementation policy and guidance to the IRM program and replaces the MICP.

5. Discussion

a. The DON IRM Program is derived from the requirements specified in the OMB Circular No. A-123 "Management Responsibility for Enterprise Risk Management and Internal Control." It requires federal agencies to implement and integrate ERM and internal controls which include both financial and operational (e.g., non-financial) areas. During audits and inspections, external agencies (GAO, Department of Defense (DoD) Inspector General, Naval Inspector General, and Naval Audit Service) may review command compliance with this program. During NETC command inspections, compliance with the IRM Program will be reviewed. See reference (i) for guidance concerning the Command Inspection Program.

b. The NETC IRM Program also stresses using a variety of existing methods to gauge the effectiveness, efficiency, and economy of work processes (WP) or assessable units (AU). A process is defined as the manner in which resources are employed in generating a product, performing a responsibility, or rendering a service in support of the Navy's mission. It consists of starting and ending points that are connected by a series of decision points and various work-related steps. Strategically located throughout the process should be key metrics (performance indicators) for gauging how well the process is performing.

c. Specifically, internal controls (management safeguards) are the organization, policies, and procedures used to reasonably assure:

(1) Programs and operations achieve intended results in support of command strategic goals and objectives.

(2) Resources are used consistent with the Navy's mission.

3

(3) Programs and resources are protected from fraud, waste, and mismanagement.

(4) Laws and regulations are followed.

(5) Reliable and timely information is obtained, maintained, reported, and used for decision making.

d. Internal controls are to be integrated into the daily practices of all managers, and must:

(1) Encompass all operations and mission responsibilities of an organization.

(2) Not be duplicative of existing information that pertains to evaluating the effectiveness of internal controls.

(3) Be advocated and supported by organizational leadership.

(4) Identify, report, and correct material weaknesses and significant deficiencies. These are instances where internal controls are not in place, not used, or not adequate. The attention of the next higher level of management is required.

6. Relationship of the Command Evaluation (CE) Program to the NETC IRM Program. Reference (j) provides NETC policy and quidelines for conducting internal reviews. The NETC CE Program is a disciplined in-house method for performing independent reviews of activity operations and processes. It is a proactive mechanism for internally detecting and correcting a condition that may adversely impact mission, command integrity, or the economical use of resources. It may also be utilized as a preparatory tool for NETC command inspections. During in-house reviews, internal controls should be routinely evaluated for adequacy. Where warranted, CE recommendations are directed to the appropriate manager for corrective action. The individual performing the review is not responsible for establishing, maintaining, or improving internal controls. This falls under management's purview. The CE Program also includes the NETC audit liaison roles and responsibilities.

7. <u>Relationship of Immediate Superior in Command Oversight and</u> <u>NETC Command Inspection Program to the NETC IRM Program</u>. The <u>NETC IRM Program is the foundation for the NETC Command</u> Inspection Program. Reference (i) provides the guidelines for performing a command inspection. By completing the process analysis associated with the NETC IRM Program, a command can also simultaneously prepare for a command inspection. This approach allows the command to stay in a perpetual state of readiness for any inspection, review, or audit. The NETC IRM Program can give a command an effective mechanism to quickly gauge the health of a process with a minimum investment of time and effort.

Relationship of ORM to the NETC IRM Program. ORM involves 8. identifying and assessing process hazards (risks or vulnerabilities) and implementing controls to reduce the risk associated with any process operation. Guidelines for the ORM process are discussed in reference (g). An operation should be continuously monitored for effectiveness of controls and situational changes. The WP and AU flowcharts, developed through the NETC IRM Program, provide a solid framework for assessing risks and evaluating the effectiveness of controls. With the inclusion of key metrics, the flowchart is a useful tool for pictorially displaying pulse points, which permit a rapid preliminary evaluation of various aspects of risk. This method allows the manager to identify and isolate risky areas very quickly. Consequently, managers are able to make better informed decisions about how best to reduce the severity of risk.

9. <u>Definitions</u>. IRM Program definitions are discussed in enclosure (1).

10. <u>Policy</u>. As directed per reference (c), NETC HQs and the NETC domain are responsible for establishing and maintaining internal controls to achieve specific internal control objectives related to strategic plans, operations, reporting and compliance. Internal control standards must be consistently applied to meet internal control principles and components and to assess and report on internal control at least annually. It is the policy of NETC that all NETC HQ and domain activities develop, implement, maintain, review, and improve internal controls. On an ongoing basis, all commands must be vigilant

5

concerning the adequacy of internal control systems. All levels of management must comply with the guidelines of this instruction.

a. Per reference (h), NETC (including NETC HQ and domain) will establish an independent IRM team or office, led by the IRM Coordinator, that has direct access to the executive offices.

b. NETC HQs requires that both an IRM Coordinator and an alternate IRM Coordinator be appointed in writing (by their commander, CO, or director, as applicable) for both NETC HQs and NETC subordinate commands. The primary and alternate coordinators will share IRM management responsibilities in order to ensure the functions are covered at all times and that the alternate could replace the primary coordinator (if and when necessary).

