

AUDIT OF BANKS

Question 1

Your firm has been appointed as Central Statutory Auditors of a Nationalised Bank. The Bank follows financial year as accounting year. State your views on the following issues which were brought to your notice by your Audit Manager:

- (a) *In computing the aggregate of funded and non-funded exposure of a constituent for purpose of assigning risk weight in regard to capital adequacy, the bank "Netted off" the credit balance of Rs.10 lakhs in their Current Account against the total exposure of Rs.1 crore.*
- (b) *The bank has recognised on accrual basis income from dividends on securities and Units of Mutual Funds held by it as at the end of financial year. The dividends on securities and Units of Mutual Funds were declared after the end of financial year.*
- (c) *The bank is a consortium member of Cash Credit Facilities of Rs.50 crores to X Ltd Bank's own share is Rs.10 crores only. During the last two quarters against a debit of Rs.1.75 crores towards interest the credits in X Ltd's account are to the tune of Rs.1.25 crores only. Based on the certificate of lead bank, the bank has classified the account of X Ltd as performing.*
- (d) *In case of all such advances which have been classified as non-performing for the first time during the current financial year, only the last date of the financial year has been reckoned as the date of account becoming non-performing.*

Answer

- (a) Section 24 mandates that a scheduled bank, in addition to the average daily balance required to be maintained under Section 42 of the Reserve Bank of India Act, 1934 every other banking company, in addition to the cash reserve required to be maintained under section 18, shall maintain in India, assets of the value which shall not be less than such percentage not exceeding forty percent of the total of its demand and time liabilities in India as on the last Friday of the second preceding fortnight, in such form and manner as the RBI may by notification in the Official Gazette, specify from time to time.

Section 25 requires that the assets in India of every banking company at the close of business on the last Friday of every quarter or if that day is a public holiday, at the close of the preceding working day, shall not be less than 75% of its demand and time liabilities in India.

- (b) It is not a prudent practice to treat dividend on shares of corporate bodies and units of mutual funds as income unless these are actually received. Accordingly, income from dividend on shares of corporate bodies and units of mutual funds should be booked on cash basis. In respect of income from government securities and bonds and debentures of corporate bodies, where interest rates on these instruments are pre-determined, income could be booked on accrual basis, provided interest is serviced regularly and as such is not in arrears. It was further, however, clarified that banks may book income on accrual basis on securities of corporate bodies/public sector undertakings in respect of which the payment of interest and repayment of principal have been guaranteed by the central government or a State government. Banks may book income from dividend on shares of corporate bodies on accrual basis, provided dividend on the shares has been declared by the corporate body in its annual general meeting and the owner's right to receive payment is established. This is also in accordance with AS 9 as well. In the instant case, the recognition of income by the bank on accrual basis is not in order
- (c) The bank is a consortium member of cash credit facilities of Rs.50 crores to X Ltd. Bank's own share is Rs.10 crores only. During the last two quarters against a debit of Rs.1.75 crores towards interest, the credits in X Ltd's account are to the tune of Rs.1.25 crores only. Sometimes, several banks form a group (the 'consortium') under the leadership of a 'lead bank' to make advance to a large customer on same conditions and security with proportionate rights. In such cases, each bank may classify the advance given by it according to its own experience of recovery and other factors. Since in the last two quarters, the amount remains outstanding and, thus, interest amount should be reversed. This is despite the certificate of lead bank to classify that the account as performing. Accordingly, the amount should be shown as non-performing asset.
- (d) It is wrong to take the Balance Sheet date for purposes of classification. In this context, it is important to note the concept of past due. An amount should be considered as past due when it remains outstanding for 30 days beyond due date. For example, if any SSI loan amount, the repayment of term loan installment falls due for payment on December 31 and is not paid; the amount would become past due if it remains unpaid for 30 days beyond that date. In case of terms loans, if interest or installment of principal is in arrears for any two quarters out of four quarters although default may not be continuously for two quarters during the year by applying past due test, it should be classified as non-performing asset and from that date provision should be made. In the case of other advances, outstanding in the last two quarters would be enough to classify the amount as such non-performing asset if no transaction appears in the last two quarters.

As per RBI Circular dated January 29, 1997, if the account of the borrowers have been regularised before the balance sheet date by repayment of overdue amounts through genuine sources and not by sanction of additional facilities, the account need not be treated as NP A in spite of payment of interest and installment were in arrear for two quarters. Bank should, however, ensure that the account remains in order subsequently and a solitary credit entry made in the account on or before the balance sheet date which

extinguished the overdue amount of interest or instalment of principal is not reckoned as the sole criterion for treating the account as a standard asset.

