

Chapter 3

Internal Audit

Corporate risk management is a natural fit for internal auditing involvement. Modern internal auditors are accustomed to identifying and evaluating risks, and they typically have extensive knowledge of the overall business

Walker *et al.*, 2002: 16

3.1 Introduction

To achieve its business objectives, management should ensure that sound risk management processes are in place and functioning. Boards have an oversight role to determine that appropriate risk management processes are in place and that these processes are adequate and effective. Internal auditors should assist both management and the board by examining, evaluating, reporting and recommending improvements on the adequacy and effectiveness of management's risk processes (IIA Standards, 2002).

Rarely are demands for professionalism, knowledge, integrity, and leadership more stringent than those placed on today's internal auditors. Effective auditors serve as the businesses corporate consciousness and they champion operational effectiveness, internal control, and risk management. They can also educate and make recommendations to management and the board of directors to support the business in meeting its goals and objectives.

3.2 Aim

The aim of this chapter will be to introduce internal auditing, its governing body and the role that the activity can play in the corporate risk management initiative of the healthcare financing organisation.

3.3 The Institute of Internal Auditors Inc.

The Institute of Internal Auditors Inc. (IIA) was established in 1941 and serves nearly 85,000 members in internal auditing, governance and internal control, IT audit, education, and security worldwide. The IIA provides for certification, education, research, and technological guidance, it also serves as the profession's watchdog and resource on significant auditing issues around the globe (www.theiia.org).

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In the years preceding the incorporation of the IIA in 1941, growth and expansion made it increasingly difficult for organisations to maintain control and operational efficiency. The shift to a war economy further expanded organisations' responsibilities for scheduling, availability of materials and labourers, compliance with government regulations and an increased emphasis on cost reduction (ibid.).

Management found it impossible to visually observe all of the operating areas in their respective areas of responsibility or to have sufficient personal contact with individuals who directly or indirectly reported to them. In seeking ways to deal with these new problems, management appointed special staff people to review and report on what was happening. These people came to be known as internal auditors (Sawyer *et al.*, 1996).

The internal auditing function varied greatly as to the number of people assigned to perform it and in the scope and nature of the work being done. In some organisations, internal auditors were used to check on routine financial and operational activities with a heavy emphasis on compliance, security, and detection of fraud. In others, internal auditors were given higher levels of status and were asked to analyse and appraise more substantive financial and operational activities. As the profession evolved, a number of internal auditors began pushing vigorously for greater understanding and recognition of their function, and began to develop contacts and relationships with professionals in other organisations in an attempt to share problems and to advance their common interests (ibid.).

John B. Thurston, head of the internal auditing function at the North American Company utility company, was among the first to push vigorously for greater understanding and recognition of the internal auditing function. He is credited with being the person most responsible for the creation of the IIA. Thurston was joined in his thinking by Robert B. Milne, general auditor of the Columbia Engineering Corporation, and Victor Z. Brink, a former auditor and Columbia

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University educator who authored the first major book on internal auditing (www.theiia.org.).

Thurston, Milne, and Brink, acting as an organising committee, contacted 40 friends and associates from the utilities industries, public accounting firms, and other industries, 25 of whom agreed to participate in forming a new organisation for internal auditors. Seventeen individuals attended an organisational meeting on September 23, 1941, at the Williams Club in New York City and agreed to start a new professional organisation for internal auditors. Thurston was appointed interim organising director and Arthur E. Hald of Consolidated Edison Co. was asked to oversee creation of a charter and bylaws (ibid.).

On November 17, The IIA's Certificate of Incorporation was filed which officially established The IIA's name; recognised the IIA as a membership corporation; and identified corporation's specific purposes, which were:

“To cultivate, promote, and disseminate knowledge and information concerning internal auditing and subjects related thereto; to establish and maintain high standards of integrity, honour, and character among internal auditors; to furnish information regarding internal auditing and the practice and methods thereof to its members, and of other persons interested therein, and to the general public; to cause the publication of articles relating to internal auditing and practices and methods thereof; to establish and maintain a library and reading rooms, meeting rooms, and social rooms for the use of its members; to promote social intercourse among its members; and to do any and all things which shall be lawful and appropriate in furtherance of any of the purpose herein before expressed.” (ibid.)

