Fiscal Year 2022 Annual Report
October 11, 2022

Sarah Hicks
Governor’s Office
Internal Audit Coordinator
State Auditor’s Office

Christopher Mattson
Legislative Budget Board

The Texas Internal Auditing Act (Act), Texas Government Code, Sec. 2102, as amended requires the Internal Auditor to submit to you the attached report of the activities of the Internal Auditing Department for fiscal year 2022. This report contains the information presented in the format prescribed by the State Auditor’s Office, as required by the Act.

Please do not hesitate to contact me should you have any questions about the contents of this report.

Sincerely,

Phillip W. Hurd
Chief Audit Executive

Attachments
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I. Compliance with Texas Government Code, Section 2102.015: Posting the Internal Audit Plan, Internal Audit Annual Report, and Other Audit Information on the website.

To comply with Texas Government Code 2102.015 requirements for posting the Internal Audit Plan and Internal Audit Annual Report, and other information on the internet, the University of Houston System Internal Auditing Department posts its Annual Audit Plan and the Internal Audit Annual Report on the UHS Internal Auditing Department’s website at https://uhsystem.edu/internal-audit/.

II. Internal Audit Plan for Fiscal Year 2022

Internal auditing is currently undergoing skills upgrade processes to integrate additional analytics, computer assisted auditing techniques (CAAT), robotic process automation (RPA) and basic artificial intelligence (AI.). The University of Houston Internal Auditing Department was reorganized in fiscal year 2022.

For the fiscal year 2022 audit plan, the internal auditing department obtained input from various resources, including senior leadership, risk owners/stakeholders in various areas, and a completed compliance risk assessment to create a risk inventory. We employed an industry standard methodology considering likelihood and velocity of occurrence; elevation of owner; reputational, financial, and operational impact; and indicators of emerging risk as scoring factors to develop an audit plan. The audit plan employs a near-term and mid-term scheduling methodology for the plan, re-examining both risks and the plan on a bi-annual basis.

The audit plan consisted of specific audits scheduled with 20% of available talent hours reserved for Management/Board requests and investigations. However, considerable time spent on requests and investigations caused the need to readjust the audit plan by cancelling audits, as indicated in the audit plan below.
### FY21 Carryforward Audits

<table>
<thead>
<tr>
<th>Audit Description</th>
<th>AR2022-02</th>
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<td>Capital Asset Management</td>
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<td>Contracts Requiring Board of Regents Approval</td>
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<td>Education Resource Center (UH)</td>
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<td>Quality Assurance Reviews - Internal/External</td>
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<td>Research Center Management</td>
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<td>State Benefits Proportionality</td>
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<td>Training Audit</td>
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### Audits/Projects Completed Included on the FY22 Audit Plan

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<thead>
<tr>
<th>Audit Description</th>
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<th>AR2022-08</th>
<th>AR2022-13</th>
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<td>UH Export Controls (FY21 Audit Plan)</td>
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<tr>
<td>UHD Research Governance and Process Overview</td>
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</tbody>
</table>
III. Consulting Services and Non-audit Services Completed

The UHS Internal Auditing Department did not complete any consulting or non-audit services during fiscal year 2022.

IV. External Quality Assurance Review (Peer Review)

The University of Houston System’s Internal Auditing Department’s most recent peer review found the department to Generally Conform to IIA Standards. The June 2018 Report on the Results of the Independent Validation of the Quality Assessment Review (QAR) dated June 2018 may be found in Attachment A. The University of Houston System’s next Quality Assessment Review (QAR) is scheduled for fiscal year 2023.

V. Internal Audit Plan for Fiscal Year 2023

The internal auditing department obtained input from various resources, including senior leadership, risk owners/stakeholders in various areas, and a completed compliance risk assessment to create a risk inventory. We employed an industry standard methodology considering likelihood and velocity of occurrence; elevation of owner; reputational, financial, and operational impact; and indicators of emerging risk as scoring factors to develop an audit plan. The audit plan employs a near-term, mid-term, and long-term scheduling methodology for the plan, re-examining both risks and the plan on a bi-annual basis.

