



University of Colorado

Boulder | Colorado Springs | Denver | Anschutz Medical Campus

INTERNAL AUDIT

FY26 Internal Audit Plan

June 18, 2025





Our purpose is to strengthen the university's ability to create, protect, and sustain value by providing the Board of Regents and university management with independent, risk-based, and objective assurance, advice, insight, and foresight.

We carry out our mandate by bringing a systematic, disciplined approach to evaluating and improving the effectiveness of governance, risk management, and control processes across the university system.

We strive to enhance CU's:

- successful achievement of objectives;
- governance, risk management, and control processes;
- decision-making and oversight;
- reputation and credibility with its stakeholders; and
- ability to serve the public interest.

Our Purpose

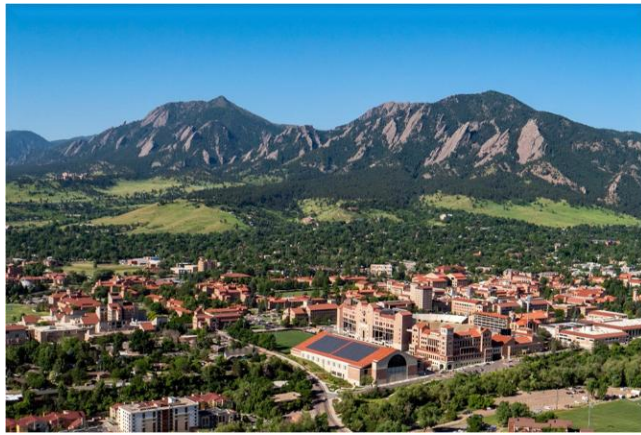


University of Colorado

Boulder | Colorado Springs | Denver | Anschutz Medical Campus

INTERNAL AUDIT

Our Vision: Insight with Impact



We are trusted partners.

We deliver timely and relevant perspective on risks and opportunities.

We are committed to our core values, intellectual curiosity, and alignment with our stakeholders.



University of Colorado

Boulder | Colorado Springs | Denver | Anschutz Medical Campus

INTERNAL AUDIT

Global Internal Audit Standards

The Institute of Internal Auditors Standards and the CU Internal Audit Charter require us to:

- Create a plan that supports the achievement of the organization's objectives
- Base the plan on a documented assessment of the organization's strategies, objectives, and risks
- Support the evaluation and improvement of the organization's governance, risk management, and control processes
- Consider coverage of information technology governance, fraud risk, the effectiveness of the organization's compliance and ethics programs, and other high-risk areas
- Discuss planned services and resource requirements with leadership and the Board
- Be **dynamic, insightful, proactive, and future-focused** in response to emerging risks and changes in organization's operations, controls, and culture

CU Internal Audit Plan Objective: Be Relevant & Agile



- Support CU strategic objectives and campus priorities
- Effectively pivot to address emerging priorities in addition to ongoing institutional risks
- Collaborate with other CU risk-monitoring and assurance functions to reduce redundancy and streamline efforts
- Create a plan that is risk-based, flexible, and right-sized for our team's capacity and capabilities
- Engage with higher education peers to bring valuable experience and perspective on effective internal control environment and risk management
- Provide *Insight with Impact*

