

**UNIVERSITY OF COLORADO
DEPARTMENT OF INTERNAL AUDIT
2018 AUDIT PLAN
As of June 1, 2017**

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Appendix A – Initial 2018 Audit Schedule

**UNIVERSITY OF COLORADO
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I. Purpose

The University of Colorado's Department of Internal Audit (Internal Audit) plan for fiscal year 2018 is provided for the information and consideration of the Board of Regents and its audit committee (Regents), university leadership, and other constituents of the university. The plan's primary purpose is to convey Internal Audit's role, objectives, and goals underlying its intent to make a valuable contribution to the university's continued success over the coming fiscal year.

This document is part of an ongoing plan that requires continual monitoring and revision as conditions warrant. The continued support of the Regents, leadership, and other constituents in developing this plan is greatly appreciated.

II. Internal Audit's Role, Objectives and Operational Strategy

Role and Objectives

As set forth in its charter, Internal Audit's role is to provide independent, objective assurance, consulting and educational activity designed to add value and improve the university's operations. Internal Audit helps the university accomplish its objectives by bringing a systematic, disciplined approach to the evaluation and improvement of university processes related to university-wide risk management, control, and governance.

More specifically, Internal Audit evaluates whether university processes, as designed and represented by management, are adequate and functioning in a manner to help ensure the following university objectives are achieved:

- risks are appropriately identified and managed,
- interaction with various constituents occurs as needed,
- significant financial, managerial, and operational information is accurate, reliable, and timely,
- employees' actions are in compliance with policies, standards, procedures, and applicable laws and regulations,
- resources are acquired and used in a reasonably economical and efficient manner, and are adequately protected,
- programs, plans, and objectives are achieved,
- quality and continuous improvement are fostered in the university's control processes, and
- significant legislative or regulatory issues impacting the university are recognized and addressed appropriately.

Operational Strategy

Activities

Internal Audit accomplishes its role and objectives by performing the following:

- 1) Audits - independently evaluate whether operational processes are supporting university objectives as intended and identify ways to improve those processes.
- 2) Investigations - gather, analyze, and present information related to allegations of fiscal misconduct.
- 3) Assessments - gather, analyze, and independently evaluate whether programs and initiatives are accomplishing university objectives sufficient to meet the applicable requirements.
- 4) Consultations - participate on committees or engage in other advisory services to provide information and advice to management.
- 5) Education - provide informal and formal opportunities to help the university community understand and use sound business practices to achieve its objectives, particularly those that mitigate the risk of error and misuse.

Deliverables

During the course of a year, Internal Audit delivers a number of formal or informal communications to assist the Regents and management in identifying and mitigating risks and improving operations. The nature of the work in progress at the time the issue is identified and/or the level of perceived risk associated with the issue will generally dictate the form of communication utilized. Internal Audit assigns a risk rating to each audit based on the likelihood and impact of negative outcomes in order to convey an understanding as to the relative significance of the issues to the unit or area involved, as well as the university as a whole. Each assessed rating of high, moderate or low, is determined using agreed-upon criteria. Communications typically take on the characteristics identified below.

Formal Communications:

Audit Report - issued during or at the conclusion of an audit project; addressed to the president and/or campus chancellor as appropriate; generally utilizes balanced reporting (i.e., identifies both strengths as well as risks identified for the unit) to help ensure audit results are fairly presented; final reports include management's responses and action plans with respect to the issues identified.

Specific Issues Report - issued whenever an issue(s) is identified that is of sufficient risk to trigger reporting to senior management, but may not be directly within the specific scope of an audit. Specific Issues reports are issued to a level of senior management appropriate to where the issue resides, although typically to the president or campus chancellor. These reports also include management's response and action plan with respect to the issue(s) identified.

Investigation Report - issued at the conclusion of an investigation of employee fiscal misconduct. These reports provide facts and evidence relevant to the policy, rule or law that may have been violated as a result of the conduct alleged and are typically addressed to the individual's appointing authority.

Management Advisory – a memorandum issued to an appropriate level of management and used to report audit issues of relatively lesser impact or scale, or to advise management as the result of consultative services. Although suggested actions may be included in the report, no management response or action plan is incorporated.