The IIA was a national organisation at the outset with several of its 24 original members hailing from both the East Coast and the Midwest of the United States. IIA membership grew to 104 members by the end of the first year, and increased to 1,018 at the end of five years and to 3,700 by 1957, with 20 percent of the latter located outside the United States (ibid.).

The IIA's current mission is to be the primary international professional association, organised on a worldwide basis, dedicated to the promotion and development of the practice of internal auditing. The IIA is committed to (ibid.):

- Providing, on an international scale, comprehensive professional development activities, standards for the practice of internal auditing, and certification.
- Researching, disseminating, and promoting to its members and to the public throughout the world, knowledge and information concerning internal auditing, including internal control and related subjects.
- Establishing meetings worldwide in order to educate members and others as to the practice of internal auditing as it exists in various countries throughout the world.
- Bringing together internal auditors from all countries to share information and experiences in internal auditing and promoting education in the field of internal auditing.

In June of 1999, the IIA's Board of Directors voted to approve a new definition of internal auditing and a new Professional Practices Framework. Both were based on the recommendations of the Guidance Task Force, a special committee of IIA charged with examining the adequacy of current standards and guidance for the practice of internal auditing. The Task Force concluded that a significant gap existed between available guidance and current practice and that a new framework was needed to carry the profession into the 21st century. In order to meet this goal, The IIA has developed the Professional Practices Framework (PPF). In general; the framework provides a structural blueprint of how a body of knowledge and guidance fits together. As a coherent system, it facilitates consistent development, interpretation, and application of concepts, methodologies, and techniques useful to a discipline or profession. Specifically, the purpose of the PPF is to organise the full range of internal audit guidance in a manner that is readily accessible on a timely basis. By encompassing current internal audit practice as well as allowing for

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future expansion, the PPF is intended to assist practitioners throughout the world in being responsive to the expanding market for high quality internal audit services (IIA Standards, 2002).

Throughout the world, internal auditing is performed in diverse environments and within organisations that vary in purpose, size, and structure. In addition, the laws and customs within various countries differ from one another. These differences may affect the practice of internal auditing in each environment. The implementation of the PPF, therefore, will be governed by the environment in which the internal audit activity carries out its assigned responsibilities. No information contained within the PPF should be construed in a manner that conflicts with applicable laws or regulations. If a situation arises where information contained within the PPF may be in conflict with legislation or regulation, internal auditors are encouraged to contact The IIA or legal counsel for further guidance (ibid.)

The Professional Practices Framework consists of three categories of guidance: Standards and Ethics, Practice Advisories, and Development and Practice Aids. The first category (Mandatory Guidance) consists of core materials: the Code of Ethics and the International Standards for the Professional Practice of Internal Auditing (Standards). All mandatory guidance has been submitted for review by the profession through the exposure draft process and is considered to be essential for the professional practice of internal auditing. Other elements of the Framework are linked to these Standards (ibid.).

The purpose of IIA's Code of Ethics is to promote an ethical culture in the profession of internal auditing. A code of ethics is necessary and appropriate for the profession of internal auditing, founded as it is on the trust placed in its objective assurance about risk management, control, and governance (ibid.).

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Standards, as described within the PPF, are the criteria by which the operations of an internal audit department are evaluated and measured. They are intended to represent the practice of internal auditing as it should be. The Standards are meant to serve the entire profession of internal auditing, in all types of organisations where internal auditors are found. Within the new framework, the Guidance Task Force called for the development of three sets of standards: Attribute, Performance, and Implementation Standards. The Attribute Standards address the attributes of organisations and individuals performing internal audit services. The Performance Standards describe the nature of internal audit services and provide quality criteria against which the performance of these services can be measured. The Attribute and Performance Standards apply to all internal audit services. The Implementation Standards expand upon the Attribute and Performance Standards, providing guidance applicable in specific types of engagements. These standards ultimately may deal with industry-specific, regional, or specialty types of audit services (ibid.).