The audit plan consists of specific audits scheduled with 20% of available talent hours reserved for Management/Board requests and investigations. Efficiency improvements that result in additional talent hours will be applied to near-term audits first then to mid-term audits. Internal auditing is currently undergoing skills upgrade processes to integrate additional analytics, computer assisted auditing techniques (CAAT), robotic process automation (RPA) and basic artificial intelligence (AI.).

Please see Attachment B for the Fiscal Year 2023 Audit Plan.

VI. Internal Audit Services Procured in Fiscal Year 2022

<table>
<thead>
<tr>
<th>Audit Area</th>
<th>Services Provided</th>
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<tbody>
<tr>
<td>Athletics</td>
<td>Annual agreed-upon procedures engagement of Intercollegiate Athletics Department.</td>
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<td>Cancer Prevention and Research Institute of Texas</td>
<td>Annual agreed-upon procedures engagement of the Cancer Prevention and Research Institute of Texas.</td>
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<td>Charter School</td>
<td>Annual financial audit of the Charter School.</td>
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<td>Endowment Fund</td>
<td>Annual financial audit of the University of Houston System Endowment Fund.</td>
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<td>Houston Public Media</td>
<td>Annual financial audit of Houston Public Media.</td>
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<tr>
<td>Information Technology Audits</td>
<td>Co-sourced audits of UHS risk-based information technology areas.</td>
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</tbody>
</table>
VII. Reporting Suspected Fraud and Abuse

Actions taken to implement the requirements of:

- Section 7.09. Fraud Reporting, Page IX-38, the General Appropriations Act (87th Legislature).
- Texas Government Code, Section 321.022, Coordination of Investigations.

1) In accordance with Section 7.09. Fraud Reporting, Page IX-38, the General Appropriations Act (87th Legislature):
   a) The home page of each UHS university’s website contains a link which directs the user to the State Auditor’s fraud reporting hotline website.
   b) The home page of each UHS university’s website contains a “Fraud & Non-Compliance Hotline” link which directs the user to each institutions’ vendor supported anonymous reporting hotline.
   c) UHS Administrative Memorandum, 01.C.04., Reporting/Investigating Fraudulent Acts, contains instructions for employees to make anonymous reports of fraud to the State Auditor’s office.

2) UHS Administrative Memorandum, 01.C.04., Reporting/Investigating Fraudulent Acts, requires the Chief Audit Executive to notify the State Auditor’s office of suspected incidents of fraud in accordance with Texas Government Code, Section 321.022, Coordination of Investigations.
Report on the Results
of the Independent Validation of the
Quality Assessment Review (QAR) of University of
Houston System Internal Audit Program
June 2018

Reviewers:
Richard Cordova, CPA
Pamela Doran, CPA, CIA, CISA
Justin Noble, CIA

Submitted to:  Mr. Don Guyton, CPA
Chief Audit Executive
The University of Houston System
June 25, 2018

Mr. Don Guyton, Chief Audit Executive
The University of Houston System
Energy Research Park
5000 Gulf Freeway, Bldg. 3, Room 281
Houston, TX 77204-0930

Dear Mr. Guyton:

We have completed an Independent Validation of the Self-Assessment Quality Assessment Review (QAR) of the University of Houston System Internal Audit Program as required every three years by the Texas Internal Auditing Act (2102) and every five years by the Institute of Internal Auditors International Standards for the Professional Practice of Internal Auditing (Standards). The objectives of the QAR were to:

1. Assess conformance with the IIA Standards;

2. Assess the effectiveness and efficiency of the Internal Audit activity in providing services to the Board of Regents and management of the University of Houston System; and

3. Identify opportunities for improving the Internal Audit Program at the University of Houston System.

Overall, it is our opinion that the University of Houston System Internal Audit Department generally conforms to the IIA Standards, the highest rating available. We noted two opportunities for improvement that could improve the efficiency and effectiveness of the Internal Audit program. These are described in this report.

