



March 27, 2019

Mr. Raimundo Carreiro
Chair of the Professional Standards Committee
INTOSAI

Dear Mr. Carreiro:

The International Consortium of Government Financial Managers (ICGFM) would like to thank you for the opportunity to provide comment on the *GUID 5XXX – Guidance on the audit of the use and development of key national indicators*. We have read the prepared documents and held discussions among our constituents.

Overall, the guide is thorough and covers the various aspects of a performance audit of key national indicators. The inclusion of the maturity models are helpful in providing a mechanism to analyze the key national indicators across programmes, organizations, and governments. It also allows for future assessments across countries.

We offer the following specific items for your consideration:

1. Include some example audit objectives and subobjectives for auditing use and development separately. It may assist auditors establish the appropriate focus for the audits.
2. Under Section 66, the opening paragraph needs additional clarity. We were unsure what “such structuring” was. Perhaps some refinement would allow for greater understanding from the start.
3. Include greater use of examples to provide an anchor for the concepts being discussed.

Again, thank you for the opportunity to provide comments to the exposure draft.

Sincerely yours,

Charbet Duckett
Chair Ad-hoc Committee on International Auditing Standards, ICGFM