Echelon 2 commands must have full-time IRM coordinators с. and IRM coordinator duties must be identified on their position descriptions (PD) (if civilians), or formal job duties (if active duty). Active duty IRM coordinators or alternates must also be appointed using the IRM Coordinator Appointment Letter template in reference (h). Echelon 3 and their subordinate commands are not required to have full-time IRM coordinators or alternates. Their IRM coordinators or alternates must have an appointment in writing, either via their PD (if civilian), or the IRM Coordinator Appointment Letter template. If NETC domain civilian IRM coordinator duties are not cited on their PDs, they must also use the IRM Coordinator Appointment Letter template to be appointed as IRM coordinator or alternate. No IRM coordinators will be located in the Inspector General or Comptroller Offices. IRM coordinators are responsible for the administration and coordination of the IRM Program.

d. NETC HQ and domain activities will appoint, in writing, AU Managers (AUM), via the AUM Appointment Letter template in reference (h). AUMs must be appointed by the commander, CO, or director (as applicable). AUMs must be military or civilian employees serving in leadership positions that serve as process level managers for their assessable units. They are responsible for assisting the IRM coordinator by providing oversight of their business processes or assessable units and administering the IRM Program to align with the reporting requirements of the FMFIA.

e. NETC HQs and domain activities may appoint, in writing, AU Representatives (AUR). If applicable, AURs are appointed by AUMs using the AUR Appointment Letter template per reference (h). AURs must be military or civilian employees. They are responsible for assisting the RMIC coordinator and AUM in RMIC reporting requirements.

f. The NETC Force Development Strategic Plan Fiscal Year (FY) 2023-2027 is described in enclosure (2).

g. NETC's mission, functions, and tasks are cited in reference $\left(k\right).$

h. NETC's Integrated Risk Methodology is described in enclosure (3).

11. Roles and Responsibilities

a. The NETC Commander will facilitate the implementation of an effective governance process to establish and maintain compliance with IRM policy and requirements. Commander, NETC (CNETC) will involve management at all levels to ensure the requirements of reference (h) are completed.

b. IRM Coordinators will:

(1) Provide IRM oversight and the establishment of an effective governance process to ensure that NETC HQ and the NETC domain is adhering to all policies and procedures.

(2) Analyze, compile, and coordinate signature of the annual IRM SOA certification statement.

(3) Identify best business practices and recommend ways to improve control documentation, enhance controls, eliminate inefficient controls, or implement new controls.

(4) Ensure identified efficiencies, "best practices," and deficiencies are shared within the command.

- (5) Review assessments.
- (6) Assist AUMs and process owners or managers to:

(a) Establish risk management practices to identify and manage risks related to mission-support and other operations as determined by management.

(b) Identify internal control objectives based on risk assessment.

(c) Perform self-assessments of organizations and core business lines, identifying deficiencies and developing corrective action plans (CAP), including milestones to correct deficiencies.

(7) Maintain documentation (such as process flows and narratives, associated risk matrices, control objectives, control activities, and SOA certification statements) from AUMs that will assist in the completion of IRM requirements such as operational process flows, narratives, risk documentation, testing, and certification statements.

(8) Liaise with the Director, Navy Staff (DNS)-F5 Internal Control Office on all items related to ERM and IRM reporting, operational, strategic and compliance endeavors.

(a) Communicate with the DNS-F5 Internal Control Office and appropriate IRM governance body regarding any material weaknesses or deficiencies identified through internal assessments that may impact the commands' level of assurance over its internal control environment or a DON-level deficiency or strategic initiative.

(b) Monitor and track CAP implementation for material weaknesses listed in the SOA certification statement.

(9) Complete applicable internal control or IRM training as defined by the Chief of Naval Operations (CNO) and as directed per reference (h).

(10) Ensure the command's AUs and WPs are reviewed annually and updated by cognizant managers.

(11) Ensure AUs and WPs are flowcharted (to include key metrics) and internal control system tests (ICST) and ORM assessments have been performed.

(12) Ensure risk assessments and internal control evaluations are completed, as required by CNO.

