Long Form Audit Report (LFAR)



Introduction



Long Form Audit Report (LFAR) is a questionnaire is prepared by RBI in consultation with stakeholders including ICAI, which an auditor has to answer



It was introduced by RBI in 1985 and has been revised in 1992-93, 2002 and latest on 05.09.2020



LFAR includes questionnaires for specialized branches also-

For branches dealing in *foreign exchange transactions* For branches dealing in *very large advances* For branches *dealing in recovery of NPA* For branches dealing in *clearing house operations (service branches)* AsperRBIcircularNo.DOS.CO.PPG./SEC.01/11.01.005/2020-21dated05.09.2020on revision of Long Form Audit Report (LFAR).

1. Need for Revision : large scale changes in the size, complexities, business model and risks in the banking operations, a review of the LFAR format was undertaken and it has been decided to make the following changes.



2. The format of LFAR, as mentioned below, have been revised:

Annex I for Statutory Central Auditors (SCA)

<u>Annex II</u> for Branch Auditors

An Appendix as part of Annex II for the specialized branches and

<u>Annex III</u> on Large / Irregular / Critical accounts for branch auditors.

3. Applicability : From 2020-21 and onwards.



Objectives of LFAR

Internal Control Report

Focus **not only on advances** but also on operational areas in the branch

Covers operational Risk extensively

A tool for early warning signals

I. ASSETS 1. Cash

Point No.	Revised Clause		Comments/Views
1 (b)	Cash balances at the branch/ATMs been	-	ATM attached with the branch only
	checked at periodic intervals as per the	-	ATM includes CDM (Cash Deposit
	procedure of the bank?		Machine)
1 (c) (ii)	Does the figure of the balance in the branch	-	To verify system generated ATM balance
	books in respect of cash with its ATM(s) tally		report as of year end and ATM cash Tally
	with the amounts of balances with the		report
	respective ATMs, based on the year end	-	To report on reconciliation with GL
	scrolls generated by the ATMs ? If there is		balance
	any difference, same should be reported		

2. Balance with RBI, SBI and other banks (For branches with Treasury Operations)

Point No	Revised Clause	Comments/Views
2 (b) (iii)	Other credit and debit entries originated in the statements provided by RBI/other banks, remaining un-responded for more than 15 days	through out the year
2 (b) (iv)	Branch maintains an account with RBI ? If yes, Entries originated prior to, but communicated / recorded after the year end in relation to currency chest operations at the branch/other link branches, involving deposits into/withdrawals from the currency chest attached to such branches	 Review the reconciliation items compelling MoCs and special attention items

3. Money at Call and Short Notice

Not observed in branches (Applicable to branch dealing with treasury)

4. Investments (for branches outside India)

Not Applicable as SBAs are appointed locally for Branches outside India

5. Advances

General Instructions :

(i) The answers to the following questions may be based on the auditor's examination of all large advances.

• For this purpose, large advances are those in respect of which the outstanding amount is in excess of 10% of outstanding aggregate balance of fund based and non-fund based advances of the branch or Rs.10 crores, whichever is less.

Care- For all accounts above the threshold, the transaction audit/account specific details to be seen and commented, whereas below the threshold, the process needs to be checked and commented upon. Comments of the branch auditor on advances with significant adverse features, which might need the attention of the management / Statutory Central Auditors, should be appended to the LFAR.

5 (a) List of accounts examined for audit (as per new LFAR format)

Account No.	Account Name	Balance as at year end - Funded	Balance as at year end – Non - funded	Total
Total		А	В	C = A + B
Total Outstanding of the branch		Х	Y	Z = X + Y
% Examined		A as % of X	B as % of Y	C as % of Z

(b) Credit Appraisal

Point No.	Revised Clause	Comments/Views
5 (b) (i)	What, in your opinion, are the major shortcomings in credit appraisal etc.	 To report on the basis of review of appraisal reports of loan sanctioned / reviewed / renewed Special attention to restructuring / fresh loans / ad-hoc loans in view of COVID packages by RBI. Compliance of suitable circulars to be ensured
5 (b) (ii)	Any cases of quick mortality in accounts? Details of such accounts may be provided in following manner:- Account No. Account Name Balance as at year end	 To find out such accounts from MIS reports / any audit reports of branch No threshold limit for reporting of quick mortality MRL if no such cases