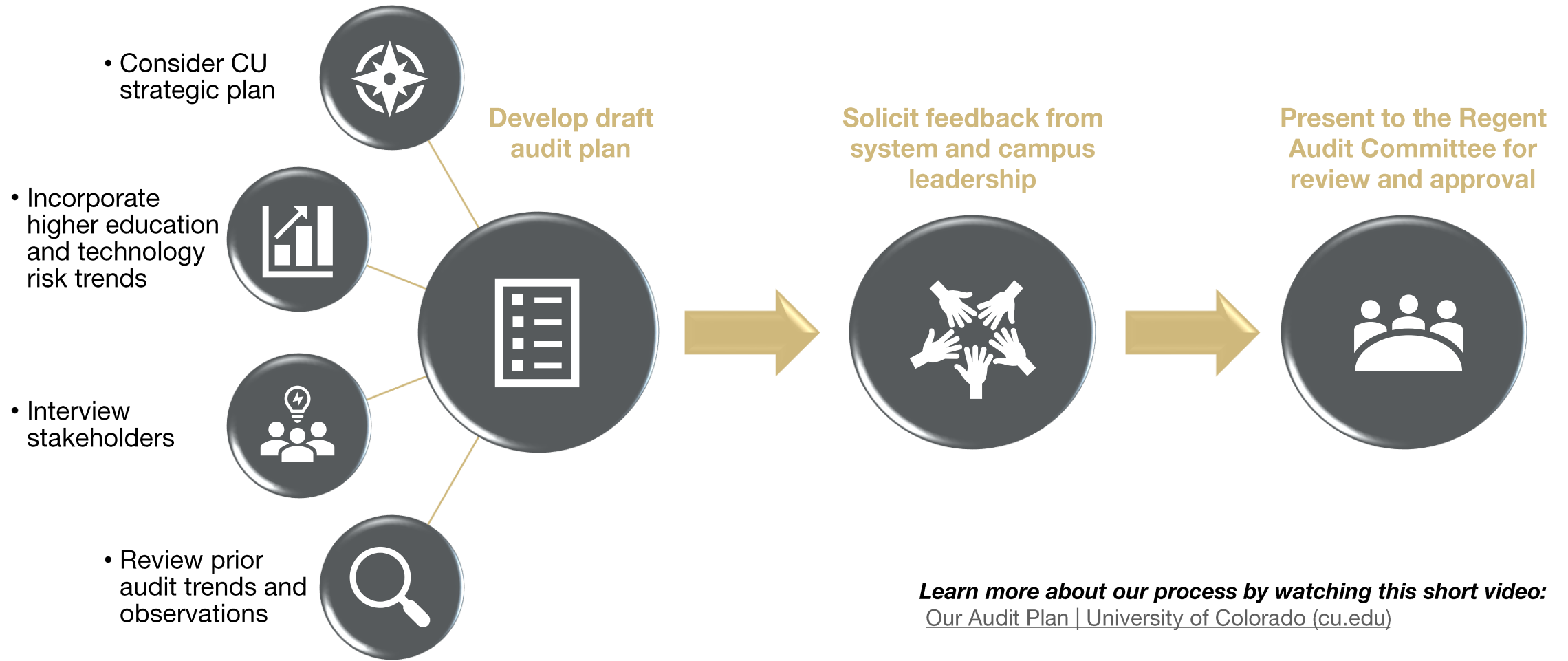


University of Colorado

Boulder | Colorado Springs | Denver | Anschutz Medical Campus

INTERNAL AUDIT

Internal Audit Plan Development Process



Learn more about our process by watching this short video:
[Our Audit Plan | University of Colorado \(cu.edu\)](#)

CU 2021-2026 Strategic Plan



Affordability & Student Success

The University of Colorado is devoted to helping our students reach their full potential. The focus areas within this pillar encourage the intellectual, personal and professional development of our students.



Discovery & Impact

At the University of Colorado, we believe research and healthcare are keystones to advancing knowledge, inspiring innovation, fostering creativity and improving the quality of life for Coloradans.



Diversity, Inclusion, Equity & Access

The University of Colorado celebrates and recognizes the strength of diverse communities and perspectives. We are committed to creating an inclusive culture in pursuit of our goals of excellence and meeting the needs of the state, nation and world.



Fiscal Strength

The University of Colorado focuses on improving policies, procedures and practices to ensure current and future sustainability, highlighting financial management and risk management.

