

FY2017 PUBLIC PORTION of the Report of the Internal Audit Committee of Asha for Education (AfE)

This is the public portion of the second report of the first AfE Internal Audit (IA) committee consisting of Snetu Karania (June 2016- Dec 2018), Meera Sitharam (June 2016 - Dec 2018), Anant Jani (joined Jan 2018, term ends Dec 18).

The 2016 - 2018 BoD includes - Uttaraa Diwan (President), Venkatesh Iyengar (Secretary), Shankar Sadasivam (Treasurer), Swati Sircar (Projects Coordinator), Prasad Pabati (Fundraising Coordinator) and Akshay Bhole (Webmaster).

The [entire report](#) as well as this public portion are available to all AfE volunteers via the wiki at <http://wiki.ashanet.org/display/COORD/Internal+Audit+Committee>

It is unclear at the time of this writing whether the BoD's intent is to publicize *only* the latter portion, and whether the BoD vote applies beyond the FY2016 IA report.

The BoD voted: "I hereby approve of making this portion of the FY2016 report public to external stakeholders" For a record of the BoD vote, see:

<http://wiki.ashanet.org/display/COORD/CoordCall.20180531.Vote.2016+IA+Report>

For the Internal Audit Committee Charge and Full Bank of Questions please see:

[FY 2016 COMPLETE Internal Audit Report -- for AfE volunteers](#)

For the public portion of the above, please see:

[FY 2016 PUBLIC Portion Internal Audit Report – for external stakeholders](#)

The answers **in blue** are from the BoD and the coordination team. Answers **in purple** are findings by the internal audit committee.

Category 1 (Compliance with Laws and Regulations for 501(c)(3) public charities in California with NGO partners in India)

1. Have there been any legal notices served to AfE from any person or authority? **Answer: No.**
2. Is AfE registered to operate and fundraise in all states where it has a chapter, or has solicited funds or more than \$5K this year? **Answer: Yes** If not, which ones and what's being done to remedy? **Answer: N/A** Were all registration renewals handled on time? (Cogency Global - or other similar agency - tracking clean?) **Answer: Yes**
3. Were all donor restrictions met prior to releasing temporarily restricted donations? Have donor agreements, and corresponding restricted assets, if any, been reviewed for compliance? **Answer: Yes**
4. Is there a Donor Privacy Policy? Have any donors requested such a policy? Does the BoD know the identity of all donors? How is donor information protected? **Answer: <http://ashanet.org/guidelines/3/> and <http://ashanet.org/guidelines/5/>
The BOD does not know the identity of all donors, with the exception of any identifying information accompanying the donation (name, email, address, etc.)**
5. Were AfE chapter and/or supported partner activities consistent with the "no substantial

part” test for political lobbying by 501(c)(3) public charities and any analogous tests in India? **Answer: Yes**

6. Were any organizations banned from receiving funds in India (no FCRA when the funds were sent) or by the US (OFAC list) supported by Asha? **Answer: No**
7. Were any donations made to NGO implementation partners under AfE’s name but not fully under the discretion and control of AfE via site-visits and stewardship? **Answer: No**

Category 2 (Accounting, Tax and External Audit Compliance)

26. Has the independence of the external auditor been ascertained (COI, auditor rotation norms etc.)? **Answer: Zero COI between AWT, BOD, IA and the EA. IA agrees. We are also still well within auditor rotation norms. IA suggested that an auditor rotation was due and found an alternative qualified auditor at a lower cost, but the BoD decided against the switch for understandable and clearly documented reasons.**
27. Have the competence, remuneration of the external auditor been vetted at time of engagement? **Answer: This is collectively the responsibility of IA and BOD team. BOD team believes there was a robust discussion to vet this. IA agrees.**