Revised Clause	Comments/Views		
Whether in borrower accounts the applicable interest rate is correctly fed into the system ?	 Confirm that the interest rate as per the sanction letter has been fed into the system. Maker checker – changes made to master To verify on test check basis wherever there is a change in rate is correctly fed into the system 		
reviewed periodically as per the guidelines applicable to floating rate loans linked to MCLR / EBLR	 this regard To check applicable MCLR / EBLR (External 		
Have you come across cases of frequent renewal / rollover of short-term loans?	 Timely and comprehensive review/renewal of credit facilities RBI latest notification dated 21.08.2020 		
	Whether in borrower accounts the applicable interest rate is correctly fed into the system ? Whether the interest rate is reviewed periodically as per the guidelines applicable to floating rate loans linked to MCLR / EBLR (External Benchmark Lending Rate)? Have you come across cases of frequent renewal / rollover of		

Point No.	Revised Clause	Comments/Views
5 (b) (vi)	Whether correct and valid credit rating , if available, of the credit facilities of bank's borrowers from RBI accredited Credit Rating Agencies has been fed into the system?	External Credit Rating as per Bank's policy (Credit rating framework)
5 (c) (iii)	Did the bank provide loans to companies for buy-back of shares / securities ?	 Enquire with branch, Review the sample selected and to verify end use of funds. Certificate to that extent from borrower. To report all loan sanctioned for buy-back of shares/securities

Point No.	Revised Clause	Comments/Views
5 (e) (ii) (b)	Is the DP properly computed?	 Verify stock / book debt statement submitted Review latest stock audit report In case of consortium advance, DP should be determined by lead bank & circulated to other member banks
5 (e) (ii) (c)	Whether the latest audited financial statements are obtained for accounts reviewed or renewed ?	 To obtain list of non-corporate borrowers enjoying facilities in excess of that set by bank To report where audited financials are not obtained by the branch
5 (e) (iii) (c)	 Details of: ➤ cases where stock audit was required but was not conducted ➤ where stock audit was conducted but no action was taken on adverse features 	 To refer guidelines issued by HO and to confirm compliance thereof Adverse features should be duly factored in review/renew notes

Point No.	Revised Clause	Comments/Views
5 (e) (iv)	Indicate the cases of advances to non- corporate entities with limits beyond that is set by the bank where the branch has not obtained the duly audited accounts of borrowers.	- Verify whether Audited Financial Statement obtained for 31.03.2022 and comment
5 (e) (v)	Does the branch have on its record, a due diligence report in the form and manner required by the Reserve Bank of India in respect of advances under consortium and multiple banking arrangements. If yes, list of accounts where such certificate/report is not obtained or not available on record.	 consortium Verify due diligence report. If the branch is not lead bank, obtain the copy of diligence report Report cases where the same is not obtained

Point No.	Revised Clause		Comments/Views
5 (e) (vi)	Whether there is a substantial deterioration in value of security during financial year as per latest valuation report in comparison with earlier valuation report on record?		To compare valuation reports To give MOC if there is deterioration
5 (e) (viii)	Whether the branch has any red-flagged account? If yes, whether any deviations were observed related to compliance of bank's policy related with Red Flag Accounts?	-	To report red-flagged accounts & action taken Review bank policy in this regard Report deviation observed

Point No.	Revised Clause	Comments/Views
5 (e) (ix)	Comment on adverse features considered significant in top 5 standard large advances	 Provide instances of deviation from policy of bank relating to sanctioning of advances
		- To comment related to any adverse features
		which in auditor's opinion need management attention

Point No.	Revised Clause	Comments/Views
5 (f) (i) (a)	Branch identified and classified advances into standard / substandard / doubtful / loss assets through the computer system, without manual intervention?	 To verify software used for classification of advances Banks to fully automized income recognition / assets classification and provisioning process latest by 30th June, 2021 as per RBI circular dated 14.09.2020
5 (f) (i) (c)	classifying the account into SMA-0, SMA-1, and SMA-2. Whether Auditor disagrees with the branch classification, details with reasons to be given	 Even within standard advances, if auditor disagrees it is to be reported here

Point No.	Revised Clause		Comments/Views
5 (f) (i) (d)	Whether required changes have been incorporated/ suggested in the Memorandum of Changes	-	To confirm here that the MOC which has the financial implications and/or change in asset classification is suggested by the auditor
5 (f) (i) (e)	List the accounts (with outstanding in excess of Rs. 10 crore) which have either been downgraded or upgraded during the year and the reason thereof.		Downgraded & Upgraded both the information to be reported here Upgrading would need greater audit check for its accuracy