Regulatory Reports – a letter or other communication to convey the results of a review conducted in accordance with the requirements of an external regulatory body.

Compliance Assessment – issued during or at the conclusion of a compliance review and are used to report issues related to gaps in compliance programs or identified opportunities for implementing best practices; includes management's response and action plan when gaps are identified.

Informal – includes emails, memoranda or verbal reports to communicate relatively lower risk issues, as well as educational presentations.

Audit Project Planning

Internal Audit maintains an ongoing planning process during the year to help determine the extent to which, and in what areas it intends to expend its efforts the following year. In fiscal year 2014, Internal Audit transitioned from an annual approach to a semi-annual approach to planning its audit and consulting activities. This approach gathers information throughout the year utilizing such methods as interviewing university managers, communicating with peers and professional organizations regarding higher education risks in general, observing and understanding university operations, and soliciting information from senior management personnel. Internal Audit assesses risks and compiles a list of potential audits to consider for each ensuing six-month period, allowing for a more timely response to changes in the risk environment and increasing the department's ability to allocate resources for special requests. A list of potential audits and consulting projects is continuously reviewed with university leadership and the Regent Audit Committee to establish the prioritization of future Internal Audit activity.

Strategic Planning

Beginning in fiscal year 2018, Internal Audit will provide the Regent Audit Committee with a strategic plan that extends out over five years. This report will encompass Internal Audit's long-term plans in the areas of organizational structure and how Internal Audit will identify and address current and future risks facing the university.

III. Challenges and Opportunities

Several significant factors are considered in determining the application of Internal Audit resources for the benefit of the university.

Complexity and Size of the University

Internal Audit is responsible for providing assurance and related services university-wide. Analysis of the university's audit universe reveals the existence of a dynamic multitude of business objectives and activities. These objectives and activities serve to support the university's vision and campus-based missions, in service both to, and on behalf of, a wide variety of constituents. As the state's flagship higher education institution, the university is subject to the rigorous scrutiny of interested media, legislators, and the public at large. Striving for continued recognition as being among the top higher education and research institutions in the country demands high quality faculty, services and commitments under collaborative, contractual relationships with non-university entities. Significant federal funding for financial aid and research also brings external mandates. Finally, donors provide significant funding, which finances specific activities and drives outcomes and expectations but can also include mandates and the associated risks.

Authority and responsibility for university operations are largely decentralized and widely distributed, spanning system administration and four campuses, with extensive processes, activities, and units. While many university-wide business processes exist with respect to the university's financial, legal and student systems, numerous sub-processes and other unique approaches exist to accomplish the university's wide variety of business forms in pursuit of its missions and objectives. All organizational units have varying degrees of influence on the success of the various processes, depending on their roles, attitudes, and abilities to fulfill them. The wide distribution and variation of responsibility and activities across the university is a challenge to attaining sufficient audit coverage to provide an adequate level of assurance to ensure university objectives are achieved.

Degree of Change and Resource Limitations in the University Environment

The university is in a continual state of change. Competition for donations and research funding is increasing and constituent expectations are more demanding. These changing external influences require constant monitoring to assess their impact, ensure continued compliance with relevant requirements, and recognize opportunities to increase the university's value.

Constantly increasing deployment and reliance on information technology, through both on premise and growing third-party service solutions, creates highly impactful risks to university objectives. The distributed, open architecture of university information technology systems and networks, combined with a mobile and collaborative global constituency, create a challenging risk environment subject to many diverse threat sources and vulnerabilities. Complexity due to the diversity of services, research objectives, and independent activities, demands commodity information technology service pricing with customized service expectations, requiring both university-wide coordination and integration to avoid redundancy and excessive costs, and adaptable local service approaches. The resulting environment is a target-rich collection of high-performance and high-capacity systems, valuable private data sources requiring sophisticated protection, complex collaborations with other educational and research institutions, and valuable intellectual property.

Internal Audit Resource Base

Internal Audit will begin fiscal year 2018 fully staffed with the associate vice president, one internal audit services director, one IT audit services director, six audit managers, one investigations senior audit manager, one investigations audit manager, one compliance audit manager, one senior IT audit manager, one IT audit manager, one IT audit specialist, and one professional assistant.