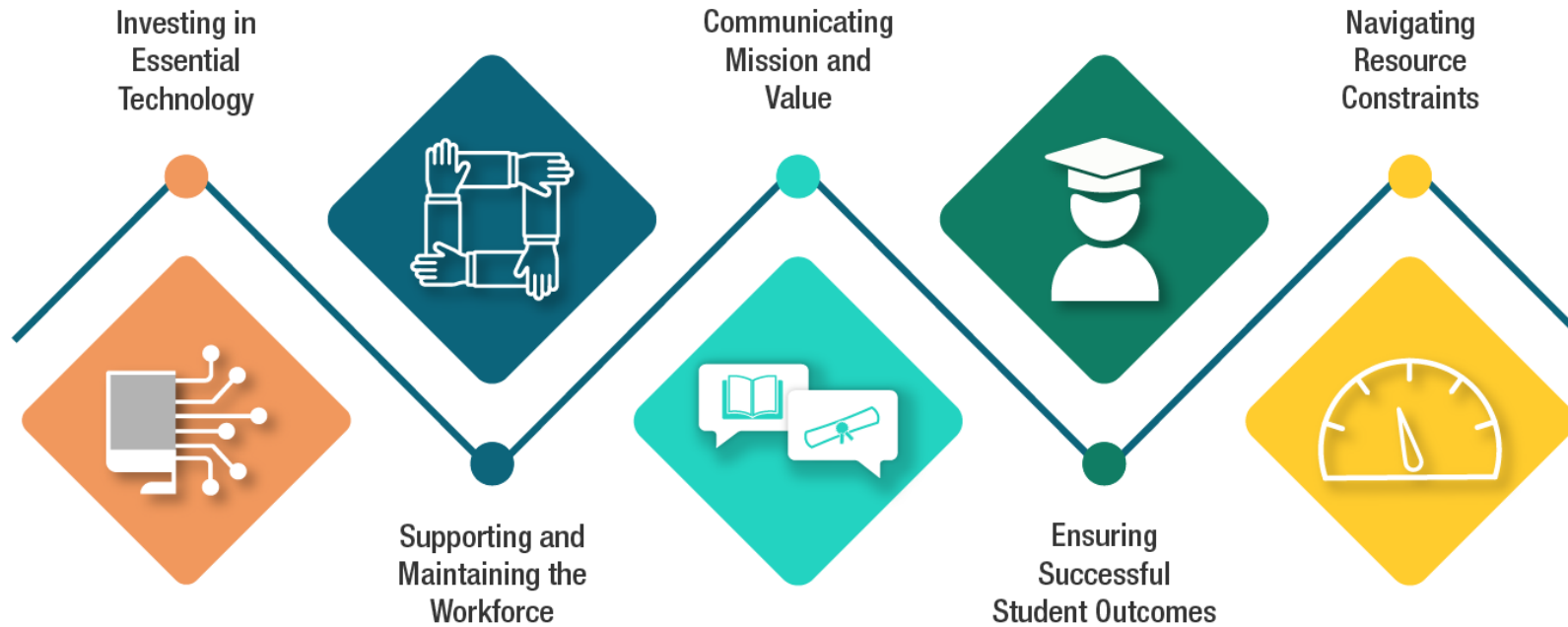


University of Colorado

Boulder | Colorado Springs | Denver | Anschutz Medical Campus

INTERNAL AUDIT

NACUBO Top 5 Business Issues Affecting Higher Education



University of Colorado

Boulder | Colorado Springs | Denver | Anschutz Medical Campus

INTERNAL AUDIT



NACUBO

National Association of College
and University Business Officers

Source: NACUBO.org

2025 EDUCAUSE Top 10: Leveraging Technology and Data in Restoring Trust



University of Colorado

Boulder | Colorado Springs | Denver | Anschutz Medical Campus

INTERNAL AUDIT

Source: 2025 EDUCAUSE Top 10: Restoring Trust

EDUCAUSE

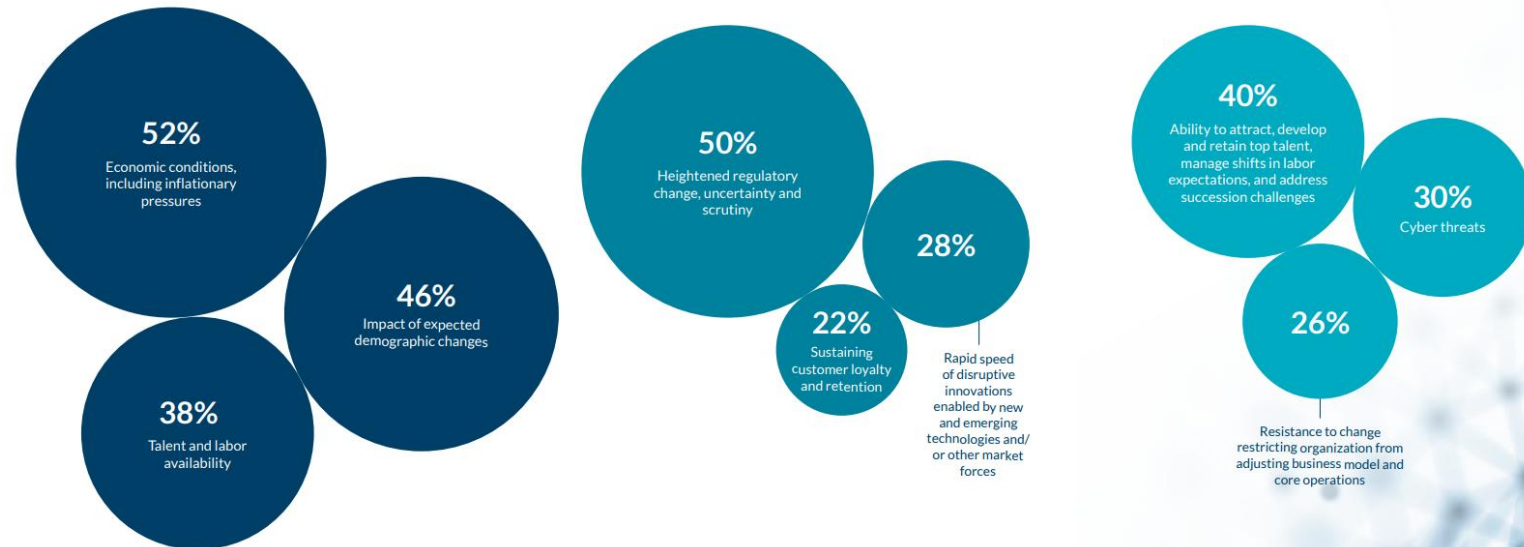
Protiviti

Top Risks for Higher Education

Top 10 near-term risks

1. Cyber threats
2. Ability to attract, develop and retain top talent, manage shifts in labor expectations, and address succession challenges
3. Emergence of new risks from implementing AI
4. Heightened regulatory change, uncertainty, and scrutiny
5. Economic conditions, including inflationary pressures
6. Talent and labor availability
7. Adoption of AI and other emerging technologies requiring new skills in short supply
8. Organization's culture not sufficiently encouraging timely identification and escalation of emerging risk issues
9. Increases in labor costs
10. Impact of expected demographic changes

Top long-term risks



Note: Respondents were asked to identify the "top two" risks in each category (macroeconomic, strategic, operational) separately. That is, respondents identified six risks (two in each category) as "top two" risks. For each category, the three risk issues (including ties) receiving the most responses by percentage are shown.

United Educators

Top Risks Report: Insights for Higher Education

1. **Enrollment:** new student admission and retention of current students
2. **Data Security:** data breaches, phishing, accidental disclosure of personal data, ransomware, and hacking
3. **Operational Pressures:** financial stability, the institution's business model, and constraints on the institution's processes
4. **Recruitment and Hiring:** maintaining a talented staff and faculty workforce
5. **Regulatory and Legal Compliance (Non-VAWA/Title IX):** noncompliance with federal, state, and local regulations and other elective accountability authorities
6. **Facilities and Deferred Maintenance:** outdated facilities and new construction, including inadequate facilities to achieve the institution's mission
7. **Student Mental Health:** mental and emotional well-being, including mental illnesses and suicide
8. **Funding:** risks to core revenue streams
9. **Public Safety:** crime and safety for the institution community and guests, including campus assailants
10. **General Premises Safety:** injury and death caused by slips, trips, falls, and other campus hazards, including public use of facilities | **Title IX:** sex discrimination | **Political and Societal Pressures:** public distrust of education, political attacks, and global instability

KPMG Higher Education Internal Audit Focus Areas in 2025

The opportunity for internal audit (IA) to maximize its influence within the institution and help respond to risk is ever increasing. College and university IA functions can challenge the status quo to reduce risk, improve controls, and identify efficiencies and cost benefits across the institution. We have highlighted several risks and other focus areas to help maximize IA's value to the institution in 2025.