12. <u>Procedures</u>. To ensure NETC documents risks and evaluates internal controls to mitigate those documented risks, the following annual procedures are required:

a. Segment the Activity and Assign Responsibilities

(1) Categorize command WPs and AUs into a WP inventory that reflects mission critical and associated support processes. For each process, ensure that a responsible manager is identified.

(2) Based upon mission and associated support, commands may have significantly different inventories. To evaluate the WP and AU, develop, at a minimum, a one-page mid-level linear flowchart. The flowchart should depict the process from start to finish. An important by-product of a flowchart is the identification of two to three key metrics (performance indicators) that permit routine testing for effectiveness, efficiency, and economy. Documentation must be retained inhouse for turnover and audit or inspection purposes. It also supports the requirement for performing process self-assessments in preparation for NETC command inspections.

(3) The flowchart defines how the process works. It shows interrelationships with other processes, as well as redundancies. Internal control points are displayed in the form of process and decision steps, which serve as prime measuring points. Each point becomes a quality indicator that can be quickly assessed for efficiency, effectiveness, and economy. This assessment provides a picture of risk and vulnerability to internal control breakdowns. This characteristic of the flowchart also affords a non-subject matter expert an opportunity to make a reasonable assessment. Ultimately, this approach permits the command leadership an opportunity to swiftly evaluate command processes. For this reason, flowcharts are invaluable turnover tools.

b. Strategic Goals, Key Metrics, ICST, and ORM Assessment

(1) Ensure each process is examined for efficiency, effectiveness, and economy. Each process should be tied to a

command strategic goal or objective. Identify the two to three key metrics that can be used to measure performance. For ready reference, ensure the locations of the key metrics are clearly annotated on the process flowchart. These metrics should provide a quick look as to how well a process is progressing in achieving its intended purpose.

(2) Ensure internal control evaluations are conducted for mission critical, associated support, and universal work processes. The ICST (NETC 5200/1) is used by NETC to document internal control testing. Internal controls provide reasonable assurance that the objectives of the program and process are achieved. They are designed to mitigate risks, ensure what should occur in daily activities does occur on a continuing basis, ensure processes are working as desired, reduce error, and identify problems as they occur. Additional internal control evaluation methodology is also required by CNO and DNS-F5.

(3) Under the guidelines of reference (g), ensure an ORM assessment has been performed for mission critical, associated support, universal WPs and any process deemed high risk. ORM involves identifying and assessing process hazards (risks and vulnerabilities) and implementing internal controls to reduce the risk associated with any process. NETC requires the use of the ORM Assessment (NETC 5200/2) to provide a streamlined format for completing a risk assessment. Additional risk assessment methodology is also required by CNO and DNS-F5.

(4) Ensure annual ICST and ORM assessment forms are properly attested to, signed, and dated by the appropriate individuals.

c. Annual IRM SOA Certification Statement

(1) To demonstrate the existence of a clear audit trail of accountability at the activity level, department heads must submit a signed annual SOA certification statement to the commander, CO, or director. The reporting cycle runs from 1 October through 30 September.

(2) Echelon 2 commands must submit their final (signed) SOA certification statement which includes a consolidated risk assessment, internal control evaluation, and CAPs (if applicable), to the DNS and DNS-F5 by 30 April.

(3) Each FY, NETC must complete a required risk assessment and internal control evaluation via the risk assessment and internal control evaluation spreadsheets. The risk assessment spreadsheet identifies and categorizes risks related to significant operational and financial areas or programs that leadership deems as critical to achieving mission objectives, and that may impact the quality of data that management relies on for operational decision making. It assesses the identified risks by applying a risk rating criterion to evaluate the overall exposure to the risks associated with the operational area and documents the command's risk response strategy. The internal control evaluation spreadsheet which is used to document control activities and testing. Both the risk assessment and the internal control evaluation are included as enclosures in the annual certification statement of assurance.

(4) Echelon 3 commands must submit a consolidated statement that reflects chain of command compliance by both echelon 3 commands and their subordinate commands. Commanders and COs reporting directly to NETC must provide electronically a signed SOA certification statement along with applicable enclosures to the NETC IRM Coordinator for compilation.

13. Action

a. Heads of Activities

(1) Comply with the policies and procedures set forth in this instruction.

(2) Ensure that all responsible managers actively participate in the IRM Program and that their participation is considered during annual performance evaluations.

(3) Ensure that appropriate training is provided to responsible managers and IRM Program coordinators.

b. <u>Activities Reporting Directly to NETC</u>. Complete the above actions and the following:

(1) Ensure appropriate managers evaluate field level reports pertaining to their area of responsibility and alert other cognizant commands of unusually good or bad conditions reported.