Internal Audit Quality Assurance Review Recommendations

The Quality Assurance Review (QAR) of the Internal Auditing function completed in April 2009 found that Internal Audit generally conforms to The Institute of Internal Auditors' *International Standards for the Professional Practice of Internal Auditing*, with one exception related to the timely performance of the external quality assessment. Its report identified several commendable practices and made recommendations, which included utilizing additional performance metrics and computer tools. To comply with the standards, Internal Audit would have had to schedule a QAR for fiscal year 2015. However, due to the significant changes made in the structure and practices of the department, Internal Audit received a two-year deferral from the Regent Audit Committee. This will allow for the review to cover fiscal year 2015 and fiscal year 2016; years where departmental changes will be included in Internal Audit policies, procedures and work product. The review will take place in 2017.

IV. Fiscal Year 2018 Operational Objectives and Goals

The following objectives and goals for Internal Audit have been established to guide the department in its effort to provide meaningful and responsive internal auditing services to the university in support of its objectives.

Continue to Cultivate Relationships and Understanding: Focus on Value and Risk

Communications with various members of executive and senior management at system administration and the campuses will continue to help Internal Audit better understand management's objectives, goals and risk tolerance, and integrate its efforts with management's strategic plans. These communications will occur through planning meetings with executive management, through periodic informational meetings with key executive management personnel, the conduct of entrance and exit conferences during audits, maintaining a high level of management communication throughout each project, and by providing educational presentations to various campus and system administration audiences. Internal Audit will work to provide services focused on value and risk. Finally, Internal Audit will continue to be responsive to management requests for assistance in a manner consistent with Internal Audit's mission and professional responsibility.

Regent Audit Committee Support

Ongoing communication with the chair of the Regent Audit Committee and executive management will occur to assist in Regent Audit Committee agenda coordination and delivery to ensure the committee effectively accomplishes the activities set forth in its work plan. Internal Audit will assist in revising the committee's work plan to ensure it is consistent with leading practices in the public higher education environment. Internal Audit will work with the committee and management as the need arises to further delineate the roles and responsibilities of the Regent Audit Committee, management and the audit

function. The accomplishment of these objectives will be assessed in the Regent Audit Committee's annual self-review of its work plan.

Delivery of Audit, Investigation, and Advisory Services

Allocation of Effort

Internal Audit forecasts its allocation of hours between direct and indirect effort, based on the expectations for each position. For fiscal year 2018, Internal Audit will use percentages consistent with historical experience, forecasting 67% for direct project effort, 16% for administrative effort and 17% for leave and other compensated absences. See the table below.

Direct Effort:	
Audits, Consultations, Follow-ups, and Management Requests	51.50%
Investigations	11.50%
Education Activities	<u>4.00%</u>
Subtotal, Direct Effort	67.00%
Indirect Effort:	
Department, Administration, Professional Development, University and Community Outreach	
Subtotal, Indirect Effort	16.00%
Compensated Absences	<u>17.00%</u>
Total Allocation of Effort	100.00%

The allocation of actual effort incurred for any given fiscal year, as compared to that forecast for the year, will be shown in Internal Audit's Annual Report for the year. This report will be issued after the end of the fiscal year and presented to the Regent Audit Committee in the fall.

Initial Fiscal Year 2018 Audit Schedule

In developing the initial fiscal year 2018 audit schedule, several factors were considered, including, but not necessarily in order of importance:

- * broad public research institution objectives,
- * university vision, goals, and objectives,
- * significant internal and external operating environment changes, primarily compliance issues,
- * management input,
- * relative risk of audit topics as compared to the university as a whole,
- * recent indicators of performance concerns,
- * balance of audit activities to provide coverage across the university,
- * changes in trends in external risk factors,
- * stages of development within the university,
- * compliance requirements and the related programs and initiatives designed to achieve compliance,
- * other traditionally recognized risk influences, and
- * audit resources available.

The audit schedule identifies audits and consultations projected to be in process as of the end of fiscal year 2017, as well as the audits proposed to commence and be completed in the first two quarters of fiscal year 2018.