Sincerely,

Richard Cordova, CPA
Executive Director
Internal Audit
University of Washington
Seattle WA

Pamela Doran, CPA, CIA, CISA
Chief Audit Executive
Audit & Advisory Services
University of South Carolina
Columbia, SC

Justin Noble, CIA
Assistant Chief Audit
Executive
Office of Audit Services
Texas Tech University
System
Lubbock, TX
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- Opinion of Independent Review Team ....................................................................................... 4
- Observations, Opportunities for Improvement and Management Response .......................... 5
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Executive Summary

An Independent Review Team made up of professionals from the University of Washington, University of South Carolina and the Texas Tech University System conducted an independent validation of the Quality Assurance Review self-assessment of the University of Houston System (UHS) Internal Auditing Department. The work was conducted in accordance with the requirements of both the International Standards for the Professional Practice of Internal Auditing (the Standards), and the Generally Accepted Government Auditing Standards (GAGAS).

The UHS Internal Auditing Department utilized and the independent review team assessed the organization using the Institute of Internal Auditors (IIA) Quality Assessment Manual, 2017 Edition. The primary purpose of a Quality Assessment Review is to determine the internal audit function’s conformance with the Standards and GAGAS.

The Texas Internal Auditing Act §2102.0011, Internal Audit Standards, requires the internal audit program to conform to the Standards and the IIA’s Code of Ethics contained in the Professional Practices Framework, and GAGAS. GAGAS requires an external peer review, performed by reviewers independent of the audit organization, to occur at least once every three years. Our review meets the GAGAS requirement.

The UHS Internal Audit Program was determined to Generally Conform to IIA Standards and GAGAS, the highest rating available. We noted certain strengths within the Internal Auditing Department which we feel compelled to acknowledge:

- Well-Established Governance Tone
- Board of Regents and Senior Management Support and Interaction
- Establishment of a Co-sourced IT Audit Function

Additionally, during the course of our work, we identified a few opportunities for improvement within the UHS Internal Auditing Department:

- Formalize Staff Development Processes
- Reduce the frequency of Departmental Reviews

Both of these opportunities are further enumerated within this report along with UHS Internal Auditing’s management response.

Overall, we want to thank the University of Houston System for their hospitality, professionalism and commitment to maintaining a quality and high performing Internal Audit function.
Background and Scope

Background
The University of Houston System (UHS) provides, through the complementary missions of its four universities, access to comprehensive higher education programs and services to the diverse community of students in the Houston metropolitan area and beyond. The Internal Auditing Department conducts independent and objective reviews of university operations and procedures and reports findings and recommendations to the UHS Board of Regents, Chancellor and other executive officers.

UHS Internal Auditing Department
Organizationally, the internal audit function reports directly to the Board of Regents which includes the chief audit executive (CAE) reporting directly to the chair of the Board of Regents Audit and Compliance Committee. The Internal Auditing Department (IAD) has grown from six to twelve professional staff since the employment of the current CAE, 31 years ago.

The UHS IAD is a respected internal audit operation among its higher education peers. Their communication with the Audit and Compliance Committee and UHS’ executive management team is thorough and one to emulate. The IAD has also been a catalyst for the establishment and use of the departmental self-assessment tool, which is found on its website.

IIA Standards – Validation of a Self-Assessment
This Validation of the QAR Self-Assessment of the UHS IAD was performed in accordance with The Institute of Internal Auditors (IIA) International Standards for the Professional Practice of Internal Auditing (the Standards) utilizing the IIA’s Quality Assessment Manual, 2017 Edition. The primary purpose of a Quality Assessment is to determine the internal audit function’s conformance with the Standards. There are three possible outcomes of the QAR: the internal audit program generally conforms, partially conforms or does not conform with the Standards.