It has been further clarified that in respect of accounts where there are potential threats of recovery on account of erosion in the value of security or non-availability of security and existence of other factors such as frauds committed by borrowers, it will not be prudent for banks to classify them first as sub-standard and then as doubtful after expiry of two years from the date of account has become NPA. It should be straight way classified as doubtful asset or loss asset, as appropriate, irrespective of the period for which it has remained as NPA.

Question 2

What is the income recognised in the case of 'non-performing' assets of bank?

Answer**Income Recognition**

The banks may book income in the following manner: as per the circular issued by RBI DBOD No. BP. BC.20/21.04.048/2008- 09 dated July 1, 2008.

- (i) Interest on advances against term deposits, NSCs, IVPs, KVPs and Life policies may be taken to income account on the due date, provided adequate margin is available in the accounts.
- (ii) Fees and commissions earned by the banks as a result of renegotiations or rescheduling of outstanding debts should be recognised on an accrual basis over the period of time covered by the renegotiated or rescheduled extension of credit.
- (iii) If Government guaranteed advances become NPA, the interest on such advances should not be taken to income account unless the interest has been realised.

Question 3

Describe the procedure for verification of the following balances appearing in the account books of a bank:

- (i) *Drafts paid without advice*
- (ii) *Branch adjustment account*

Answer

- (i) **Drafts paid without advice:** This balance is in the nature of a suspense account in as much as it represents payments made on account of drafts issued by other branches but for which the relevant advice from those branches have not been received. It is, therefore, most important to examine the system of internal control operating in the bank in this respect. The testing of the internal control system has to be made mainly with regard to the following:

Advanced Auditing and Professional Ethics

- (i) the system of verifying the authenticity of the draft by reference to specimen signature of the signing authority and the *prima facie* correctness and completeness of the draft in all respects;
- (ii) the system of co-relating drafts paid with advices subsequently received; and
- (iii) the system of sending reminders where advices are not received within a reasonable time and the recording of reasons for their non receipt.

The composition of the balances appearing in this account should be verified with particular reference to any long outstanding items. The auditor should also verify whether the items appearing in this account have been subsequently cleared on receipt of the relevant advices. It would also be useful to have on record the names and addresses of the payees of such drafts. The auditor may also seek confirmation of transactions relating to such outstanding cases.

- (ii) **Branch Adjustment Account:** In the final balance sheet of the bank, this balance represents the difference between inter branch debits and credits and should normally comprise items which are in transit as on the closing date. This account is the one which is most commonly used by unscrupulous persons in committing a fraud. The verification of this account is, therefore, of great importance. The procedure for verification is as follows:

- (i) See that all branch accounts are periodically reconciled.
- (ii) Check all adjustments in the account and ensure that the adjustments are done properly and supported by adequate documentary evidence as to its validity.
- (iii) Verify that reversal entries are made under proper authority and after due explanation and evidence.

Question 4

As a branch auditor of a nationalised bank, how would you verify the following?

- (i) *Advances to DOT COM Companies.*
- (ii) *Balances in account of a bank situated in a foreign country.*

Answer

(i) **Advances to DOT COM Companies**

- (i) Evaluate the efficacy of internal control system in general to ascertain whether an advance is made only after satisfying itself as to the credit worthiness of the borrower and after obtaining sanction from the appropriate authorities of the bank. The sanction for an advance must specify, among other things, the limit of borrowing, nature of security, margin to be kept, interest, terms of repayment, etc. Also see that all the necessary documents, e.g., agreements, demand promissory

notes, letters of hypothecation, etc. have been executed by the parties before advances are made.

- (ii) Examine loan documents such as certificate of commencement of business (in the case of public limited companies), resolution of board of directors, and resolution of shareholders (in cases covered by Section 293(1)(d) of the Companies Act, 1956).
- (iii) Verify the business plan of the company especially where the revenue model is in place. Verify whether the company depends only on outside funding or can self generate funds.
- (iv) Examine in case the security is in the form of mortgage, apart from mortgage deed (in the case of English Mortgage) or letter of intent to create mortgage (in the case of Equitable Mortgage), the evidence of registration of the charge with the Registrar of Companies.
- (v) Review the operation of advance account to see that limit is not generally exceeded; that the account is not becoming stagnant; that the customer is not drawing against deposits which are not free from lien; that the account is not window-dressed by running down overdrafts at the year end and again drawing further advances in the new year, etc.
- (vi) Examine whether there is a healthy turnover in the account. It should be seen that the frequency and the amounts of credits in the account are commensurate with the sanctioned limit and the nature and volume of business of the borrower. Any unusual items in the account should be carefully examined by the auditor. If the auditor's review indicates any unhealthy trends, the account should be further examined. The auditor's examination should also cover transactions in the post-balance sheet date period. Large transactions in major accounts particularly as at the year-end may be looked into to identify any irregularities in these accounts.
- (vii) Review periodic statements, cash flow statements, latest financial statements, etc. to assess the recoverability of advances.
- (viii) Verify whether the advance is secured and determine whether the security is legally enforceable, i.e., whether the necessary legal formalities regarding documentation, registration, etc., have been complied with; whether the security is in the effective control of the bank; and to what extent the value of the security, assessed realistically, covers the amount outstanding in the advance.
- (ix) Ensure that proper provisioning norms have been applied in view of non-observance of terms, coupled with irregular payment of interest and default in repayment of instalments, if any.