- Appropriateness of **internal controls and staffing** amid federal policy changes and related financial and operating pressures
- Management of **cybersecurity, data governance, and distributed enterprise threats** in campus and patient care environments
- Sufficiency of management's **compliance** with evolving cybersecurity and data governance regulations and grantor requirements, as well as adequacy of security awareness programs
- Appropriateness and extent of the **institution's use and governance of GenAI**
- How **digitization**—including routines, dashboards, and AI to enable risk assessment and real-time auditing— can help mitigate IA's workload and improve efficiency
- **Integrity and consistency of data** used for sustainability, rankings, and other external disclosures
- Adequacy of **key performance indicators** to measure compliance, training, and other imperatives
- Appropriateness of and **compliance with gift acceptance policies and processes** for complying with donor restrictions
- Given their significance to donor compliance and liquidity, effectiveness of policies and procedures in **endowment and treasury management**
- Strength of protocols around **research compliance and integrity**, including as it pertains to grant administration, identification and disclosure of potential conflicts of interest and commitment, and misconduct
- Management, monitoring, and verification of **construction costs** for major capital projects
- As to significant **NCAA programs**, adequacy of name, image, and likeness policies and procedures
- Ways to elevate **internal audit's profile** as a valued adviser to the board, senior administration, and other departments



University of Colorado

Boulder | Colorado Springs | Denver | Anschutz Medical Campus

INTERNAL AUDIT














Source: KPMG "Navigating the Future of Higher Education"



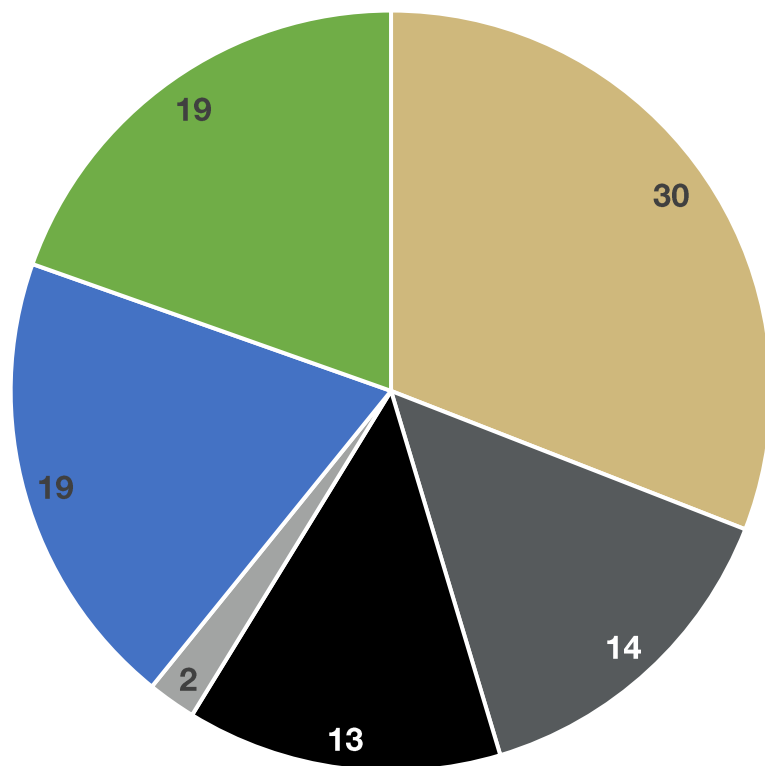
Deloitte Higher Education Insights

1. Tackling significant financial headwinds
2. A new risk paradigm befitting of today's risk landscape
3. The future of the four-year degree
4. Changing workforce needs reflect broader changes transforming the academic enterprise
5. Embracing “systemness”



| Significant risks facing higher education institutions | Significant risk drivers to higher education institutions | |
|---|--|--|
|  Cyber breaches |  Public perception of the value of higher education |  Evolving demand for program offerings |
|  Faculty and staff attrition |  Decline in US population growth |  Lack of institutional agility in decision-making |
|  Student activism |  Overdependence on tuition for revenue |  Deferred maintenance |
|  Mergers, acquisitions, and closures |  Declining student mental health |  Politicization of higher education |
|  Shift in administrative priorities impacting funding sources | | |

Campus & System Administration Interviews



■ CU Boulder
■ CU Anschutz | Denver
■ CU Anschutz
■ CU Denver
■ UCCS
■ System Administration

- **97** individuals interviewed with varied levels of responsibility and oversight for
 - student success | research | compliance | finance | risk management | IT and information security | legal | operations | athletics | staff and faculty affairs
- Discussed priorities, challenges, success indicators and enablers, data needs, and ways Internal Audit can support achievement of objectives and emerging risks
- **Key themes noted:**
 - heightened regulatory change, uncertainty and scrutiny | budget constraints | demographics and enrollment challenges | recruitment and retention of talented faculty and staff