Conformance with IIA Standards
Generally Conforms means that IAD has a charter, policies and processes that are judged to meet the spirit and intent of the IIA Standards with some potential opportunities for improvement.

Partially Conforms means deficiencies in practice are noted that are judged to deviate from the spirit and intent of IIA Standards, but these deficiencies did not preclude IA from performing its responsibilities in an acceptable manner.

Does Not Conform means deficiencies in practice are judged to be so significant as to seriously impair or preclude IA from performing adequately in all or in significant areas of its responsibilities.
Additionally, the Texas Internal Auditing Act §2102.0011, Internal Audit Standards, requires the internal audit program to conform to the Standards and the IIA’s Code of Ethics contained in the Professional Practices Framework, and Generally Accepted Government Auditing Standards (GAGAS). GAGAS requires an external peer review, performed by reviewers independent of the audit organization, to occur at least once every three years. Our review meets that GAGAS requirement.

Scope

We conducted the validation of the Self-Assessment during the month of May 2018. The UHS Internal Auditing Department supplied the review team with the materials noted below in early May and we then conducted on-site procedures from May 21-24, 2018.

Engagement Methodology

Our procedures included review of the following documents:

- Audit Charter and other background/organizational materials regarding UHS and the internal audit program
- The charter for the UHS Board of Regents (BOR) Committee on Audit and Compliance
- UHS BOR Section V-Audit and Compliance, Policies 41.01-41.01.04
- Texas Government Code, Chapter 2101.001-Texas Internal Auditing Act
- System Administrative Memoranda (SAMs) 04.A.02-Audits by Internal Auditing
- QAR advanced preparation materials providing background on the internal auditing program and practices
- The annual audit plan and risk assessment process
- Selected internal audit project workpapers and reports
- Staff training histories
- Audit follow-up practices and reporting
- Results of a survey completed by audit clients

The on-site procedures included:

- Interview with the Chairperson of the UHS BOR Audit and Compliance Committee
- Interview with the UHS Chancellor
- Interviews with UHS Internal Auditing Department staff and UHS officials
- Analysis of the information reviewed and an assessment of compliance with the Standards
Opinion of Independent Review Team

Overall, the UHS Internal Auditing Department was judged to Generally Conform to IIA Standards, the highest rating available. While improvement opportunities remain in various areas, they did not preclude this assessment. We concluded the following individual standards Generally Conform to the IIA Standards:

1000—Purpose, Authority and Responsibility
1100—Independence and Objectivity
1200—Proficiency and Due Professional Care
1300—Quality Assurance and Improvement Program
2000—Managing the Internal Audit Activity
2100—Nature of Work
2200—Engagement Planning
2300—Performing the Engagement
2400—Communicating Results
2500—Monitoring Progress
2600—Communicating the Acceptance of Risks
Strengths, Opportunities for Improvement and Management Response

UHS Internal Audit Program Strengths

- **Governance**—UHS CAE reports to the BOR Chair of the Audit and Compliance Committee. Executive sessions are held between the committee and the CAE, which evidences independence. Additionally, the CAE meets monthly with the Chair as well as the Chancellor/President and senior leaders throughout the System to discuss internal audit operations. These activities definitely demonstrate a best practice which all peer reviewers would recommend to their own institutions!

- **Board of Regents and Senior Management Support and Interaction**—Our interviews conveyed a high level of support for the IAD from the BOR of the UHS and senior management. The Internal Audit program is well respected and seen as collaborative; management feels comfortable seeking their opinion of problematic situations. The Internal Auditing Department at UHS is truly seen as a “trusted advisor”.

- **Establishment of a Co-sourced IT Audit Function**—Our work identified that the Internal Auditing Program had established since the last QAR, the use of a co-source partner to provide certain IT Audit skills. In a time when maintaining extensive and ever changing IT skill sets is a challenge for internal audit departments, UHS has moved to leverage outside experience and by all accounts the experience has been a positive one.