Flexibility is an inherently accepted part of the audit plan to accommodate management requests and other unanticipated priorities that may arise throughout the year. Because of these factors, time is reserved for unplanned activity.

Unless input received during the June 12, 2017, Regent Audit Committee meeting indicates otherwise, Internal Audit will adopt the audit schedule in directing its efforts in fiscal year 2018. The percentage of completion of the audit schedule will be presented in Internal Audit's annual report, to be issued after the end of the fiscal year and presented to the Regent Audit Committee in the fall.

Consultations to the Board of Regents, Management, and Other Constituents

Internal Audit will be responsive to management requests for advisory services. It will also continue to seek opportunities to become involved in planning committees, policy and guideline development, and other university strategic efforts in order to promote internal controls, quality processes, and the alignment of resources early in the planning and implementation stages. The up-front involvement of audit expertise as processes, policies, and procedures are developed provides an opportunity for proactive risk mitigation before they become operational. Earlier introduction of sound business practices will reduce rework, retraining, and constituent dissatisfaction.

As maintenance of objectivity is essential, Internal Audit's consultative services will not include active decision-making and implementation, but rather the contribution of meaningful data and insight to those charged with making decisions and implementing them.

In addition, should any significant issues be identified during the course of advisory services that warrant notification to a level of management above the level for which the services are provided, Internal Audit is obligated to inform the appropriate level of management, which may include the Regent Audit Committee.

Enhance Audit Resources

In 2014, Internal Audit re-organized by delegating to the two directors and selected audit managers some of the administrative duties previously carried out by the associate vice president. This served to improve efficiencies and provide for cross training and succession planning. Internal Audit also continues to address enhancing its documentation by utilizing computer-assisted tools to a greater degree.

Through continued practice, professional education, and networking, Internal Audit will work to enhance its professional knowledge and skills such that they may be applied for the benefit of the university in the delivery of services. Such efforts will include a continued focus on maintaining and, where possible, increasing its knowledge base in university operations, industry risks, information technology, investigations, and federal compliance.

V. Fiscal Year 2018 Financial Resources

Internal Audit’s anticipated fiscal year 2018 budget is as follows, with comparison to the fiscal year 2017 budget:

<u>Type of Expense</u>	<u>2017 Budget</u>	<u>2018 Budget Request</u>	<u>Percent change</u>
Professional Salaries	\$1,708,662	\$1,751,379	2.50% ⁽¹⁾
Student Intern	11,120	11,120	0.00%
Benefits	*	*	
Salary Savings Rollover	46,000	15,000	0.00%
Operating Expenses	<u>113,464</u>	<u>113,464</u>	<u>0.00%</u>
Total	<u>\$1,879,246</u>	<u>\$1,890,963</u>	<u>2.50%</u>

(1) 2018 difference

Merit increases	\$42,717
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* Benefits are coordinated from a central pool within system administration.

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Projects Carried over from FY2017

CU Boulder	Performance/Compliance	Athletics - Football
CU Anschutz	Compliance - IT	HIPAA Compliance
CU Boulder	Performance/Compliance	JILA
CU Anschutz	Performance/Compliance	Sheridan Health Services
UCCS	Performance/Compliance	College of Education

Projects to be Commenced in Q1 and Q2 FY2018

<u>Campus</u>	<u>Type</u>	<u>Area of Focus - Objective</u>
CU Anschutz	Financial/Performance	AHEC – Regional Centers
CU Anschutz	Compliance	School of Medicine – Grant Audits
CU Boulder	Compliance - IT	IT Export Management
CU Boulder	Compliance	Export Control Follow-up
CU Denver	Compliance - IT	ePayment Processing Assurance
CU Denver	Performance/Compliance	College Audit
CU Denver	IT Consultation	CU South Denver
UCCS	Consultation	Auxiliary Accounting
UCCS	Compliance - IT	ePayment Processing Assurance
UCCS	Compliance	Grant Audit
UCCS	Compliance	Grant Audit
System	Consultation	Laws and Policies
System	Performance/Compliance - IT	IT Security Framework
System	Compliance	Internal Audit QAR I
System	Compliance	Internal Audit QAR II