(ii) Balances in Account of a Bank situated in a Foreign Country

- (i) Verify the ledger balances in each account with reference to the bank confirmation certificates and reconciliation statements as at the year-end.

- (ii) Review the reconciliation statements and pay particular attention to the following.
 - (1) Examine that no debit for charges or credit for interest is outstanding and all the items which ought to have been taken to revenue for the year have been so taken. This should be particularly observed when the bills collected, etc., are credited with net amount and entries for commission, etc. are not made separately in the statement of account.
 - (2) Examine that no cheque sent or received in clearing is outstanding. As per the practice prevalent among banks, any cheques returned unpaid are accounted for on the same day on which they were sent in clearing or on the following day.
 - (3) Examine that all bills or outstanding cheques sent for collection and outstanding as on the closing date have been credited subsequently.
- (iii) Examine the large transactions in inter-bank accounts, particularly towards the year-end, to ensure that no transactions have been put through for window-dressing.
- (iv) Check original deposit receipts in respect of balances in deposit accounts in addition to confirmation certificates obtained from banks in respect of outstanding deposits.
- (v) Check whether these balances are converted into the Indian currency at the exchange rates prevailing on the balance sheet date and ensure compliance with AS 11 on "Accounting for the Effects of Changes in Foreign Exchange Rates".

Question 5

Describe the audit procedures to be followed by a Statutory Auditor of a bank for audit of contingent liabilities.

Answer

Verification of Contingent Liabilities: In respect of contingent liabilities, the auditor is primarily concerned with seeking reasonable assurance that all contingent liabilities are identified and properly valued. To this end, the auditor should, generally follow the audit procedures given below:

- (i) the auditor should ensure that there exists a system whereby the non fund based facilities or additional/*ad hoc* credit facilities to parties are extended only to their regular constituents, etc.
- (ii) Ascertain whether there are adequate internal controls to ensure that transactions giving rise to contingent liabilities are executed only by persons authorised to do so and in accordance with the laid down procedures.
- (iii) The auditor should also ensure that in case of LCs for import of goods, as required by the abovementioned Master Circular on guarantees and co-acceptances, the payment to the

overseas suppliers is made on the basis of shipping documents and after ensuring that the said documents are in strict conformity with the terms of LCs.

- (iv) Ascertain whether the accounting system of the bank provides for maintenance of adequate records in respect of such obligations and whether the internal controls ensure that contingent liabilities are properly identified and recorded.
- (v) Performs substantive audit tests to establish the completeness of the recorded obligations. Such tests include confirmation procedures as well as examination of relevant records in appropriate cases.
- (vi) Review the reasonableness of the year-end amount of contingent liabilities in the light of previous experience and knowledge of the current year's activities.
- (vii) Review whether comfort letters issued by the bank has been considered for disclosure of contingent liabilities.
- (viii) Obtain representation from the management that
 - (a) all contingent liabilities have been disclosed;
 - (b) the disclosed contingent liabilities do not include any contingencies which are likely to result in a loss/ expense and which, therefore, require creation of a provision in the financial statements;
 - (c) the estimated amounts of financial effect of the contingent liabilities are based on the best estimates in terms of Accounting Standard 29, including any possibility of any reimbursement;
 - (d) in case of guarantees issued on behalf of the bank's directors, the bank has taken appropriate steps to ensure that adequate and effective arrangements have been made so that the commitments would be met out of the party's own resources and that the bank will not be called upon to grant any loan or advances to meet the liability consequent upon the invocation of the said guarantee(s) and that no violation of section 20 of the Banking Regulations Act, 1949 has arisen on account of such guarantee; and
 - (e) such contingent liabilities which have not been disclosed on account of the fact that the possibility of their outcome is remote, include the management's justification for reaching such a decision in respect of those contingent liabilities.
- (ix) The auditor should also examine whether the bank has given any guarantees in respect of any trade credit (buyer's credit or seller's credit). The period of guarantees is co-terminus with the period of credit reckoned from the date of shipment.
- (x) Verify whether bank has extended any non-fund facility or additional/*ad hoc* credit facilities to other than its regular customers. In such cases, auditor should ensure concurrence of existing bankers of such borrowers and enquire regarding financial position of those customers.