Opportunities for Improvement—Internal Auditing Department

- **Formalize Staff Development**
  
  During interviews with Internal Auditing Management and Staff, we learned that even though the management team supports the team’s growth and training to maintain minimum standards required by the IIA, a more formal Staff Development Plan at all levels will improve the opportunities provided and employee satisfaction. This would include:

  - Plans for the CAE to provide senior level staff with more exposure to the BOR and continue to provide greater opportunities for them to demonstrate their skills to senior management;
  - Plans for development of the audit staff and seniors in a manner which will provide them with the opportunity to be recognized as Subject Matter Experts and Principal Auditors, which could include encouraging and supporting certifications; and,
  - Plans to provide staff members at all levels the opportunity to participate in Management Development Training Programs, which will prepare high performing individuals with opportunities to move into management both within the Internal Auditing Department or elsewhere on campus.

  **INTERNAL AUDITING DEPARTMENT’S RESPONSE:**

  We have already included the Executive Director in the meetings with the Chair of the Audit and Compliance Committee and the Chancellor. The Executive Director will also begin making presentations at the Audit and Compliance Committee meeting. Audit staff will be invited to the Audit and Compliance Committee meeting when their projects are discussed.
In order to further develop audit staff, we will identify skills/competencies required for each audit staff position. We will begin assessing audit staff against these skills/competencies and provide cross-training opportunities and formal training, as appropriate. As audit staff obtain the required skills/competencies, they will have opportunities to become recognized as Subject Matter Experts in various areas, including departmental reviews, information technology, and data analytics. In addition, we will encourage audit staff to pursue professional certifications and will stress the importance of professional certifications in performance evaluations.

In addition, we will work with the Human Resources Department to identify training opportunities for audit staff at all levels, including Management Development Training Programs for high performing audit staff.

We expect to have all of these areas addressed by September 1, 2019.
Consider Reducing Departmental Reviews
Review of the Internal Auditing program and the Internal Audit Annual Planning Documents provided to Senior Management and the BOR highlighted that a substantial amount of time has been devoted over the last five years to Departmental Reviews. While these reviews have provided valuable information on the operating challenges faced within many departments, the reviews have appeared to lose a risk-based approach and have evolved to become somewhat rotational in nature.

We believe there is an opportunity to move to a more “risk based approach” to conduct these Departmental Reviews and use the gained time to focus on audits that evaluate the controls in UHS Strategic Priorities (such as the coming Medical School) and key higher risk programs and initiatives. This would include operational reviews related to major activities at each of the institutions. This gained time could also allow the department to participate in more activities of an “advisory” nature, when requested.

INTERNAL AUDITING DEPARTMENT’S RESPONSE:

We are in the process of streamlining departmental reviews to be more risk based. We expect to reduce the amount of hours expended on these reviews by increasing the use of data analytics and by eliminating audit procedures associated with low risk areas. The time gained by reducing effort on departmental reviews will be used to perform higher risk based audits, such as UHS Strategic Priorities and operational reviews of system-wide functional areas. We expect to streamline our departmental review process by January 31, 2019.
Appendices

Appendix I
As we conducted our interviews of the executive management team, we kept note of key words and phrases used to describe the Internal Auditing Department. Below is a word map which captures the major themes and frequency of those words heard during these interviews. Additionally, the word map demonstrates respect and professionalism that the department provides to all campuses.
Appendix II

Interviews Conducted:

**Board of Regents**
Mr. Roger F. Welder, Outgoing Audit and Compliance Committee, chair
Peter Taaffe, Audit and Compliance Committee, chair

**Senior UHS Management**
Dr. Renu Khator, Chancellor/ President
Dr. Paula Short, Senior Vice Chancellor/Senior Vice President
Mr. Jim McShan, Senior Vice Chancellor/ Vice President of Administration and Finance
Ms. Dona Cornell, Vice Chancellor/ Vice President Legal Affairs/General Counsel
Dr. Richard Walker, Vice Chancellor for Student Affairs/Vice President Student Affairs
Dr. Dennis Fouty, Associate Vice Chancellor and Chief Information Officer
Ms. Joan Nelson, Assistant Vice Chancellor / Vice President Human Resources
Ms. Cris Milligan, Assistant Vice President Research Administration
Ms. Lauren DuBois, Senior Associate Athletic Director