(2) Ensure planned actions for correcting material weaknesses or significant deficiencies are completed in a timely manner.

(3) Assess program compliance at subordinate commands.

14. Records Management

a. Records created as a result of this instruction, regardless of format or media, must be maintained and dispositioned per the records disposition schedules located on the DON Assistant for Administration, Directives and Records Management Division portal page at <u>https://portal.secnav.navy.</u> <u>mil/orgs/DUSNM/DONAA/DRM/Records-and-Information-Management/</u> Approved%20Record%20Schedules/Forms/AllItems.aspx.

b. For questions concerning the management of records related to this instruction or the records disposition schedules, please contact the local records manager.

15. <u>Review and Effective Date</u>. Per OPNAVINST 5215.17A, NETC will review this instruction annually around the anniversary of its issuance date to ensure applicability, currency, and consistency with Federal, DoD, Secretary of the Navy, and Navy policy and statutory authority using OPNAV 5215/40 (Review of Instruction). This instruction will be in effect for 10 years, unless revised or cancelled in the interim, and will be reissued by the 10-year anniversary date if it is still required, unless it meets one of the exceptions in OPNAVINST 5215.17A, paragraph 9. Otherwise, if the instruction is no longer required, it will be processed for cancellation as soon as the need for cancellation is known following the guidance in OPNAV Manual 5215.1 of May 2016.

16. <u>Forms.</u> The following forms are available for download from the NETC public web site (<u>www.netc.navy.mil</u>). Other IRM templates and forms will be provided by the NETC IRM Coordinator.

a. NETC 5200/1 (Internal Control System Test)

b. NETC 5200/2 (Operational Risk Management Assessment)

c. NETC 5200/4 (Material Weakness Significant Deficiency or Status of Corrective Actions)

/ J **K**KO

Releasability and distribution:

This instruction is cleared for public release and is available electronically on the NETC public web site (www.netc.navy.mil) or by e-mail at netc-directives@us.navy.mil.

DEFINITIONS

1. <u>Assessable Unit (AU)</u>. To support its control environment, the DON has structured itself into AUs or subdivisions to appropriately define strategic objectives and business processes, implement and assess internal controls, and provide adequate oversite and management for each of the DON's core functions. AUs are identified based upon the programs, processes, administrative activities, or functions significant to mission accomplishment.

2. Assessable Unit Manager (AUM). The AUM must be a military member or government civilian with the knowledge of daily operations of an AU. The AUM can be appointed by either the commander, CO, or director (as applicable) or the RMIC coordinator. AUMs serve as the action-level managers of AUs who support RMIC coordinators fulfilling IRM program requirements and oversee the processes within their AU's purview.

3. <u>Assessable Unit Representative (AUR)</u>. The AUR must be a military member or government civilian serving within an organization supporting the efforts of an AUM. The AUR is appointed by the AUM and supports all AU activities. The AUR communicates regularly with the appropriate command's RMIC coordinator.

4. <u>Business Process Operations</u>. The activities, processes, functions, interfaces, automation, or communication performed to achieve a specified objective or combination thereof:

a. The summation of all efforts expended in achieving a defined objective apart from unique classifications supporting the entity's (e.g., component, AU) functioning such as reporting.

b. Business process operations may be further classified to characterize the nature of those business process operations such as administrative, financial, engineering, production, logistical, maintenance, safety, public relations, or information technology (IT) performed for an entity (e.g., component, AU, combat support operations entity (to include supply, logistics, financial support, medical support, maintenance, but not including military warfighting operations).

5. <u>Control Activities</u>. Ensures management directives are carried out. They are the policies, procedures, techniques, and mechanisms that enforce management's directives and provide reasonable assurance that actions are taken to address risks. Control activities are an integral part of an entity's planning, implementing, reviewing, and accountability for stewardship of government resources and achieving effective results.

6. <u>Corrective Action Plans (CAP)</u>. AUMs are to evaluate findings from both self-reported issues and external audits and reviews, determine proper actions in response to self-reported findings and recommendations from audits, and complete, within the established time frames, all actions that correct or otherwise resolve the matters brought to management's attention. This documentation can and should be used to back up the annual SOA certification statement.

7. <u>Deficiencies</u>. Deficiencies are results from assessments, inspections, evaluations, audits, or any other type of review. These results indicate non-compliance to instructions or policies.