Point No.	Revised Clause	Comments/Views
5 (f) (i) (f)	Whether RBI guidelines on income recognition and provisioning have been followed.?	 To confirm compliance of IRAC norms complied in this regard To report deviation, if any
5 (f) (ii) (a)	Whether the branch has reported account restructured or rephased during the year to Controlling Authority of the bank?	
5 (f) (ii) (b)	Whether the RBI guidelines for restructuring on all such cases have been followed.	 Review various guidelines of RBI and HO with respect to restructuring including special packages of RBI for restructuring permitted due to COVID related stress

Point No.	Revised Clause	Comments/Views
5 (f) (ii) (c)	Whether the branch complies with the regulatory stance for resolution of stressed assets, including the compliance with board approved policies in this regard, tracking/reporting of defaults for resolution purposes among others?	 To enquire about account that has exposure of Rs. 2000 Crore and above If yes, ensure prompt reporting under CRILC. To report in case such account is under SMA category for 180 days continuously
5 (f) (iii) (a)	Whether the upgradations in non- performing advances is in line with the norms of Reserve Bank of India	
5 (f) (iii) (b)	Where the auditor disagree with upgradation of accounts? If yes, give reasons thereof.	

Point No.	Revised Clause	Comments/Views	
5 (f) (v)	Whether there are any accounts wherein process under IBC is mandated but not initiated by the branch? Whether there are any borrowers at the branch against whom the process of IBC is initiated by any of the creditors including bank? If yes, provide the list of such accounts and comment on the adequacy of provision made thereto?	 forbearance was permitted by RBI To identify the accounts wherein the IBC procision is initiated To comment on adequacy of provision on taccounts 	
5 (f) (vi)	 a) Have appropriate claims for credit guarantee (ECGC and others), if any, been duly lodged and settled? b) Give details of claims rejected? (As per the given table) 	Particulars Number Amount Claim at the boginning of Image: Claim at the boginning of the boginnig of the bogi	

Point No.	Revised Clause	Comm	ents/Views	
	c) Whether the rejection is appropriately considered while determining the	Particulars	Number	Amount
provisioning requirements.	Further claim lodged during the year			
		Total A		
		Amounts representing		
		 (i) Claims accepted/settle d (ii) Claims rejected 		
		Total B		
		Balance as at year end (A-B)		

Point No.	Revised Clause	Comments/Views
5 (f) (ix)	Is the branch prompt in ensuring execution of decrees obtained for recovery from the defaulting borrowers? Give Age-wise analysis of decrees obtained and pending execution.	 Review the process followed by branch for execution of decrees and comment, if it is in line with guidelines of HO
5 (f) (x)	Whether in the cases concluded the recoveries have been properly appropriated against the principal/interest as per the policy of the bank?	appropriation of recoveries

Point No.	Revised Clause	Comments/Views					
5 (g) (i)	List of borrowers with details of LCs devolved or guarantees invoked during the year.	Sr. No.	Invoca tion Date	Party Name	Benefi ciary Name	Amt	Recov ery Date
5 (g) (ii)	List of borrowers where the LCs devolved or guarantees invoked but not paid with amount thereof.	Sr. No.	Invoca tion Date	Party Name	Benefi ciary Name	Amt	Reaso n for non paym ent

Point No.	Revised Clause	Comments/Views
5 (g) (iii)	List of instances where interchangeability between fund based and non-fund-based facilities was allowed subsequent to devolvement of LC / invocation of BG.	AFTER devolvement of LC/Invocation of BG

II. Liabilities 1. Deposits

Point No.	Revised Clause	Comments/Views
1 (c)	Whether the scheme of automatic renewal of deposits applied to FCNR(B) deposits? Where such deposits have been renewed, report whether the branch has satisfied itself as to the 'non- resident status' of the depositor and whether the renewal is made as per the applicable receipts / soft copy have been dispatched.	 accounts & system parameters for automatic renewal marked in FCNR(B) accounts Check process of obtention of documents & verification of process of continuation of account holder in non-residential status Check bank policy of printing & dispatch of original receipt & control over them
1 (d)	Is the branch complying with the regulations on minimum balance requirement and levy of charges on non- maintenance of minimum balance in individual savings accounts?	consumer for non-maintenance of the same

III. Profit and Loss Account

Point No.	Revised Clause	Comments/Views
(a)	Has the test checking of interest / discount / commission / fees etc. revealed excess / short credit of a material amount? If so, give details thereof.	
(b)	Has the branch complied with the Income Recognition norms prescribed by RBI? (The Auditor may refer to the instructions of the controlling authorities of the bank regarding charging of interest on non- performing assets).	 Income of NPAs to be recognized on realization basis. To commont on the basis of cample checking.
(c)	Has the test check of interest on deposits revealed any excess / short debit of material amount? If so, give details thereof.	

