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New Year, New COSO

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If you haven't already transitioned to the new COSO 2013 Framework, now is the time! Previously, guidance was somewhat vague, stating that the transition date was December 15, 2014, but that the SEC would defer to the COSO board in regards to the transition timing. This led to many companies choosing to delay the transition to the new Framework until 2015.

According to a Compliance Week article titled "More Hints on Putting New COSO to Work," at the most recent annual national conference for the American Institute of Certified Public Accountants, the SEC Deputy Chief Accountant, Nili Shah, addressed the topic. He stated that "At least for the 2014 reporting season, we will not object to companies that continue to use the 1992 Framework, but as we move further from the end of COSO's transition period, both investors and we may continue to question continued use of the 1992 Framework."

Auditors are cautioned to look for strong business reasons for not adopting the new framework, going forward. Being too busy with other projects or not being able to comply with the new Framework are not acceptable reasons. It is of utmost importance that during the transition period, companies must disclose in the financial statements which Framework they are using.

Does your company still need to make the leap to the 2013 Framework? If so, Schneider Downs has professionals that have significant experience with the new Framework and can help guide you through the transition. We can help you map your current controls to the new COSO principles with our detailed mapping tools that we have developed. For more information on how Schneider Downs can assist you or your company with implementing the COSO 2013 Framework, contact Jim Yard at 412-697-5345 or jyard@schneiderdowns.com.

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