Compliance with the concepts enunciated in the mandatory guidance is essential before the responsibilities of internal auditors can be met. As stated in the Code of Ethics, internal auditors shall perform internal audit services in accordance with the Standards. All members of the IIA and all Certified Internal Auditors agree to abide by the Standards and Code of Ethics, and this guidance is intended to be applicable to all members of the internal audit profession, whether or not they are members of the IIA (ibid.).

To be widely applicable, mandatory guidance must necessarily be somewhat generic in nature. Therefore, the PPF includes two additional categories of guidance. Guidance in the second category, the Practice Advisories (formerly known as Guidelines) are strongly recommended and endorsed by The IIA. Although not mandatory, Practice Advisories represent best practices endorsed by the IIA as ways to implement Standards. In part, Practice Advisories may help to interpret the Standards or to apply them in specific internal audit environments. Many Practice Advisories are applicable to all

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internal auditors, while others may be developed to meet the needs of internal auditors in a specific industry, audit specialty, or geographic area. All Practice Advisories are submitted to a formal review process by the IIA's Professional Issues committee or other group designated by the Guidance Planning Committee (ibid.).

The third category of guidance (Development and Practice Aids) includes a variety of materials that are developed and/or endorsed by the IIA. This category includes research studies, books, seminars, conferences, and other products and services related to the professional practice of internal auditing that do not meet the criteria for inclusion in mandatory guidance or Practice Advisories. Development and practice aids can help to implement the guidance offered in the Code of Ethics, Standards, and Practice Advisories. Development and practice aids provide internal audit practitioners with the views of various experts on techniques and processes related to the professional practice of internal auditing (www.theiia.org).

3.4 Internal auditing activity

As mentioned earlier, the IIA redefined internal auditing in June 1999. The revised definition being (IIA Standards, 2002):

“Internal Auditing as an independent, objective assurance and consulting activity designed to add value and improve an organisation’s operations. It helps an organisation accomplish its objectives by bringing a systematic, disciplined approach to evaluate and improve the effectiveness of risk management, control and governance processes”

The internal auditing profession worldwide is undergoing significant reengineering (Gupta, 2001: 3-5). This reengineering is involving the optimal restructuring of internal audit functions to focus on core and support business processes thereby aiding organisations in achieving their business objectives in risk intelligent ways.

It is generally accepted that this reengineering would involve the following key principles within internal audit (ibid.):

- Fundamental rethinking of internal audit's role in the organisation (i.e. a policeman type role or a value-added strategic partner with management in helping them achieve the organisation's business objectives;
- reestablishment of internal audit's focus in light of the role as defined above;
- redesign of internal auditing processes to align them with the new role and the new focus; and
- redesign of the internal auditing department structure.

According to the proceedings of the First European Internal Auditing Forum organised by KPMG, a reengineered internal auditing function should exhibit many of the following characteristics (ibid.):

- Be able to act as business partners with management or its other customers;
- be a solution-provider rather than service-provider;
- ensure that the culture of the internal auditing department reflects that of the business as a whole;
- ensure that there is a consistency between the charter, objectives, and mission of an internal auditing department and the organisation's mission, and strategic objectives;
- be able to act as agents of change by becoming proactive champions and getting involved in major organisational change;
- understand and concentrate on the business risk management function and be able to link it with corporate priorities;
- be able to act as facilitators for sharing best practices across the entire organisation; and
- be able to develop an internal auditing process capable of positioning the internal audit function to provide a full array of services across the spectrum— from basic compliance audit work to consulting work – while

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ensuring that the internal auditing function delivers seamless service to its customers.

Organisational transformation and the need to do more with fewer resources have thrust risk and control issues to the forefront as never before, the following three excerpts from various publications support this claim:

1. (Editorial 1993)

“[The changing business environment] has accelerated downsizing and the introduction of new methods such as” empowerment and total quality management.” Layers of middle management have been removed and the hierarchical, bureaucratic approach abandoned... Where does that leave the directors, management, and auditors who have to satisfy themselves and others that an organisation continues to be under control? [We are] in need of a fundamental rethinking of what control is and how it can be achieved?”

2. (Gibbs et al., 1995: 46)

“Control environments have been shaken and shifted [in a majority of the business organisations] as a result of downsizing, flattening and decentralisation... Many of the controls on which auditors have traditionally reviewed, such as separation of duties and authorisations, actually tend to work at cross-purposes to the goals of the reengineered, virtual corporation.”