Question 6

Discuss the scope of “concurrent audit” in the banks.

Answer

Scope of concurrent audit

Concurrent audit is an examination which is contemporaneous with the occurrence of transactions or is carried out as near thereto as possible. It attempts to shorten the interval between a transaction and its examination by an independent person not involved in its documentation. There is an emphasis in favour of substantive checking in key areas rather than test checking. This audit is essentially a management process integral to the establishment of sound internal accounting functions and effective controls and setting the tone for a vigilance internal audit to preclude the incidence of serious errors and fraudulent manipulations.

A concurrent auditor may not sit in judgement of the decisions taken by a branch manager or an authorised official. This is beyond the scope of concurrent audit. However, the audit will necessarily have to see whether the transactions or decisions are within the policy parameters laid down by the Head Office, they do not violate the instructions or policy prescriptions of the RBI, and that they are within the delegated authority.

In very large branches, which have different divisions dealing with specific activities, concurrent audit is a means to the incharge of the branch to ensure on an on going basis that the different divisions function within laid-down parameters and procedures.

Coverage

- (i) The Departments/Divisions at the Head Office dealing with Treasury functions viz investments, funds management including inter-bank borrowings bill rediscount and foreign exchange business are to be subjected to concurrent audit. In addition, all branch offices, undertaking such business and dealing rooms have to be subjected to continuous audit.
- (ii) The coverage of branches should ensure that concurrent audit covers:
 - (a) Branches whose total credit and other risk exposures aggregate to not less than 50% of the total credit and other risk exposures of the bank; and
 - (b) Branches whose aggregate deposits cover not less than 50% of the aggregate deposits of the Bank.
- (iii) To achieve these twin criteria it is suggested that branches may be listed according to credit and other risk exposures and selected in the descending order of exposures to achieve a 50% coverage. If the deposits of these branches do not aggregate to 50% of the Bank's deposits, additional branches in descending order of deposits may be added to achieve a 50% coverage of the branches.

- (iv) While complying with the above parameters, it is necessary to ensure that the coverage encompasses:
- ◆ exceptionally large branches
 - ◆ very large and large branches
 - ◆ special branches handling foreign exchange business, merchant banking business, large corporate wholesale banking business and forex dealing room operations
 - ◆ large problem branches rated as poor/very poor
 - ◆ Head Office department dealing with treasury/funds management and handling investment portfolio
 - ◆ any other branches or departments where in the opinion of the Bank concurrent audit is desirable.
- (v) Branches subjected to concurrent audit should not normally be included for revenue/income audit.

Types of activities to be covered

- (i) The main role of concurrent audit is to supplement the efforts of the bank in carrying out simultaneous internal check of the transactions and other verifications and compliance with the procedures laid down.
- (ii) The scope of concurrent audit should be wide enough to cover certain fraud-prone areas like handling of cash, deposits, safe custody of securities, investments, overdue bills, exercise of discretionary powers, sundry and suspense accounts, inter-branch reconciliation, clearing differences, foreign exchange business including Nostro accounts, off-balance sheet items like letters of credit and guarantee, treasury functions and credit-card business.
- (iii) The detailed scope of the concurrent audit should be clearly and uniformly determined for the Bank as a whole by the Bank's Inspector and Audit Department in consultation with the Bank's Audit Committee of the Board of Directors (ACB).
- (iv) In determining the scope, importance should be given to checking high-risk transactions having large financial implications as opposed to transactions involving small amounts.
- (v) While the detailed scope of the concurrent audit may be determined and approved by the ACB.

Question 7

As statutory central auditors of a Nationalized bank, what special points are to be borne in mind in the audit of compliance with "Statutory Liquidity Ratio" (SLR) requirements?

Answer

As per the Master Circular-on Statutory Liquidity Ratio issue by RBI No. RBI/2010-11/70.DBOD.No.Ret.BC.23/12.01.001/2010-11 and Consequent upon amendment to the Section 24 of the Banking Regulation Act, 1949 through the Banking Regulation (Amendment) Act, 2007 replacing the Regulation (Amendment) Ordinance, 2007, effective January 23, 2007, the Reserve Bank can prescribe the Statutory Liquidity Ratio (SLR) for SCB in specified assets. The value of such assets of a SCB shall not be less than such percentage not exceeding 40 per cent of its total demand and time liabilities in India as on the last Friday of the second preceding fortnight as the Reserve Bank may, by notification in the Official Gazette, specify from time to time.