**UHS Internal Auditing Department**
Mr. Don Guyton, Chief Audit Executive
Mr. Russ Hoskens, Executive Director
Mr. Randy Wong, Manager
Mr. Jeff Collier, Senior Auditor
Ms. Dia Mobe, Senior Auditor
Mr. Tony Moreno, Senior Auditor
Ms. Brandee O’Neal, Senior Auditor
Ms. Connie Applebach, Staff Auditor II
Ms. Tamara Davis, Staff Auditor II
Mr. Eric Porter, Staff Auditor II
Mr. Emily Tran, Staff Auditor II
Mr. Eric Wright, Schneider Downs & Co. Inc. Partner – Co-Source Service Provider IT Audit
Appendix III

Results of Surveys

Survey of UHS Executives evaluating the Internal Auditing Program

The Executive Survey asked questions related to the professionalism and conduct of the UHS Internal Auditing Program. The scale of the survey was 1 – 4 and all scores averaged from 3.48 to 3.72. Please note that a total of 29 executives responded to the Survey out of the 30+ surveys sent out – an excellent response rate of 97%.
Appendix III (cont.)

Survey of the Internal Auditing Team

The Survey of the Internal Auditing Management and Staff included over 30 questions. We have included the top five scoring questions and lowest five scoring questions. We received responses on the Staff survey from all Internal Auditing Management and Staff with the exception of the CAE (as planned).
Annua\ll Internal Audit Plan and Peer Review Status
FY 2023

August 25, 2022
Overview

1. Internal Audit Definition

2. Staff Members and Certified Competencies

3. Proposed Audit Plan

4. Additional Points
Definition of Internal Auditing

“Internal auditing is an independent, objective assurance and consulting activity designed to add value and improve an organization's operations. It helps an organization accomplish its objectives by bringing a systematic, disciplined approach to evaluate and improve the effectiveness of risk management, control, and governance processes.”
## Staff Members and Certified Competencies

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<th>Name</th>
<th>Job Title</th>
<th>Certifications</th>
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<td>White, Barbara Carol</td>
<td>Asst, Administrative, Exec</td>
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<td>Dahlke, Sandra Wells</td>
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<td>CAP</td>
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<td>McClellan, Elias Jacob</td>
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<td>Gerry, Kim A.</td>
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<td>Johnnie Buoy</td>
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</tr>
<tr>
<td>Hurd, Phillip Wayne</td>
<td>Chief Audit Executive</td>
<td>CIA, CISSP, CCEP</td>
</tr>
</tbody>
</table>
### Existing Year Projects that are in Process