(Simon, 1995: 80)

“A fundamental problem facing managers in the 1990’s is how to exercise adequate control in organisation’s that demand flexibility, innovation and creativity. Competitive businesses with demanding and informed customers must rely on employee initiatives to seek out opportunities and respond to customer needs. But pursuing some opportunities can expose businesses to excessive risk or invite behaviours that can damage a company’s integrity.”

The above observations are valid because hardly a day goes by when people do not hear or read about an organisation that has been either slapped on the wrist or fined heavily by one or more governmental oversight agencies for failing to protect the interests of its stakeholders. The cost of these control breakdowns is enormous to the companies in terms of “damaged reputations, fines, business losses, missed opportunities, and diversion of management attention to deal with the crisis” (ibid.). Organisations of today now face a whole host of new risks, such as information technology risks, customer information privacy risks, risk related to all aspects of e-commerce, and so forth.

Traditionally, risk was always thought of as financial and compliance in nature by the internal auditor (Gupta, 2001: 54). However in today’s changing environment, the concept of risk has assumed a larger framework. Risk is now perceived in terms of “business” risk rather than only “financial and compliance” risk. Therefore, if this increased risk exposure is not managed effectively with an integrated risk management process, all the gains that have accrued to business organisations could not only potentially disappear, but could also jeopardise the very survival of an organisation.

Financial and compliance controls have been traditionally under the jurisdiction of internal auditors who primarily worked as “policemen” to protect stakeholder value. Proactively speaking, due to their historical involvement in the financial and compliance risks and controls area, who better than the

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internal auditors to help organisations manage these new and unfamiliar business risks? To discharge those broadened functions and increased responsibility diligently, internal auditors need to change their mind set as suggested by Peter M. Senge in his book, *The Fifth Discipline: The Art & Practice of the Leading Organisation* (Senge, 1990: 8). In his book, he describes the importance of organisational learning to survive and compete in today's business environment. And this mind-set change about the role of internal auditing in this new economy will come only by radically reengineering the traditional internal audit approach towards risk and other related activities of the traditionally focused internal audit function.

A more recent trend within the internal audit fraternity is the spearheading of companywide knowledge-sharing efforts by internal auditors. These activities involve the internal audit function assisting management in securing the organisation's understanding of business risk and ensuring the increased awareness of control strategies (Hala, 2002: 32-35):

“Effective knowledge management is crucial to [corporate risk management], which is predicted on the understanding that business processes, risks, and controls across the organisation are interrelated. Identifying root causes of business risks is part of the foundation of [corporate risk management] because targeting specific root causes helps the organisation use its risk management resources more efficiently.

...Nothing in business happens in a vacuum, and rarely do problems occur only once. Mistakes are made, and processes and systems break down. However, a knowledge-sharing initiative led by internal auditing, combined with [corporate risk management] decreases the time it will take for a business to pinpoint mistakes and mitigate risks across the enterprise, and thus, reduces the severity and the scope of those risks.”

3.5 Internal auditing of the corporate risk management methodology

An entity's corporate risk management process changes over time. Risk responses that were once effective may become irrelevant; control activities may become less effective, or no longer be performed; or entity objectives may change. This can be due to the arrival of new personnel, changes in entity structure or direction, or the introduction of new processes. In the face of such changes, management needs to determine whether the functioning of each corporate risk management component continues to be effective (COSO, 2003: 79).

Accordingly, the risk management programme should be audited and reviewed periodically, both from an inside and outside perspective. Such an objective assessment should not just include financial and actuarial issues but more importantly whether the risk management programme is achieving its intended vision and associated goals (Young, 2001: 403).

The revised King Report on Corporate Governance recommends that the internal audit activity should not assume the functions, systems and processes of risk management (King Committee, 2002: 76). However, internal audit can play a pivotal role in providing independent assurance regarding the effectiveness of the risk management process within the medical scheme environment. The internal auditor's role in the corporate risk management programme is guided by a selection of local and international standards. Understanding these guidelines will ensure that the internal auditor does not accept responsibilities that could hinder his or her objectivity:

- *IIA Standard 2100: Nature of Work* (IIA Standards, 2002):
 - The internal audit activity evaluates and contributes to the improvement of risk management, control and governance systems.
- *Practice Advisory 2100-3* (IIA Practice Advisories, 2001):
 - Internal auditors should assist both management and the audit committee by examining, evaluating, reporting and recommending

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improvements on the adequacy and effectiveness of management's risk processes.