Key Themes in FY26 Audit Plan



University of Colorado

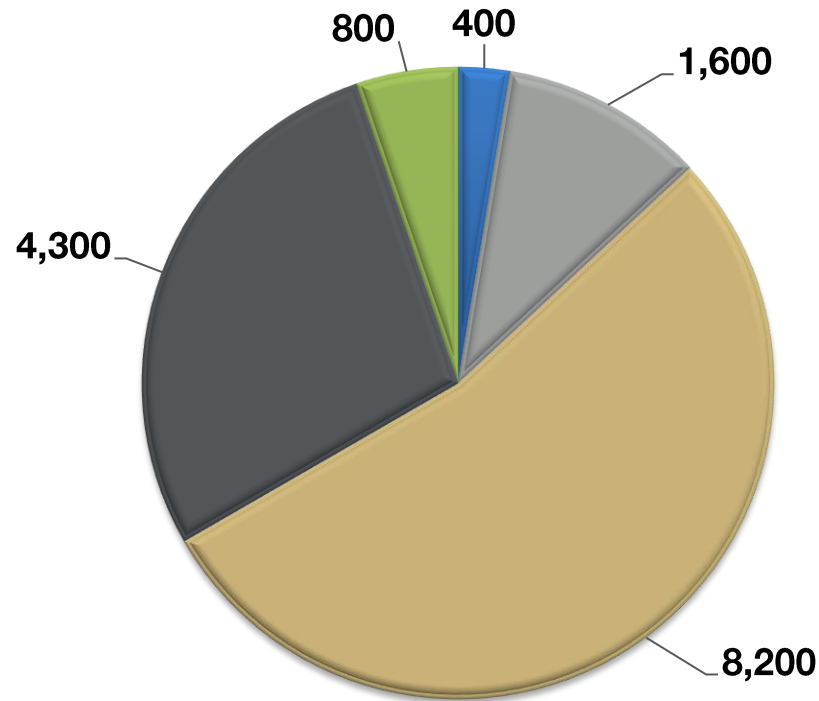
Boulder | Colorado Springs | Denver | Anschutz Medical Campus

INTERNAL AUDIT

Internal Audit Capacity

Available Project Hours

■ CAE ■ Directors ■ Non-IT Audit Staff ■ IT Audit Staff ■ Data Analytics



- Assurance and advisory engagements are managed by **2** audit directors and executed by **6** operational/financial/compliance and **3** IT staff, with support from the senior manager for data analytics.
- A total of **14,830** project hours are available for the assurance and advisory projects in the FY26 annual audit plan.
- FY26 available capacity for assurance and advisory engagements is reduced by **1,250** hours from FY25 due to reallocation of an FTE to support the CU EthicsLine and fiscal misconduct investigations portfolio. This reduction will be, in part, offset by continued focus on operational efficiencies.



University of Colorado

Boulder | Colorado Springs | Denver | Anschutz Medical Campus

INTERNAL AUDIT

FY26 Audit Plan

| CU System Administration | CU Boulder | CU Anschutz | CU Denver | UCCS |
|---|--|--|------------------------|---|
| Data Governance and Management * ‡ | | | | |
| Gramm-Leach Bliley Act (GLBA) Safeguards Rule Compliance ‡ | | | | |
| Payment Card Industry Data Security Standard (PCI DSS) Compliance | | | | |
| Board of Regents Office Expenses | Acquisition of Non-Centrally Provisioned Software and Information Technology (IT) Services | Acquisition of Non-Centrally Provisioned Software and IT Services | | Dining Services Inventory and Cash Management ‡ |
| Executive Expenses | Alamo Bowl Expenses | CU Family Health Clinic Pharmacy Operations | Research Data Security | Operational Efficiency Review |
| PeopleSoft Time & Labor * | Athletic Camps/Minors on Campus ‡ | Endpoint Security * | | Slate Implementation * |
| Procurement Card (P-Card) Utilization | Construction Project Closeout Process | IT Equipment Decommissioning | | |
| Treasury Investment Process: Internal Controls | Emergency Operations Center IT Security | P-Card Utilization: Administrative Functions | | |
| | Engineering Program Partnership Agreements Compliance | School of Dental Medicine Clinical Operations Data Security and Governance | | |
| | InfoEd Data Access and Security Controls * | | | |
| | P-Card Utilization: Institutes | | | |

‡ Rolled forward from FY25 Audit Plan

* Advisory

Additional Projects in Progress

The following projects from the FY25 Audit Plan are in progress as of May 31, 2025, and anticipated to be completed by August 31, 2025:

| CU System Administration | CU Boulder | CU Anschutz | CU Denver | UCCS |
|--|---|---|--------------------|-----------------|
| Donor Recognition Events | Institutional Scholarship Award Process | Marketplace Purchases Policy Compliance for Transactions Under \$10,000 | | Field Trip Fees |
| Information Technology Asset Management (ITAM) | Laboratory Physical Access Controls | HIPAA Security Compliance | P-Card Utilization | |
| Security Information and Event Management (SIEM) Process Effectiveness | P-Card Utilization | Travel and Out-of-Pocket Expenses Charged to Restricted Funds | | |
| University-Wide Pricing Agreement Use and Process Administration | | | | |

Other Planned Internal Audit Initiatives for FY26

- Continue to advance the use of technology, machine learning, and data analytics in audits and fiscal misconduct investigations
- Implement a new workpaper management solution for audits and fiscal misconduct investigations, which will result in operational efficiencies
- Support campuses by sharing data analytics insights for P-Card and travel card usage



University of Colorado

Boulder | Colorado Springs | Denver | Anschutz Medical Campus

INTERNAL AUDIT

Appendix FY26 Project Descriptions



University of Colorado

Boulder | Colorado Springs | Denver | Anschutz Medical Campus

INTERNAL AUDIT













Please Note...

The following descriptions provide a high-level, preliminary sense of planned engagements. They are not meant to definitively represent the nature, extent, and timing of procedures to be performed.

For **audit/assurance engagements**, objectives and scope of each project will be refined during planning procedures and presented to the stakeholders at the entrance meeting.

For **advisory/consulting engagements**, objectives, scope, and deliverables will be agreed upon with the stakeholders and documented in an engagement letter.