8. <u>Documentation</u>. Documentation of internal control activities is required to the extent needed by managers (military and civilian) to control operations effectively, and to evaluate the comprehensive nature of their programs. IRM documentation is mandated by reference (c), and must include:

- a. Inventory of AUs.
- b. Risk Assessments.
- c. Internal Control Assessments.
- d. CAPs (if applicable).
 - Note: Documentation can also include process narratives; flow charts; organizational charts; and quarterly status on corrective actions. Key supporting documentation must be maintained, per this instruction, for subsequent review by management and inspector general or audit personnel.

9. <u>Findings</u>. Findings are results from assessments, inspections, evaluations, audits, or any other type of review. These are process improvement recommendations.

10. Integrated Risk Management (IRM) Coordinator. IRM coordinators must be military members or government employees serving in leadership positions that serve as the command's focal point, disseminating guidance and procedures to fulfill the intent of the IRM Program. IRM coordinators are appointed by their CO or head of command.

11. <u>Internal Assessments and Reviews</u>. An impartial and objective appraisal or verification of data, procedures, and performance of operations, systems, activities, programs, functions, and internal controls. Internal assessments are conducted to determine if command resources are managed properly and in compliance with laws and regulations; command programs are achieving their objectives and desired outcomes; and command services are being provided efficiently, economically, and effectively. Internal assessments also help management identify risks and develop process improvement initiatives. Internal assessments are conducted by the CE Officer or their designee.

12. <u>Internal Control</u>. An integral component of an organization's management process that provides reasonable assurance that the following is being achieved: effectiveness and efficiency of operations, reliability of reporting for internal and external use, and compliance with applicable laws and regulations. Internal controls are the plans, methods, and procedures used to meet missions, goals, and objectives. Internal controls are the first line of defense in safeguarding assets and preventing and detecting errors and fraud. Internal controls are not single events, but a series of actions and activities that occur throughout operations on an ongoing basis.

13. Internal Control Assessment (Test). A documented evaluation on the effectiveness and adequacy of the internal control system to provide reasonable assurance that mission objectives will be achieved.

14. <u>Material Weakness (MW) - Criteria</u>. A MW exists when a condition results in a relatively high risk of loss, errors, or irregularities in relation to the assets or resources being managed. Professional judgment, based on applied common sense,

Enclosure (1)

must be used when determining materiality. A MW is an internal control deficiency that the agency head determines to be material enough to report outside the agency due to its impact and likelihood or potential impact and likelihood to mission, resources, or image. It warrants the attention of the next level of leadership or command, either to act or for awareness. "Material to the DON" is the final determination of whether a MW is to be included in the annual SOA certification statement.

15. <u>Non-compliance</u>. A nonfulfillment or failure to meet a requirement as specified by governing policies, procedures, laws, or customers.

16. <u>Process Owner or Manager</u>. The person within an AU who directs and manages the activities associated with a specific process.

17. <u>Risk</u>. A probability or threat of damage, injury, liability, loss, or any other negative occurrence that is caused by external or internal vulnerabilities, and that may be avoided through preemptive action (e.g., the establishment of internal controls). Risk is classified as either low, moderate, or high.

18. Significant Deficiency (SD). Similar to a MW, the SD materiality level designation is a management judgment decision on an issue that warrants senior leadership visibility and resolve for remediation. SDs are often differentiated from MWs in terms of their overall severity on the organization and level of action outside and above the organization's leadership or command needed; SDs are considered by management as detrimental to objective completion, but internally manageable and remediable. An internal controls over operations SD is an operational control or a combination of operational control deficiencies that adversely effects the organization's ability to satisfy its mission or be compliant with relevant laws, regulations, and policies, or both. The SD inhibits effective and efficient business process operations and performance reporting.

19. <u>Statement of Assurance (SOA)</u>. This statement (also known as Certification Statement) documents risks and internal controls via the Risk Assessment and Internal Control Evaluation Summary enclosures and can include key financial, operational, and IT system internal controls and risks that are part of a

Enclosure (1)

command's primary business operations. It attests to the level of assurance that internal controls have been assessed and evaluated and can also include MW or SD and associated CAPs (if applicable).

FORCE DEVELOPMENT STRATEGIC DESIGN

Force Development's (FD) strategic vision aligns to CNO's Navigation Plan (NAVPLAN) 2023 and the MyNavy Human Resources (HR) Strategic Design and seeks to deliver the most capable force possible to our numbered fleets with a strong focus on outcomes and a "Get Real, Get Better" culture. Our plan is forward-looking and identified the strategic actions necessary to meet future fleet requirements and expertly recruit, train, and deliver Sailors to the fleet.