<table>
<thead>
<tr>
<th>TITLE</th>
<th>STATUS</th>
<th>COMMENTS</th>
</tr>
</thead>
<tbody>
<tr>
<td>Procurement Card Management (UH, UHCL, UHD and UHV)</td>
<td>Project Currently In progress</td>
<td>In fieldwork</td>
</tr>
<tr>
<td>Research Governance and Process Overview (UH and UHCL)</td>
<td>Project Currently In progress</td>
<td>In fieldwork (UH) and In reporting (UHCL)</td>
</tr>
<tr>
<td>Travel Expense (UH, UHCL, UHD, and UHV)</td>
<td>Project Currently In progress</td>
<td>In fieldwork</td>
</tr>
<tr>
<td>Education Resource Center (UH)</td>
<td>Project Currently In progress</td>
<td>In fieldwork</td>
</tr>
<tr>
<td>Compliance Program Analysis (UH, UHCL, UHD and UHV)</td>
<td>Project Currently In progress</td>
<td>In reporting</td>
</tr>
<tr>
<td>Travel &amp; Entertainment Expenditures - Board, FY22</td>
<td>Project Currently In progress</td>
<td>Board Requested - Continual - Report in November</td>
</tr>
<tr>
<td>Travel &amp; Entertainment expenditures - President, FY22 (UH, UHCL, UHD, and UHV)</td>
<td>Project Currently In progress</td>
<td>Board Requested - Continual - Report in November</td>
</tr>
<tr>
<td>Contracts Requiring Board Approval</td>
<td>Project Currently In progress</td>
<td>In fieldwork</td>
</tr>
<tr>
<td>Houston Public Media - Financial Statement Review</td>
<td>Project Currently In progress</td>
<td>In planning</td>
</tr>
<tr>
<td>Lab Safety (UH, UHCL, and UHD)</td>
<td>Project Currently In progress</td>
<td>In fieldwork</td>
</tr>
<tr>
<td>IA Data Analytics and Value Enhancements</td>
<td>Project Currently In progress</td>
<td>This is on ongoing skills enhancement project to integrate data analytics and increase sample size through integration of AI and RPA into the audit process.</td>
</tr>
<tr>
<td>ENGAGEMENT TITLE</td>
<td>GROUPING</td>
<td>TYPE</td>
</tr>
<tr>
<td>------------------------------------------------------</td>
<td>---------------------------</td>
<td>--------------------------</td>
</tr>
<tr>
<td>Title of the audit engagement.</td>
<td>Assurance Blended Consulting Special Project</td>
<td>Compliance Financial Information Technology Investigation Operational</td>
</tr>
<tr>
<td>Annual Procurement Report</td>
<td>Assurance</td>
<td>Compliance</td>
</tr>
<tr>
<td>Athletics - Football Attendance</td>
<td>Assurance</td>
<td>Compliance</td>
</tr>
<tr>
<td>Board of Regents Travel &amp; Entertainment, FY 2023</td>
<td>Assurance</td>
<td>Compliance</td>
</tr>
<tr>
<td>Chancellor/President’s Travel &amp; Entertainment, FY 2023</td>
<td>Assurance</td>
<td>Compliance</td>
</tr>
<tr>
<td>Contracts Requiring Board of Regents Approval</td>
<td>Assurance</td>
<td>Compliance</td>
</tr>
<tr>
<td>Compliance with Education Code 51.9337</td>
<td>Assurance</td>
<td>Compliance</td>
</tr>
<tr>
<td>Fiscal Controls and Cost Center Management</td>
<td>Mgt. Request</td>
<td>Compliance</td>
</tr>
<tr>
<td>HIPPA Compliance</td>
<td>Assurance</td>
<td>Compliance</td>
</tr>
<tr>
<td>NCAA-Rules Compliance</td>
<td>Assurance</td>
<td>Compliance</td>
</tr>
<tr>
<td>PeopleSoft/Banner Data Integrity</td>
<td>Mgt. Request</td>
<td>Information Technology</td>
</tr>
<tr>
<td>Clinical Health Services</td>
<td>Mgt. Request</td>
<td>Compliance</td>
</tr>
<tr>
<td>Research Data Security</td>
<td>Mgt. Request</td>
<td>Compliance</td>
</tr>
<tr>
<td>Quality Assurance Reviews - Internal/External</td>
<td>Assurance</td>
<td>Compliance</td>
</tr>
<tr>
<td>Scholarships and Financial Aid</td>
<td>Assurance</td>
<td>Compliance</td>
</tr>
<tr>
<td>State Benefits Proportionality</td>
<td>Assurance</td>
<td>Compliance</td>
</tr>
<tr>
<td>Education Resource Center (UH)</td>
<td>Assurance</td>
<td>Compliance</td>
</tr>
</tbody>
</table>
Additional Points

• 20% of available talent hours are reserved for Management/Board requests and investigations.

• Improvements in efficiencies which result in additional talent hours will be applied to near-term audits first, then to mid-term audits.

• Internal audit will go through a peer review in FY 2023.