FY26 Audit Plan

| Campus | Engagement | Source / Supported Strategic Pillar |
|---------|--|---|
| CU-wide | Data Governance and Management * <i>The Data Governance and Management project's goal is to deploy a common integration layer to enable data sharing between campuses and departments, and to define a CU system-wide data strategy to improve access to data and standardize reporting. Two identified project work streams are data governance and data catalog development. IA will work with project executive sponsors to provide advisory services to help support successful outcomes.</i> | Management Request     |
| CU-wide | GLBA Safeguards Rule Compliance <i>The GLBA requires financial institutions to implement privacy and information security controls sufficient to protect consumer financial data. The Federal Trade Commission (FTC) has determined that higher education institutions are financial institutions for purposes of the Safeguards Rule (16 CFR Part 314), which requires institutions to implement measures to ensure the security and confidentiality of certain nonpublic personal information that is obtained when the institution offers or delivers a financial product or services for personal, family, or household purposes. This information includes but is not limited to student financial aid and similar records. IA will review processes established for supporting completeness of covered program and data identification and effectiveness of data security control self-assessments implemented by campuses to ensure compliance with applicable regulatory requirements.</i> | Risk Assessment     |
| CU-wide | PCI DSS Compliance <i>PCI DSS is a set of security standards for organizations handling payment card information, rather than a law, and is enforced by the PCI Security Standards Council through banking institutions. PCI DSS helps ensure that sensitive payment information is encrypted and stored securely, and that there are processes in place to detect and respond to security incidents. PCI DSS compliance helps higher education institutions meet the contractual obligations associated with accepting credit card payments for tuition, fees, and other services. Failing to comply can lead to fines, loss of certification, and reputational damage, potentially impacting student enrollment and alumni donations. IA will evaluate consistency of adherence to internal policies, procedures, and controls established to protect cardholder data.</i> | Risk Assessment     |



University of Colorado

Boulder | Colorado Springs | Denver | Anschutz Medical Campus

INTERNAL AUDIT

* Advisory



Pillar 1: Affordability & Student Success



Pillar 2: Discovery & Impact



















Pillar 3: Diversity, Inclusion, Equity & Access















Pillar 4: Fiscal Strength

FY26 Audit Plan

| Campus | Engagement | Source / Supported Strategic Pillar |
|--------------------------|--|---|
| CU System Administration | Board of Regents Office Expenses <i>The Board of Regents Office is responsible for managing its allocated financial resources responsibly. Accurate expense reporting is critical to building and maintaining public trust and promoting transparency. IA will evaluate whether the Board of Regents Office expenses are properly authorized, accurately recorded, and in compliance with applicable university policies, procedures, and budgetary guidelines.</i> | Risk Assessment     |
| CU System Administration | Executive Expenses <i>Annually, IA reviews expenses submitted by the CU President, Chancellors, Vice Presidents, and their support staff. The scope will include transactions submitted in FY25.</i> | Cadence     |
| CU System Administration | PeopleSoft Time & Labor * <i>CU is in the process of replacing MyLeave with PeopleSoft HCM Time and Labor module. The new module will be compatible with the existing payroll system and eliminate potential errors created by miscommunications between the disparate platforms. This advisory project will provide support to the implementation group by participating in and evaluating user acceptance testing against policies and procedures. Insights will be shared real-time to contribute to the project's success.</i> | Risk Assessment     |
| CU System Administration | P-Card Utilization <i>The university's P-Card program establishes a method for university personnel to purchase needed items and services according to established rules and subsequently review, approve, and charge the purchase to the appropriate university account. Inconsistent application of controls could result in the university paying for unallowable items or services. IA will evaluate appropriateness of P-Card charges against applicable university policies, also comparing them to common scenarios of potential misuse, and review for patterns that may signal opportunities for increased efficiency (e.g., leveraging economies of scale) or effectiveness (e.g., internal control compliance) of purchasing practices.</i> | Risk Assessment     |















FY26 Audit Plan

| Campus | Engagement | Source / Supported Strategic Pillar |
|--------------------------|---|---|
| CU System Administration | Treasury Investment Process: Internal Controls Review <i>In 2023, IA supported the Treasury Investment Process Review Committee assessment of the CU Treasury operating reserve investment processes and associated controls, effectiveness of communication and reporting, and sufficiency of relevant training. As an outcome of the assessment, a list of recommendations was developed and shared with CU Treasury. In this engagement, IA will review the implementation of associated recommendations and the effectiveness of related internal controls.</i> | Follow Up     |
| CU Boulder | Acquisition of Non-Centrally Provisioned Software and IT Services <i>The campus Office of Information Technology (OIT) aims to build and provide a more robust cloud storage (e.g., Cloud Foundations Service) and software applications to the CU Boulder community to enable convenient, easily accessible, and secure solutions for effective work and storage of sensitive university data across all classification levels. Because using tools and solutions made available by OIT is not mandated, campus units often engage in independent acquisition of software and IT services. IA will identify and review applicable policies for non-centrally provisioned software and IT services, and assess current campus practices against those policies, specifically focusing on the nature, extent, and timing of risk assessment reviews.</i> | Risk Assessment     |
| CU Boulder | Alamo Bowl Expenses <i>Bowl game expenses are often funded by a combination of multiple sources and have specific allowability rules associated with them. Misuse or excessive spending can attract negative media attention and damage the institution's reputation. IA will evaluate 2024 Alamo Bowl expenses for proper authorization, accurate recording, and compliance with university, National Collegiate Athletic Association (NCAA), and Big 12 conference policies. IA will also assess whether expenditures were reasonable, necessary, and supported the intended purpose of the Alamo Bowl funds.</i> | Risk Assessment     |