STRATEGIC PLAN COMPONENTS

Mission: Our organization's purpose.

Vision: Where our organization is going.

<u>Strategic Goals</u>: Broad primary outcomes conveying what FD desires to achieve our vision.

<u>Strategic Objectives</u>: Clear end states and outcomes FD must achieve to reach our strategic goals.

<u>Annual Goals</u>: Annual milestones or performance measures FD must accomplish.

The following strategic goals were identified for FY23-27 to guide FD actions supported by discrete strategic objectives and annual goals. FDs focus will be on achieving the following three strategic goals:

- Recruit, forge, and deliver combat-ready warfighters.
- Transform FD to optimize capabilities.
- Strengthen and enhance the FD team to support an outcomefocused organization.

MISSION

"Recruit, develop, and deliver combat ready warfighters to the fleet."

FD's mission is to recruit and hire talented civilians, transform them into Sailors, and distribute accession Sailors to the fleet. Additionally, FD provides specialized training and educational tools to advance the personal and professional development of Sailors throughout their career to maximize readiness and ensure mission success.

VISION

"Leverage cutting-edge learning science and enabling technology to build our competitive advantage."

Rapid innovations in technology and the science of learning provide an opportunity within FD to gain efficiencies and improve our business processes and HR services. New tools give recruiters more flexibility in the field and support modernized experiences that enable recruiter production. Advances in the science of learning allow training agencies to more efficiently transfer knowledge to improve learning retention and overall outcomes, targeting the right training content to the time and place of need as part of Ready Relevant Learning. Investments in our recruits during basic training provide the opportunity to redefine the value and qualifications a basically trained Sailor brings to the fleet. Our FD strategic design lays out our plan to achieve our vision and realize these strategic ambitions.

GUIDING PRINCIPLES

"Provide the framework that inform our actions every day, at every level of the organization."

- Lean forward and strive for elite performance: Set high goals that expand the limits of team performance, surge when our goals are within reach.
- Have a bias for action: Go beyond describing challenges. Leverage Performance to Plan and Navy Performance Improvement Educational Resource principles to constructively address issues. Take professional risk to identify issues and elevate barriers.

- Operate with transparency, integrity and accountability: Demonstrate a commitment to excellence, hard work, honesty, and fairness in all we do.
- Foster connectedness within FD and beyond: Mission readiness improves when Sailors and team members feel respected and empowered as part of an inclusive and collaborative culture.
- Deliver unparalleled service: Promote a customer-centric culture that delivers unparalleled service, providing solutions with speed, accuracy, clarity, transparency, and accessibility.
- Promote data-driven and predictive analytics: Make decisions based on data rather than intuition or observation. Use predictive analytics to effectively resource and drive positive outcomes.

NAVAL EDUCATION AND TRAINING COMMAND'S INTEGRATED RISK ASSESSMENT METHODOLOGY

1. NETC Integrated Risk Assessment Methodology

a. NETC administers the IRM to provide reasonable assurance that resources are safequarded, information is accurate and reliable, laws, regulations, and policies are adhered to, and economy and efficiency are achieved. The purpose is to ensure that internal controls are in place within Navy programs to ensure programs remain compliant with governing instructions. The primary responsibility of the NETC IRM in terms of program execution and reporting, resides within a network of Major Assessable Units (MAU). Each MAU within the NETC domain and each NETC HOs AUM utilizes the elements of IRM Internal Controls Over Reporting (ICOR) (to include operations and financial) to develop process flowcharts for all command work processes subject to risk and assess risk utilizing ORM. NETC MAU process owners and NETC HQs AUM's conduct a risk assessment of their work processes and assign a risk assessment code (RAC) to each. NETC MAUS provide NETC with their own annual certification statements and NETC HQs AUMs provide NETC with an annual departmental certification statement. They also maintain sufficient documentation to support this evaluation and level of assurance.

b. Primary responsibility of NETC IRM is to establish and implement effective program reporting and execution within the NETC domain utilizing the elements of IRM internal controls for all command work processes subject to risk. NETC HQ and its domain MAU process owners conduct risk assessment of their work processes and assign risk likelihood and impact. NETC HQ and MAUs maintain sufficient documentation for level of assurance and evaluation.

c. The NETC Integrated Risk Assessment Methodology articulates NETC risk objectives and tolerances within the context of its mission and scope. Risk objectives are defined in measurable terms to better enable the design of internal controls. Risk tolerances provide for acceptable levels of performance variation relative to the achievements of objectives. Risk assessments are a key step in the certification statement lifecycle each year, during which time

NETC identifies pertinent risks, both internal and external, fraud risk, impact, and consolidates an inventory of such risks to submit to leadership.

d. NETC's Risk Assessment Methodology follows a five-step process:

(1) Set Objectives - Identify and document key management functions and reporting objectives related to lines of business and execution of key business processes by commands.