Reserve Bank has decided that all SCBs shall continue to maintain a uniform SLR of 25 per cent on their total net demand and time liabilities (NDTL) with effect from the fortnight beginning November 7, 2009, valued in accordance with the method of valuation specified by the Reserve Bank of India from time to time:

- (a) in cash, or
- (b) in gold valued at a price not exceeding the current market price,
or
- (c) in unencumbered investment in the following instruments which will be referred to as "statutory liquidity ratio (SLR) securities":
 - (i) Dated securities issued up to September 8, 2009 as listed in the Annex to Notification DBOD.No.Ret.BC.40/ 12.02.001/2009-10 dated September 8, 2009
 - (ii) Treasury Bills of the Government of India;
 - (iii) Dated securities of the Government of India issued from time to time under the market borrowing programme and the Market Stabilisation Scheme;
 - (iv) State Development Loans (SDLs) of the State Governments issued from time to time under their market borrowing programme; and

Any other instrument as may be notified by the Reserve Bank of India.

Compliance with SLR Requirements: The Reserve Bank of India requires statutory central auditors of banks to verify the compliance with SLR requirements of 12 odd dates in different months of a financial year not being Fridays. The resultant report is to be sent to the management of the bank and to the Reserve Bank. To verify compliance with SLR requirements, the statutory auditor has to examine two aspects:-

- (i) The correctness of the figure of the demand and time liabilities in India (DTL) at the close of business on the reporting Friday relevant to the dates selected by the auditor, and
- (ii) Maintenance of prescribed percentage of liquid assets on the selected data considering the DTL position on the relevant reporting Friday.

Special points to be noted are:

1. Obtain an understanding of the relevant circumstances of the RBI, particularly regarding composition of items of DTL.
2. Require the branch auditors to verify the correctness of the trial balances relevant to the 12 dates selected by him. The branch auditors should also be specifically requested to examine the cash balance at the branch on the selected dates. The DTL position to the examined will be as on the last Friday of the Second preceding fortnight, i.e., April 11. The position of cash, gold and approved securities shall be as of May 1.
3. Review the relevant returns/received from un-audited branches to identify any obvious errors or omissions or inconsistencies.
4. Examine, on a test basis, the consolidations regarding DTL position prepared by the bank with reference to the related returns received from branches. The auditor should examine whether demand liabilities comprise only those liabilities that must be met on demand.
5. Specifically examine the following items have been excluded from liabilities.
 - ◆ Amount received from deposit insurance and export credit guarantee corporations (ECGC) towards claims in respect of guarantees involved and held pending adjustment of the same towards the related advance.
 - ◆ Amounts received from Court Receiver.
 - ◆ Amount received from insurance companies as a result of "excess claims".
 - ◆ Part amount of recoveries received from the borrowers.
 - ◆ Amounts received in Indian currency against import bills and held in sundry deposits pending receipt of final notes.
 - ◆ Unadjusted deposit/balances buying in link branches for agency business like dividend warrants, interest warrant, refund of application money.
6. Specifically examine that the following items have been included in liabilities
 - ◆ Net credit balance in branch adjustment accounts including these relating to foreign branches.
 - ◆ Interest on deposit as at the end of the firm half year reversed in the beginning of the next half-year.
7. Verify that in computation of liquid assets, the following are treated as cash.
 - ◆ The deposit maintained with RBI by a banking company incorporated outside India under Section 11(2) of the Banking Regulation Act.

- ◆ Any balances maintained by a scheduled bank with the Reserve Bank in excess of the balance required to be maintained by it under section 42 of the Reserve Bank of India Act.
- 8. Test check the relevant records to verify the amount of unencumbered approved securities held by the bank on the selected dates. Examine whether the valuation of approved securities has been done with reference to cost price, market price, book value or face value or a combination of these methods as may be specified by the Reserve Bank of India from time to time.

Question 8

How will you evaluate the internal control system in the area of credit card operations in a bank?