FY26 Audit Plan

| Campus | Engagement | Source / Supported Strategic Pillar |
|------------|--|---|
| CU Boulder | Athletics Camps / Minors on Campus <i>Colorado Athletics hosts a wide variety of summer camps for children and youth. These programs require additional resources and increased oversight to ensure the health and safety of their valued participants. IA will evaluate the application of controls designed to protect minors participating in campus-sponsored/hosted athletic programs, test adherence to established university policies and procedures, and assess compliance with NCAA regulations.</i> | Risk Assessment     |
| CU Boulder | Construction: Project Closeout Process <i>The university invests significant time and resources in construction and renovation projects to facilitate education, research, and community goals and initiatives. Many of these projects rely on the expertise of external vendors and contractors who partner with the campus and university personnel to meet campus community expectations of timely completion and high-quality work. IA will review the established construction project closeout process and controls, focusing on a sample of recently completed construction projects at CU Boulder, to assess their design and operating effectiveness in managing risks that could prevent the achievement of related business objectives or consistent compliance with relevant policies, procedures, and contractual terms and conditions.</i> | Risk Assessment     |
| CU Boulder | Emergency Operations Center IT Security <i>CU Boulder's Division of Public Safety (DPS) was formed in early 2024 to integrate the university's robust public safety resources under one umbrella, strengthening existing partnerships, policies, and procedures. The Emergency Operations Center was established as part of the DPS and is activated during large events such as football games, concerts, commencement, and the BOLDERBoulder 10K road race, which finishes on campus. The Emergency Operations Center provides unified support from campus-wide, local, and state-wide public safety resources. IA will evaluate the design and operating effectiveness of security controls at the Emergency Operations Center, specifically focusing on IT equipment access and security practices.</i> | Risk Assessment     |



University of Colorado

Boulder | Colorado Springs | Denver | Anschutz Medical Campus

INTERNAL AUDIT

* Advisory



Pillar 1: Affordability & Student Success

Pillar 2: Discovery & Impact















Pillar 3: Diversity, Inclusion, Equity & Access



Pillar 4: Fiscal Strength

FY26 Audit Plan

| Campus | Engagement | Source / Supported Strategic Pillar |
|------------|---|---|
| CU Boulder | Engineering Program Partnership Agreements Compliance <i>CU Boulder's College of Engineering and Applied Science has established partnerships with Colorado Mesa University (CMU) and Western Colorado University (WCU), to offer engineering programs on their campuses. IA will assess the design and operating effectiveness of controls established to support compliance with contractual terms and conditions, specifically relating to faculty relations and compensation.</i> | Risk Assessment     |
| CU Boulder | InfoEd Data Access and Security Controls * <i>The Cybersecurity Maturity Model Certification (CMMC) is a Department of Defense program designed to ensure that defense contractors implement adequate cybersecurity controls and processes to protect Federal Contract Information (FCI) and Controlled Unclassified Information (CUI) stored on their systems and networks. CMMC requires contractors to demonstrate compliance with specific cybersecurity standards based on the type and sensitivity of the information they handle. CMMC Level 1 requires organizations to implement 15 basic cybersecurity practices outlined in Federal Acquisition Rules clause 52.204-21 to protect FCI. These practices focus on core areas like access control, identification and authentication, media protection, physical security, and system and communications protection. Throughout their research activities, principal investigators are often in possession of CUI. Developed by InfoEd Global for electronic research administration, Boulder eRA serves as the comprehensive and official repository for sponsored project proposals and awards. The InfoEd application is supported by the OIT eRA Team. IA will review InfoEd data access and security controls designed to comply with CMMC Level 1 requirements.</i> | Risk Assessment     |
| CU Boulder | P-Card Utilization: Institutes <i>The university's P-Card program establishes a method for university personnel to purchase needed items and services according to established rules and subsequently review, approve, and charge the purchase to the appropriate university account. Inconsistent application of established controls could result in the university paying for unallowable items or services. IA will evaluate the appropriateness of P-Card charges at CU Boulder Institutes against applicable university policies and campus procedures, also comparing them to common scenarios of potential misuse, and review for patterns that may signal opportunities for increased efficiency (e.g., leveraging economies of scale) or effectiveness (e.g., internal control compliance) of purchasing practices.</i> | Risk Assessment     |



