**Purpose of the Annual Report:** To provide information on the benefits and effectiveness of the internal audit function. In addition, the annual report assists central oversight agencies in their planning and coordination efforts.

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**Purpose of the Annual Internal Audit Report:** To provide information on the assurance services, consulting services, and other activities of the internal audit function. In addition, the annual internal audit report assists oversight agencies in their planning and coordination efforts.

# I. Compliance with Texas Government Code, Section 2102.015: Posting the Internal Audit Plan, Internal Audit Report, and Other Audit Information on Internet Web site

The Internal Audit plan and Internal Annual Report is contained within the Reports to the State section of UTHealth's web site as required by Texas Government Code, Section 2102.015. An updated report is provided to the web developer in the Office of Institutional Advancement via email. The web developer then posts the information no later than one day prior to the due date for submission to the appropriate reporting state agencies.

#### II. Internal Audit Plan for Fiscal Year 2019

Audit	FY 2019 Audit Plan			Report
Number	Audit/Project	Description	Status	Date
	Financial Audits	Description	Complete	
		Control and transaction testing,		
		analytical review, and other		
		procedures assigned as part of the		Report issued
	Financial Statements FY 2018	financial statements assurance		by D&T at UT
19-101	Assurance Work	audit.	Complete	System level
				Report issued
	Financial Statements FY 2019	Interim work for FY2019 financial	_	by D&T at UT
19-102	Assurance Work	statement audit.	Complete	System level
	Assist State Auditor's Office	Provide assistance to the State		
	and other state and/or federal	Auditor's Office and other external		No Report
19-103	auditors	audit functions.	Complete	Issued
		Review for compliance with UTS		
		142.1, Section 6 requiring audits of		
		the monitoring plan to validate the		
10.440	De la castivalitada	assertions on segregation of duties	0	40/00/0040
19-118	Review and Validation	and account reconciliations.	Complete	10/29/2018
	Operational Audits			
		D : ( (() : 1 ( ) ()		,
40.400	Executive Travel and	Review of official function, and	0	No Report
19-108	Entertainment	travel and entertainment expenses.	Complete	Issued
40.400	C Comp Dedain - Contain	Review of controls over the C-Cure	In December	
19-109	C-Cure Badging System	Badging System.	Progress	
10 110	Call Cantar	Review of controls around the call	In	
19-112	Call Center	center processes.	Progress	
19-113	Contract Audit (TBD)		Cancelled	