(2) Identify Risks - Identify threats, vulnerabilities or other obstacles to achieving identified financial management and reporting objectives.

(3) Document Current Risk Mitigations - Identify and document existing internal controls or other measures that are currently in place to mitigate identified risks.

(4) Rate and Prioritize Risks - Rate the severity, magnitude, and likelihood of identified inherent risks (risks before mitigating controls), and residual risks (risks taking into account mitigating controls). Risks should be assigned a prioritization level based on the assessment and rating of each risk.

(5) Respond to Risks - Document actions needed for further risk mitigation (process improvements, corrective actions, new controls) and determine future internal control assessment priorities base on risk assessment results. NETC will adhere to the following risk response strategy:

(a) High Risks - Develop and implement CAPs, business process improvements, improved controls, or other mitigation strategies to address the high level of risk.

(b) Moderate and Low Risks - Prioritize, plan, and conduct future internal control assessments.

e. Results of annual risk assessments will serve as the basis for both short-term (current year) and long-term (future years) internal control assessment plans and will be documented and reported to in NETCs' annual certification statement. These certification statements are used as the primary source

Enclosure (3)

documents for NETC's determination of risk and reasonable assurance over the effectiveness of internal controls within the NETC organization. When directed by higher authority, NETC MAUS and HQs AUMs conduct a focused risk assessment of business operations subject to fraud. As directed by higher authority, NETC also utilizes the IRM Risk Assessment to document risks associated with specific mission objectives, assign risk likelihood, and describe mitigation methods.

2. Control Activities

a. Internal controls are designed to meet the identified risk objectives and to mitigate risk throughout NETC. Appropriate types of control activities should be designed based on the organization's activities and mission (e.g., reviews and reconciliations, physical control over vulnerable assets, access restrictions to sensitive records, etc.). NETC implements policies and procedures that respond to risks in the internal control system and ensure management directives and NETC's objectives are achieved. Furthermore, segregation of duties in designing control activity responsibilities helps prevent fraud, waste, and abuse in the internal control system and should be utilized within an internal control system.

b. Control activities are implemented to address the identified risks obtained through the Integrated Risk Assessment process. Some common control activities implemented throughout NETC and the DON include:

(1) Top-level reviews of actual performance.

(2) Reviews at the functional or activity level.

(3) Internal controls over information processing and information systems.

(4) Internal controls over the quality of the data within the information systems.

(5) Segregation of duties throughout various end-to-end business segments.

(6) Documentation and document retention.

(7) Inventory internal controls for vulnerable and valuable assets.

3. <u>Command Reportable Deficiencies</u>. NETC HQs and domain report conditions that are not favorable to their programs, processes, or mission. Deficiencies serious enough, in the judgment of the command, to be reported at the command level or to the next higher level or echelon for resolution must be included. Significant deficiencies and MWs or other reportable conditions are brought to the attention of the NETC AUM (and CNETC, if applicable) for review and resolution determination (which may include reporting on the annual Statement of Assurance Certification statement).

4. <u>Governance</u>. NETC follows the guidelines as directed by the DON IRM governance structure (e.g., audit committee, senior management council, senior assessment team, etc.) as well as ERM for ICOR.

5. Internal Control Assessment (Testing)

a. Internal control assessment through testing is critical to the CNO and DNS internal control risk and compliance infrastructure. Continuous testing of internal controls is crucial for identifying poorly designed, missing, or ineffective controls. Each organization's management is responsible for monitoring, assessing, and improving controls and reporting on the overall effectiveness of their controls to leadership and ultimately, the CNO DNS-F5. NETC performs internal control testing throughout the year based on the following factors:

(1) Prioritized risks (e.g., high-level risks) identified within the integrated risk assessment.

(2) Compliance with federal, statutory, and regulatory requirements.

(3) DoD, DON, and CNO DNS-F5 and organization-level directives.

(4) Results from internal and external reviews and inspections including data quality assessments.

(5) Part of a CAP or remediation activity.

(6) Newly implemented or improved process.

b. Testing should be sample appropriate to include additional internal pulls to ensure the testing gives a realistic view of performance. At a minimum, control testing documentation within NETC includes the following information:

(1) Controls that were tested including the control's number, description, type, and frequency.

(2) Methods used to test key internal controls.

(3) Purpose the evaluation was conducted (e.g., scheduled, required, or ad hoc).