University of Colorado

Boulder | Colorado Springs | Denver | Anschutz Medical Campus

INTERNAL AUDIT

* Advisory



Pillar 1: Affordability & Student Success

Pillar 2: Discovery & Impact















Pillar 3: Diversity, Inclusion, Equity & Access



Pillar 4: Fiscal Strength

FY26 Audit Plan

| Campus | Engagement | Source / Supported Strategic Pillar |
|----------------------|---|--|
| CU Denver Anschutz | Acquisition of Non-Centrally Provisioned Software and IT Services <i>The CU Anschutz OIT provides shared services to the CU Denver and CU Anschutz campuses, aiming to build and provide more robust cloud storage and software applications to enable convenient, easily accessible, and secure solutions for effective work and storage of sensitive university data across all classification levels. Because using tools and solutions made available by OIT is not mandated, campus units often engage in independent acquisition of software and IT services. IA will identify and review applicable policies for non-centrally provisioned software and IT services, and assess current campus practices against those policies, specifically focusing on the nature, extent, and timing of risk assessment reviews.</i> | Risk Assessment     |
| CU Anschutz | CU Family Health Clinic Pharmacy Operations <i>The on-site closed-network pharmacy at CU Family Health Clinic (previously Sheridan Health Services) fills prescriptions from clinic providers and pharmacy students work under Chronic Disease State Management (CDTM) protocols to manage medication therapy for patients with diabetes, hypertension, hypercholesterolemia, and obesity. IA will evaluate whether the pharmacy operations comply with applicable laws, regulations, and university policies, and assess the design and operational effectiveness of controls over prescription processing, inventory management, billing practices, and clinical services for support of safe, accurate, and ethical delivery of pharmaceutical care.</i> | Risk Assessment     |
| CU Anschutz | Endpoint Security * <i>Endpoint security is a strategy to protect and defend desktops, laptops, and mobile devices from malicious activity. Key contributors to proper and successful endpoint security include, but are not limited to, anti-virus software, firewalls, restrictive permissions and policies, patch management, configuration settings, and intrusion detection and prevention systems. The CU Anschutz Office of Information Security (OIS) is in the process of strengthening endpoint security controls through a set of robust policies, enhanced training, and segmentation of virtual private networks. IA will review the design of the proposed process changes to assess their effectiveness in strengthening endpoint security.</i> | Management Request     |



University of Colorado

Boulder | Colorado Springs | Denver | Anschutz Medical Campus

INTERNAL AUDIT

* Advisory



Pillar 1: Affordability & Student Success



Pillar 2: Discovery & Impact















Pillar 3: Diversity, Inclusion, Equity & Access



Pillar 4: Fiscal Strength

FY26 Audit Plan

| Campus | Engagement | Source / Supported Strategic Pillar |
|-------------|--|---|
| CU Anschutz | IT Equipment Decommissioning <i>The speed of technology continues to increase at an unprecedented rate. Product lifecycles grow shorter and the need for innovation is now a necessity. Organizations upgrading their IT equipment must also consider a thorough decommissioning strategy for outdated IT equipment, particularly taking into consideration possibilities of new malicious cyber-attacks and data theft. This audit will review the process for decommissioning and disposal of IT equipment at CU Anschutz, with focus on critical backups of data, asset safeguarding, removal of access, data erasure, and compliance with regulations such as PCI DSS, Health Insurance Portability and Accountability Act (HIPAA), Fair and Accurate Credit Transactions Act (FACTA), Family Education Rights and Privacy Act (FERPA), Federal Information Security Modernization Act (FISMA), and National Institute of Standards and Technology (NIST) Standard 800-53.</i> | Risk Assessment     |
| CU Anschutz | P-Card Utilization: Administrative Functions <i>The university's P-Card program establishes a method for university personnel to purchase needed items and services according to established rules and subsequently review, approve, and charge the purchase to the appropriate university account. Inconsistent application of established controls could result in the university paying for unallowable items or services. IA will evaluate the appropriateness of P-Card charges throughout CU Anschutz Administrative Functions against applicable university policies and campus procedures, also comparing them to common scenarios of potential misuse, and review for patterns that may signal opportunities for increased efficiency (e.g., leveraging economies of scale) or effectiveness (e.g., internal control compliance) of purchasing practices.</i> | Risk Assessment     |
| CU Anschutz | School of Dental Medicine Clinical Operations Data Security and Governance <i>IT governance plays a vital role in ensuring the efficient, secure, and effective use of IT assets and resources through clear, well-defined policies and procedures. CU Anschutz operates under a federated IT management model, with certain responsibilities performed by the central OIT/OIS teams and others resting with individual schools and colleges. IA will assess the School of Dental Medicine's IT governance framework by reviewing applicable current policies, procedures, and practices to determine their effectiveness in safeguarding School of Dental Medicine data.</i> | Risk Assessment     |



University of Colorado

Boulder | Colorado Springs | Denver | Anschutz Medical Campus

INTERNAL AUDIT

* Advisory



Pillar 1: Affordability & Student Success



Pillar 2: Discovery & Impact



















Pillar 3: Diversity, Inclusion, Equity & Access



Pillar 4: Fiscal Strength

FY26 Audit Plan

| Campus | Engagement | Source / Supported Strategic Pillar |
|-----------|---|--|
| CU Denver | Research Data Security <i>Research recipients are responsible for the security and protection of data gathered, generated, and analyzed during the execution of proposed work as specified in awarded federal grants and contracts. IA will identify and evaluate the design and operating effectiveness of established data security controls.</i> | Risk Assessment     |
| UCCS | Dining Services Inventory and Cash Management (Rolled forward from FY25) <i>In response to IA reports issued in 2018, Dining and Hospitality Services implemented several operational and procedural changes to address identified risks and vulnerabilities. The planned changes were fully implemented by the end of 2019/beginning of 2020, approximately two months before the campus shutdown due to the COVID-19 pandemic. IA will assess the status of inventory and cash management systems and practices within Dining Services.</i> | Follow Up     |
| UCCS | Operational Efficiency Review <i>At UCCS, faculty hiring process is housed within and driven by the school or college where the selected candidate will be rostered. Given the distributed nature of these search processes across the campus, there is an increased potential for variation in search processes and interpretations of campus human resource guidance. IA will review selected hiring processes and practices across the UCCS campus for compliance with applicable guidance.</i> | Risk Assessment     |
| UCCS | Slate Implementation * <i>UCCS is in the process of implementing Slate, an application that supports the recruiting and admissions process. Slate will be critical for UCCS success in attracting and admitting students and will replace the currently used Salesforce solution. This advisory project will provide support to the implementation group by participating in user acceptance testing and data validation process to the extent applicable. Insights will be shared real-time to contribute to the project's success.</i> | Management Request     |