Answer

Evaluation of internal control system in the area of credit card operations: The evaluation of internal control system in the area of credit operations in the bank would have to be done in respect of following aspects:

- (i) **Segregation of Responsibilities:** The activities relating to credit card operations can be divided in specific areas, namely, beginning from the receipt of application form, evaluating the credit assessment, sanctioning the issuance of card, making and despatch of card would form part one of operations. Later on, particularly, from the accounting view, the significant operations would include receipt of statement from vendors/merchants, raising bills to customers, realisation either by directly debiting the customers' accounts or payment received through cheques, periodic reconciliation, etc. While evaluating internal controls, it would have to be seen that adequate division of responsibilities have been carried out to avoid any collusion and independent checks have been built in the system. While evaluating the internal control, it may also be considered whether some part of the operations have been outsourced or performed in-house.
- (ii) **Credit Assessment System:** Each application is scrutinised with reference to different parameters for assessing the credit limits to be awarded. The system must be able to generate exception reports at this stage itself. In fact, at the application stage itself, the system must ensure that the applicant was holding one card earlier or has defaulted in respect of any other agency.
- (iii) **Control Over Issuance of Cards:** The internal control system must ensure that the cards are under the control of responsible official. A detailed record along with relevant pin codes, etc. have been kept. See that the system has built-in features that it is almost impossible to make counterfeit cards as also photographs are affixed to prohibit any unauthorised use of the same.
- (iv) **Reconciling Merchant Records:** It is to be checked whether the system has built-in flexibility of reporting of the payments to be made to merchants and making prompt

payment to them. Simultaneously, it should be seen that customer statements are also generated automatically and despatched to them.

- (v) **Periodic Reconciliation and follow-up:** It may be seen whether periodic reconciliation of customers' accounts is done and regular follow-up of overdue accounts takes place. The person who are responsible for maintaining customers' records are not entrusted with the responsibility of reconciliation and follow-up.

Question 9

Write a short note on - Principal Enactments Governing Bank Audit.

Answer

Principal Enactments Governing Bank Audit: There is an elaborate legal framework governing the functioning of banks in India. The principal enactments which govern the functioning of various types of banks are:

- ◆ Banking Regulation Act, 1949
- ◆ State Bank of India Act, 1955
- ◆ Companies Act, 1956
- ◆ State Bank of India (Subsidiary Banks) Act, 1959
- ◆ Banking Companies (Acquisition and Transfer of Undertakings) Act, 1970
- ◆ Regional Rural Banks Act, 1976
- ◆ Banking Companies (Acquisition and Transfer of Undertakings) Act, 1980
- ◆ Information Technology Act, 2000
- ◆ Prevention of Money Laundering Act, 2002
- ◆ Securitisation and Reconstruction of Financial Assets and Enforcement of Security Interest Act, 2002
- ◆ Credit Information Companies Regulation Act, 2005
- ◆ Payment and Settlement Systems Act, 2007

Besides, the above enactments, the provisions of the Reserve Bank of India Act, 1934, also affect the functioning of banks. The Act gives wide powers to the RBI to give directions to banks which also have considerable effect on the functioning of banks

Question 10

What are the exceptions to the general rule of treating advances as Non-performing Assets (NPAs)?

Answer

Non-performing Assets: RBI has laid down norms for classification of assets and provisioning norms for NPAs. However, certain exceptions to these norms are discussed below:

- (i) Temporary deficiencies, e.g., non availability of current drawing power due to non-receipt of latest stock statement, temporary delay in renewals of limits on due date, etc.
- (ii) *Natural Calamities:* Where, in the wake of natural calamities, short-term agricultural loans are converted into term loans or there is rescheduling of repayment period or fresh short-term loans are sanctioned, the term loan as well as fresh short term loan may be treated as current dues and need not be classified as NPA.
- (iii) *Facilities Backed by Central Government Guarantees:* Credit facilities backed by guarantee of the Central Government though overdue should be treated as NPA only when the government repudiates its guarantee when invoked (this exemption is only for the purpose of asset classification and provisioning and not for the purpose of recognition of income).
- (iv) Advances to "On Lending" arrangements are also exempted under this category.

Question 11

Write a short note on - Vostro and Nostro Accounts.

Answer

Vostro and Nostro Accounts: Bank's maintain stocks of foreign currencies in the form of Bank Accounts with their overseas branches/correspondents. Such foreign currency accounts maintained by Indian banks at other overseas centres are designated by it as "Nostro Account". For example, all banks in India would be maintaining a US Dollar Account with their New York office/branch/correspondents, such account would be designated by the Indian office as Nostro Account. "Vostro Account" is the opposite of Nostro accounts. Here a foreign bank in another country maintains stocks of Indian rupees with their Indian branch/correspondent/local bank. Such Indian Rupee Accounts are designated as a Vostro Account. For example, a German Bank might maintain a Vostro Account in rupees in terms with Indian Bank. While examining the transaction in foreign exchange, the auditor should also pay attention to reconciliation of Nostro Accounts with the respective minor account. The amount in the Nostro account is stock of foreign currency in the form of bank accounts with the overseas branches and correspondents. Unreconciled Nostro Accounts, on an examination, may reveal unauthorized payments from the foreign currency account, unauthorized withdrawals, and unauthorized debit to minor account. The auditor should also evaluate the internal control with regard to inward/ outward messages. The inward/ outward messages should be properly authenticated and discrepancies noticed, should be properly dealt with, in the books of accounts.