III. Profit and Loss Account

Point	No.	Revised Clause	Comments/Views
(d)		Does the bank have a system of estimating and providing interest accrued on overdue / matured / unpaid / unclaimed term deposits including in respect of decreased depositors?	

1. Gold/Bullion / Security Items

Point No	· Revised Clause	Comments/Views
(a)	Does the system ensure that gold/bullion is in effective joint custody of two or more officials, as per the instructions of the controlling authorities of the bank?	 To take details of name & designation of officials who have joint custody of the same. To verify as per system laid down To report exceptions, if any
(b)	Does the branch maintain adequate records for receipt , issues and balances of gold/bullion and updated regularly? Does the periodic verification reveal any excess/shortage of stocks as compared to book records and if any discrepancies observed have been promptly reported to controlling authorities of the bank?	—

1. Gold/Bullion / Security Items

Point No.	Revised Clause	Comments/Views
(c)	Does the system of the Bank ensure adequate internal control over issue and custody of security items (Term Deposit Receipts, Drafts, Pay Orders, Cheque Books, Travelers' Cheques, Gift Cheques, etc.)? Whether the system is being followed by the branch? Have you come across cases of missing/lost items?	 internal control Carry physical verification of security items including stamps Review whether last security items have been promptly reported to Controlling Authority

Point No.	Revised Clause	Comments/Views
(a)	Whether there are any software / systems (manual or otherwise) used at the branch which are not integrated with the CBS? If yes, give details thereof.	 Numerous software implemented by the banks. Review software which has an impact on financial transactions, reporting or any core activity which have not been integrated To check whether system link SWIFT system, Structured financial messaging system, system for lockers etc. have been integrated with CBS
(b) (i)	In case the branch has been subjected to IS Audit whether there are any adverse features reported and have a direct or indirect bearing on the branch accounts and are pending compliance? If yes, give details.	 To obtain confirmation from branch in this regard To review report, if IS audit is carried out Necessary compliances / explanations, wherever required, should be obtained on issues reported in IS Audit

Point No.	Revised Clause	Comments/Views
(b) (ii)	Whether branch is generating and verifying exception reports at the periodicity as prescribed by the bank	
(b) (iii)	Whether the system of bank warrants expeditious compliance of daily exception reports and whether there are any major observations pending such compliance at the year end.	be generated, reviewed and commented upon on daily basis have been complied with.

Point No.	Revised Clause	Comments/Views
(b) (iv)	Whether the bank has laid down procedures for manual intervention to system generated data and proper authentication of the related transactions arising there from along with proper audit trail of manual intervention has been obtained.	be followed when system generated data is manually altered.

Point No.	Revised Clause	Comments/Views
(b) (v)	Furnish your comments on data integrity (including data entry, checking correctness / integrity of data, no back ended strategies etc.) which is used for MIS at HO / CO level.	Administration level

4. Frauds

	Point No.	Revised Clause	Comments/Views
	(ii)	Whether any suspected or likely fraud cases are reported by branch to higher office during the year? If yes, provide the details thereof related to status of investigation.	 Check the list of frauds detected at branch. Check whether the same is reported to higher ups. Obtain details related to status of investigation
	(iii)	In respect of fraud, based on your overall observation, please provide your comments on the potential risk areas which might lead to perpetuation of fraud.	Defaulters".
	(iv)	Whether the system of Early Warning Framework is working effectively and as required, the early warning signals form the basis for classifying an account as RFA.	 Refer Bank's policy in this regard Test check few of the EWS which are fetched by the system. E.g. Under / over insurance of assets charged, Heavy cash withdrawals in CC accounts

6. Management Information System

Point No.	Revised Clause	Comments/Views
(a)	Whether the branch has the proper systems and procedures to ensure data integrity relating to all data inputs which are to be used for MIS at corporate office level and for supervisory reporting purposes. Have you come across any instances where data integrity was compromised?	 Verify the MIS system available at branch. Check reports and contents of the same and comment about system and procedures. On a test check basis input data from source documents and comment appropriately

7. Miscellaneous

Point No.	Revised Clause	Comments/Views
(a)	In framing your audit report/LFAR, have you considered the major adverse comments arising out of the latest reports.	i. Previous year's Branch Audit Report / LFAR;

Thank You!

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