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June 30, 2025

To:

Advocacy@theiia.org

Cc:

Roberto.Rosas@theiia.org

Veronica.Pastor@theiia.org

Subject: Comment Letter – Disciplinary & Oversight Framework (DOF)

Dear Mr. Rosas and Ms. Pastor,

On behalf of Cherry Hill Advisory, a firm specializing in CFO services and internal audit outsourcing, I am writing to express our strong support for the IIA's proposed Disciplinary & Oversight Framework (DOF).

Cherry Hill Advisory is a risk advisory firm headquartered in New Jersey, dedicated to providing **internal audit, risk advisory, thought leadership, and compliance services**. Our team comprises professionals who bring decades of experience helping clients strengthen governance, mitigate risks, and elevate the quality and value of their internal audit functions. We pride ourselves on combining traditional auditing principles with modern methodologies to deliver internal audit services that not only ensure compliance but also drive operational improvement and strategic insights.

Given our experience advising and operating internal audit functions we have a deep appreciation for the importance of robust standards and professional accountability. We view the DOF as a critical and timely advancement for the profession.

We support the DOF for several key reasons:

- **Reinforcing Professional Standards:** A formalized disciplinary framework aligns with the broader push for higher standards under the new Global Internal Audit Standards. It sends a clear message that membership and certification carry obligations beyond technical competence.

- **Transparency and Fairness:** The proposed process appropriately emphasizes due process, confidentiality, and proportionality. This balance ensures that practitioners are treated fairly while upholding the profession's integrity.
- **Global Consistency:** Establishing a consistent disciplinary process worldwide is vital, especially for firms like ours operating across jurisdictions. A unified approach will reduce uncertainty and strengthen confidence in the IIA's governance.
- **Public Confidence:** The profession's reputation depends on stakeholders knowing that misconduct will be addressed promptly and professionally. The DOF provides a structured means to protect that reputation, which benefits practitioners and the organizations we serve.

While we are fully supportive, we respectfully offer the following three recommendations for enhancing the DOF:

1. **Clearer Definitions of Misconduct:** The DOF should provide more specific examples and definitions of misconduct categories to minimize ambiguity and ensure consistent interpretation across regions and cases.
2. **Publication of Aggregate Data:** We recommend publishing anonymized annual statistics on disciplinary actions, types of infractions, and outcomes. This transparency would reinforce accountability and serve as a learning tool for practitioners without breaching confidentiality.
3. **Mechanism for Rehabilitation:** For less severe violations, the DOF could incorporate a formal path for rehabilitation or remedial action, such as mandatory ethics training or monitored practice, allowing professionals to regain good standing where appropriate.

Cherry Hill Advisory strongly endorses the adoption of the DOF and believes that with these refinements, it will further strengthen trust and professionalism in our field. We appreciate the IIA's diligence in crafting this framework and welcome the opportunity to support its implementation.

Should you have any questions, please contact me at Mike@CherryHillAdvisory.com.

Sincerely,

A handwritten signature in black ink that reads "Michael Levy". The signature is written in a cursive style with a horizontal line underneath the name.

Mike Levy, CIA, CRMA, CISA, CISSP, CDPSE

Chief Executive Officer

Cherry Hill Advisory