The auditor should also verify whether prescribed procedure in relation to inter bank confirmation in the Vostro account is followed or not. In case balance confirmation certificate have been received but the same have not been reconciled, or where confirmation has not been received the same should be reported, in respect of each Vostro Account.

Question 12

Explain the scope of concurrent audit of a bank with reference to Reserve Bank of India guidelines.

Answer**Scope of concurrent audit of banks with reference to RBI guidelines**

The following are the areas to be covered:

- (i) Daily cash transactions with reference to abnormal receipts and payments. This will include currency chest transactions, major expenses met by cash, high value receipts and disbursements.
- (ii) Purchase and sale of shares securities etc. Physical verification of investments and rates at which they are entered into.
- (iii) Verification of procedure and documentation to open new current, savings, term deposit accounts, etc. Unusual operations noticed have to be thoroughly examined.
- (iv) Verification of advances, overdrafts, temporary OD, Cash credit accounts, term loans, bills purchase, letters of credit etc. Procedure for sanction and documentation to be verified. Any deviation noticed to be examined in great detail.
- (v) Foreign exchange transactions to be verified with reference to RBI guidelines.
- (vi) Verification of balancing of all ledgers and registers, inter branch reconciliation calculation and verification of interest, discount, commission etc.
- (vii) Revenue leakage to be detected.
- (viii) Special efforts to be made in all fraud prone areas. The attempt should be to ensure that all effective measures are taken to prevent frauds.
- (ix) Verification of high value transactions.
- (x) Procedure for safe custody of security forms with the branch.
- (xi) Whether all procedures for tax deduction at source are followed and the tax so deducted are deposited into Government Account within the time fixed.
- (xii) Verification of returns, statements, calculation of capital adequacy ratio and compliance with requirements of government business.
- (xiii) Study of RBI and Internal Inspection reports statutory auditors report and compliance thereto.
- (xiv) Whether the customers' complaints are dealt with promptly.

Question 13

How would you verify "Acceptances, Endorsements and other obligations" appearing in the Balance Sheet of a bank?

Answer

Acceptances, Endorsements and Other Obligations: This item includes the following balances:

- (a) letters of credit opened by the bank on behalf of its customers and
- (b) bills drawn by the bank's customers and accepted/endorsed by the bank.

Letters of credit: Evaluate the adequacy of the internal controls over LC Forms e.g. custody, maintenance of records, periodical verification, reconciliation etc.

Verify the balance of LC from the Register maintained by the bank to ascertain the amount of LC and payments made under them.

Examine the guarantees of the customers, copies of the LC issued & security obtained for issuing LC.

In respect of other acceptances and endorsements the following procedure may be adopted.

- (i) Examine the arrangements made by the bank with its customers.
- (ii) Test check the amounts of bills with the register maintained by the bank.
- (iii) Verify whether such bills are marked off in the register on payment at maturity.

Letters of comfort: Where letters of comfort has been issued, verify whether the bank has incurred a potential financial obligation under such a letter. If an obligation has been cast under letters of comfort, ensure that the amount has also been shown as contingent liability in the Balance Sheet.

Question 14

How are investments to be classified in the financial statements of a Bank?

Answer

Classification of Investments in the Financial Statements of a Bank

The entire investment portfolio of the banks (including SLR securities and non-SLR securities) should be classified under three categories viz., 'Held to Maturity', 'Available for Sale' and 'Held for Trading'.

However, in the balance sheet, the investments will continue to be disclosed as per the existing six classifications viz., (a) Government securities; (b) Other approved securities; (c) Shares; (d) Debentures & Bonds; (e) Subsidiaries/Joint Ventures and (f) Other (CP, Mutual Fund Units, etc)

Banks should decide the category of the investment at the time of acquisition and the decision should be recorded on the investment proposals.