- Internal audit could act in a consulting role and assist in identifying, evaluating, and implementing risk management methodologies and controls to address risks.
- Developing assessments and reports on the risk management processes is normally a high audit priority.
- Internal audit should identify and evaluate significant risk exposures in the normal course of their duties.
- Internal audit's role in the risk management process may change over time and may be found at some point along a continuum that ranges from:
 - No role, to
 - Auditing the risk management process as a part of the internal audit plan, to
 - Active, continuous support and involvement in the risk management process such as participation on oversight committees, monitoring activities and status reporting, to
 - Managing and coordinating the risk management process.
- Ultimately, it is the role of executive management and the audit committee to determine the role of internal audit in the risk management process.
- Management's view on internal audit's role is likely to be determined by factors such as culture, ability of the internal audit staff and the external environment.
- *King Report on Corporate Governance:*

Under this code, the internal auditor may not be involved in the functions, systems, and processes related to risk management. Their role is simply to assist the board and management in monitoring the said process. Refer to table 7.1 of chapter 7 for more comprehensive information.

Monitoring can be done in two ways: either by means of ongoing activities or separate evaluations. Corporate risk management mechanisms usually are

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structured to monitor themselves on an ongoing basis, at least to some degree. The greater the degree and effectiveness of ongoing monitoring, the less need for separate evaluations by assurance providers such as internal audit functions. The frequency of separate evaluations necessary for management to have reasonable assurance about the effectiveness of corporate risk management is a matter of management's judgment. In making that determination, consideration is given to the nature and degree of changes occurring, from both internal and external events, and their associated risks; the competence and experience of the personnel implementing risk responses and related controls; and the results of the ongoing monitoring (ibid).

In the case of ongoing monitoring, this process is performed on a real-time basis, reacts dynamically to changing conditions, and is ingrained in the entity. As a result, it is more effective than separate evaluations. Since separate evaluations take place after the fact, problems often will be identified more quickly by ongoing monitoring routines. Many entities with sound ongoing monitoring activities nonetheless conduct separate evaluations of corporate risk management. An entity that perceives a need for frequent separate evaluations should focus on enhancing ongoing monitoring activities by "building in" versus "adding on" such activities (COSO, 2003: 81).

While ongoing monitoring procedures usually provide important feedback on the effectiveness of other corporate risk management components, it may be useful to take a fresh look from time to time, focusing directly on corporate risk management effectiveness. This also provides an opportunity to consider the continued effectiveness of the ongoing monitoring procedures (ibid.).

Separate evaluations of the entire corporate risk management programme may be prompted by a number of reasons: major strategy or management change, major acquisitions or dispositions, significant change in economic or political conditions, or significant changes in operations or methods of processing information. When a decision is made to undertake a comprehensive evaluation of an entity's corporate risk management, attention

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should be directed to addressing its application in strategy setting as well as with respect to significant activities (COSO, 2003: 83).

In both approaches, the extent of documentation of an entity's corporate risk management varies with the entity's size, complexity, and similar factors. Larger organisations usually have written policy manuals, formal organisation charts, written job descriptions, operating instructions, information system flowcharts, and so forth. Smaller entities typically have considerably less documentation. Many aspects of corporate risk management are informal and undocumented, yet are regularly performed and highly effective. These activities may be tested in the same ways as documented activities. The fact that elements of corporate risk management are not documented does not mean that they are not effective or that they cannot be evaluated. However, an appropriate level of documentation usually makes monitoring more effective and efficient (COSO, 2003: 85).

Deficiencies regarding the corporate risk management programme usually should be reported not only to the individual responsible for the function or activity involved, but also to at least one level of management above that person. This higher level of management provides needed support or oversight for taking corrective action and is positioned to communicate with others in the organisation whose activities may be affected. Where findings cut across organisational boundaries, the reporting should cross over as well and be directed to a sufficiently high level to ensure appropriate action (COSO, 2003: 86).