(4) The date the evaluation was conducted.

- (5) The individual who conducted the evaluation.
- (6) Key supporting documents or evidentiary artifacts.
- (7) Sampling methodology and pass or fail thresholds.
- (8) Test procedures and attributes.

(9) What internal control weaknesses (if any) were detected based on assessment of the results?

(10) Corrective actions that were designed, planned, or taken (e.g., reference the applicable CAP created or in place).

c. NETC utilizes the ICST to evaluate and document internal controls for all command operational work processes applicable to risks. Key metrics applicable to each work process are identified and internal controls are tested via the following methods: physical inspections, document reviews, manager reviews, and data evaluation. NETC also documents internal controls using the Internal Control Evaluation Summary as directed by higher authority.

d. Financial "Internal Control over Financial Reporting" and "Internal Control over Financial Systems" internal control testing from both internal and external components (U.S. Bureau of Naval Personnel and DNS-F5, as applicable), are robust enough

such that an independent reviewer performing the same documented test procedures, as outlined in the test plan, would reach similar conclusions. All submissions reviewed and validated by NETC HQ Financial Improvement and Audit Readiness Program Manager for appropriate key supporting documentation. Testing documentation electronically uploaded to requestor must be stored in an orderly and comprehensible fashion and made available if NETC is subject to audit or inspection.

e. Internal control documentation is required by NETC to be robust enough such that an independent reviewer performing the same documented test procedures, as outlined in the test plan, would reach similar conclusions. NETC has the appropriate documentation policies designed that require the retention of documentation for each completed internal control evaluation. The documentation is stored in an orderly and coherent fashion and made available in the event that NETC is subject to audit or inspection.

f. NETC control testing documentation is stored by each process owner either as physical files or electronically on their command or departmental shared drive.

6. Monitoring

a. Continuous monitoring of all activities ensures that progress made against identified risk, gap areas, and deficiencies are promptly addressed and corrected. All NETC AUs utilize the elements of IRM and ICOR to develop process flowcharts, assess risk utilizing ORM, and evaluate internal controls for each work process via the ICST.

b. Continuous monitoring of operations, financial reporting, and systems utilizing the elements of IRM ICOR helps develop process flows which assess risk and evaluate internal controls for each process. The IRM Program established a systematic approach for evaluations and assessments. Managers are responsible for deciding how to conduct their evaluations. The methods should provide reasonable assurance that the organization is achieving its objectives utilizing effective monitoring.

c. Self-assessment methodologies include process observation, face-to-face interviews and inquiries, inspections, standardized DON IRM evaluation checklists, transactional reviews, performance, and other related techniques. These methodologies are based on a process that begins with clearly identifying and articulating command strategic objectives and then ascertaining critical processes and controls required to mitigate inherent risk. Using this information, areas are ranked to ensure the highest priorities are addressed and any risks are included in testing. These high priority and risk areas are identified based on their impact on mission accomplishment, level of difficulty to control, or potentially subject to the greatest risk of breakdown.

d. NETC internal testing for various financial segments control functions will streamline and centralize the audit samples and internal controls testing processes, allowing for targeted testing of specific business segments and control points along with providing analytics across the domain.

e. NETC MAUS provide NETC with an annual certification SOA and NETC HQs AUMs provide NETC with an annual departmental certification statement. In addition, NETC HQs and subordinate commands conduct periodic inspections of command programs to determine compliance, evaluate internal controls, and gauge the effectiveness of their work processes. These programs include civilian timekeeping, government commercial purchase card, government travel charge card, cyber security, operations security, Privacy Act, and many others.

f. Finally, NETC CE Officers conduct CEs of individual programs throughout the year to ensure internal controls are in place and the program is working as intended. NETC direct reporters (echelon 3 commands) conduct in-house CEs and external assessments of their subordinate commands annually.

g. NETC utilizes MW/SD (NETC 5200/4) to identify and document any MWs or SDs and to document and track corrective actions as applicable. MWs and SDs reported to NETC HQs by subordinate MAUs are routed to the applicable NETC HQs subject matter expert for review, assessment, and potential routing to higher authority (as required). If it is determined a

deficiency exists, it will be assigned to the appropriate subject matter expert for review or resolution and tracked until the issue has been resolved.

7. Evaluation Of Results. NETC process owners conduct risk assessments of their operational or administrative work processes and assign a RAC to each. Risks may run from negligible to catastrophic. Based on the identified RAC, NETC process owners will assess the internal control(s) of the process and determine whether they are effective or if they need to review for a possible deficiency.

Enclosure (3)