Held to maturity

- (i) The securities acquired by the banks with the intention to hold them up to maturity will be classified under *Held to Maturity*.
- (ii) The investments included under 'Held to maturity' should not exceed 25 per cent of the bank's total investments.
- (iii) The following investments are to be classified under 'Held to Maturity' but will not be counted for the purpose of ceiling of 25% specified for the category:
 - (a) Re-capitalisation bonds received from the Government of India towards their re-capitalisation requirement and held in their investment portfolio.
 - (b) Investment in subsidiaries and joint ventures. [A joint venture would be one in which the bank, along with its subsidiaries, holds more than 25% of the equity.]
 - (c) The investments in debentures/bonds, which are deemed to be in the nature of an advance.
- (iv) Profit on sale of investments in this category should be first taken to the Profit & Loss Account and thereafter be appropriated to the 'Capital Reserve Account', Loss on sale will be recognized in the Profit & Loss Account.

Held for Trading

The securities acquired by the banks with the intention to trade by taking advantage of the short-term price/interest rate movements will be classified under *Held for Trading*.

The investments classified under held for trading category would be those from which the bank expects to make a gain by the movement in the interest rates/market rates. These securities are to be sold within 90 days.

Available for Sale

The securities which do not fall within the above two categories will be classified under *Available for Sale*.

Profit or Loss on sale of investments in both the categories will be taken to the Profit & Loss Account.

Question 15

Write a short a note on - Contingent Liabilities for Banks.

Answer

Contingent Liabilities for Banks: The Third Schedule to the Banking Regulation Act, 1949 requires the disclosure of the following as a footnote to the balance sheet.

(a) Contingent liabilities

- (i) Claims against the bank not acknowledged as debts.

Advanced Auditing and Professional Ethics

- (ii) Liability for partly paid investments.
- (iii) Liability on account of outstanding forward exchange contracts.
- (iv) Guarantees given on behalf of constituents
 - (a) In India.
 - (b) Outside India
- (v) Acceptances, endorsements and other obligations.
- (vi) Other items for which the bank is contingently liable.

(b) Bills for collection.

Question 16

- (i) *What do you understand by Long-form Audit Report?*
- (ii) *As the concurrent auditor of Nagpur Main Branch of XYZ Bank Ltd. state the issues which have to be considered in the audit of advances.*

Answer

- (i) The long form Audit Report has to be furnished by the auditor of a bank in addition to the audit report as per the statutory requirement. The matters which the banks require their auditor to deal with in the form of Long Form Audit Report have been specified by to Reserve Bank of India.
- (ii) The items to be covered in the current audit of advances of a bank are as follows:
 - (1) Ensure that loans and advances are sanctioned properly.
 - (2) Verify whether the sanctions are in accordance with the delegated authority.
 - (3) Ensure that securities and documents have been received and properly charged/registered.
 - (4) Ensure that post disbursement supervision and follow up is proper.
 - (5) Verify whether there is any misuse of loans and advances and whether there are instances indicative of diversion of funds.
 - (6) Check whether letters of credit issued by the branch are within the delegated power and ensure that they are genuine trade transactions.
 - (7) Check bank guarantees issued are properly worked and recorded.
 - (8) Ensure proper follow up of over due bills of exchange.
 - (9) Verify the classifications of advances are as per RBI directions.
 - (10) Verify whether the submission of claims to DICGC and ECGC is in time.

- (11) Verify the instances of exceeding delegated powers have been promptly reported.
- (12) Verify the frequency and genuineness of such exercise of authority beyond to delegated powers of the concerned officials.

Question 17

How will you evaluate the Internal Control system in the area of Credit Card operations of a Bank?

Answer

Evaluation of Internal Control System in the area of Credit Card Operations in a bank:

- (i) There should be effective screening of applications with reasonably good credit assessments.
- (ii) There should be strict control over storage and issue of cards.
- (iii) There should be a system whereby a merchant confirms the status of unutilised limit of a credit-card holder from the bank before accepting the settlement in case the amount to be settled exceeds a specified percentage of the total limit of the card holder.
- (iv) There should be system of prompt reporting by the merchants of all settlements accepted by them through credit cards.
- (v) Reimbursement to merchants should be made only after verification of the validity of merchant's acceptance of cards.
- (vi) All the reimbursements (gross of commission) should be immediately charged to the customer's account.
- (vii) There should be a system to ensure that statements are sent regularly and promptly to the customer.
- (viii) There should be a system of monitor and follow-up of customers' payments.
- (ix) Items overdue beyond a reasonable period should be identified and attended to carefully. Credit should be stopped by informing the merchants through periodic bulletins, as early as possible, to avoid increased losses.
- (x) There should be a system of periodic review of credit card holders' accounts. On this basis, the limits of customers may be revised, if necessary. The review should also include determination of doubtful amounts and the provisioning in respect thereof.