Figure 3.1: Suggested objective assessment approach



Figure 3.1 above depicts a suggested objective assessment approach that can be applied by the internal auditor in verifying the effectiveness and efficiency of the risk management process. The following sources were relied upon in developing the suggested process:

- De Loach, 2000
- Discovery, 2001
- IIA Practice Advisories, 2001
- King Committee, 2002
- IIA Standards, 2002.

In assessing the sufficiency and appropriateness of the existing risk management architecture, the internal auditor could attempt to validate the following control objectives:

- The business risk management function has developed a risk management programme that complies with the requirements of governance standards.

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- The board and senior management has sanctioned the developed corporate risk management methodology.
- The following five governance objectives have been achieved (Practice Advisory 2110-1):
 - Risks devolving from the business strategies and activities are identified and prioritised;
 - management and the board have set risk tolerances acceptable to the medical scheme;
 - risk management strategies to address unacceptable levels of residual risk have been established and sanctioned by the board;
 - the risk management process is ongoing to ensure that the effectiveness of controls is revisited; and
 - the board and management receive periodic reports on the results of the risk management process.

Suitable audit procedures, which could be applied by the internal auditor in ascertaining whether the abovementioned control objectives have been achieved by management, include (IIA Practice Advisories, 2001 and COBIT, 2002):

- Review the adequacy and timeliness of reporting on risk management results;
- qualifications of risk management personnel are adequate;
- assess the appropriateness of reporting lines for risk monitoring activities;
- review the completeness of management's risk analysis, actions taken to address issues raised by risk management processes and suggest improvements;
- assimilate information to independently evaluate the effectiveness of risk mitigation, monitoring and communication of risks and associated control activities;
- review previous risk evaluation reports by management and other assurance services;

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- review corporate policies, board and audit committee minutes to determine the organisation's business strategies, risk management philosophy, risk tolerance levels and risk management strategies;
- determine whether operational personnel understand and formally accept residual risk subsequent to each assessment, i.e. – proof of acceptance and sign off;
- risk assessment documentation complies with the adopted risk management methodology and documentation is appropriately prepared and maintained. Such documentation could include:
 - Details on the uniform process adopted and possible reference to the corporate risk management methodology sanctioned by the board;
 - a description of the significant risks linked to individual business objectives;
 - risk scoring criteria and overall prioritisation results subsequent to discounting absolute risk scores with control effectiveness and frequency assessments;
 - heat maps graphically depicting high, moderate and low threats; and
 - risk action plans detailing appropriate risk management strategies to be used in eliminating unacceptable levels of residual risk. Acceptance of residual risk should take into account the approved risk management tolerances set by the business risk committee and board.

If the internal auditor is of the opinion that the risk management process has deficiencies, an appropriate finding should be raised in his audit report (IIA Practice Advisories, 2001). This feedback should also be forwarded to the chief risk officer for improvement in the existing risk management processes.

On a final note, internal audit activities are beginning to place reliance on the output of existing risk management activities as a basis for determining auditable entities within the organisation. A trend, which the author believes will increase.

3.6 Summary and conclusion

The author introduces the concept of internal auditing and the background regarding its professional governing body, viz. The IIA. The IIA was established in 1941 and serves nearly 85,000 members in internal auditing, governance and internal control, IT audit, education, and security worldwide. In June of 1999, the IIA's Board of Directors voted to approve a new definition of internal auditing and a new Professional Practices Framework.

With respect to the internal auditor's role in the risk management process, simply stated, it is to provide objective feedback on whether the risk management process is rigorous enough to ensure that the plethora of risks faced by healthcare administration organisations is being suitably managed.

The bulk of an entity's risks relate to selecting strategies and objectives, establishing operational goals and accountabilities, allocating funds among projects and business segments, minimizing exposure to loss of reputation or creditability and making optimal uses of technology to manage the entity. Consequently, the enhancement of internal auditor's traditional assurance role on both financial and non-financial areas, as well as the expansion of its assessment, process improvement and related consulting activities is a logical complement to the business's broad risk management initiative. Accordingly, it is necessary that the internal audit activity increase its service offerings to management, the board and the entity's other stakeholders.