		Review of controls around student		
		status updates and compliance	ln .	
19-116	Student Status	with federal guidelines.	Progress	
19-110	Student Status	Review of controls over the	Flogress	
		Pediatrics Clinic at Houston		
		Medical Center's billing and		
		collections, payments and deposits,		
		· · ·		
		accounts receivable, system	_	
19-307B	Pediatric Dentistry at HMC	access and encryption.	Complete	02/13/2019
	Carryforward Audits			
		Review of controls over the		
		Pediatric Clinic at Greenspoint,		
		receipt of payments and deposits,		
	DSRDP School of Dentistry	billings and collections, accounts		
18-111	Pediatrics Clinic at	receivable, system access and	Complete	10/30/2018
10-111	Greenspoint	encryption.  Review to determine compliance	Complete	10/30/2016
		with Medicare Access and CHIP		
18-113	MACRA	Reauthorization Act.	Complete	07/31/2019
10 110	IVII COLLI	Review of controls over purchasing	Complete	0170172010
		processes including coding and		
18-114	Purchasing	use of blanket purchase orders.	Complete	05/08/2019
		Review of controls surrounding the	In .	
19-300F	Admissions Process	admissions process.	Progress	
	Compliance Audits			
	Texas Higher Education	Provide opinion on revenue and		
	Texas Higher Education Coordinating Board Residency	expenditure reporting on annual		
19-107	Texas Higher Education	expenditure reporting on annual financial report.	Complete	12/07/2019
19-107	Texas Higher Education Coordinating Board Residency Program (THECB)	expenditure reporting on annual financial report.  Assess compliance with MSRDP	Complete	12/07/2019
	Texas Higher Education Coordinating Board Residency Program (THECB)  Medical School Practice Plan	expenditure reporting on annual financial report.  Assess compliance with MSRDP process or bylaws. Will be		12/07/2019
19-107 19-110	Texas Higher Education Coordinating Board Residency Program (THECB)  Medical School Practice Plan (MSRDP)	expenditure reporting on annual financial report.  Assess compliance with MSRDP process or bylaws. Will be performed based on risk.	Complete	12/07/2019
19-110	Texas Higher Education Coordinating Board Residency Program (THECB)  Medical School Practice Plan (MSRDP) Dental School Practice Plan	expenditure reporting on annual financial report.  Assess compliance with MSRDP process or bylaws. Will be performed based on risk.  Review efficiency and effectiveness	Cancelled	12/07/2019
	Texas Higher Education Coordinating Board Residency Program (THECB)  Medical School Practice Plan (MSRDP)	expenditure reporting on annual financial report.  Assess compliance with MSRDP process or bylaws. Will be performed based on risk.  Review efficiency and effectiveness of operations.		12/07/2019
19-110	Texas Higher Education Coordinating Board Residency Program (THECB)  Medical School Practice Plan (MSRDP) Dental School Practice Plan	expenditure reporting on annual financial report.  Assess compliance with MSRDP process or bylaws. Will be performed based on risk.  Review efficiency and effectiveness of operations.  Review of controls around IRB	Cancelled	12/07/2019
19-110 19-111	Texas Higher Education Coordinating Board Residency Program (THECB)  Medical School Practice Plan (MSRDP) Dental School Practice Plan (DSRDP)	expenditure reporting on annual financial report.  Assess compliance with MSRDP process or bylaws. Will be performed based on risk.  Review efficiency and effectiveness of operations.  Review of controls around IRB processes and compliance with	Cancelled	
19-110	Texas Higher Education Coordinating Board Residency Program (THECB)  Medical School Practice Plan (MSRDP) Dental School Practice Plan	expenditure reporting on annual financial report.  Assess compliance with MSRDP process or bylaws. Will be performed based on risk.  Review efficiency and effectiveness of operations.  Review of controls around IRB processes and compliance with federal guidelines.	Cancelled	12/07/2019 08/21/2019
19-110 19-111	Texas Higher Education Coordinating Board Residency Program (THECB)  Medical School Practice Plan (MSRDP) Dental School Practice Plan (DSRDP)  IRB Process	expenditure reporting on annual financial report.  Assess compliance with MSRDP process or bylaws. Will be performed based on risk.  Review efficiency and effectiveness of operations.  Review of controls around IRB processes and compliance with federal guidelines.  Review of payroll processes for the	Cancelled	
19-110 19-111 19-114	Texas Higher Education Coordinating Board Residency Program (THECB)  Medical School Practice Plan (MSRDP) Dental School Practice Plan (DSRDP)  IRB Process  Teacher Retirement System of	expenditure reporting on annual financial report.  Assess compliance with MSRDP process or bylaws. Will be performed based on risk.  Review efficiency and effectiveness of operations.  Review of controls around IRB processes and compliance with federal guidelines.  Review of payroll processes for the Teacher Retirement System of	Cancelled Cancelled Complete	08/21/2019
19-110 19-111	Texas Higher Education Coordinating Board Residency Program (THECB)  Medical School Practice Plan (MSRDP) Dental School Practice Plan (DSRDP)  IRB Process	expenditure reporting on annual financial report.  Assess compliance with MSRDP process or bylaws. Will be performed based on risk.  Review efficiency and effectiveness of operations.  Review of controls around IRB processes and compliance with federal guidelines.  Review of payroll processes for the	Cancelled	
19-110 19-111 19-114	Texas Higher Education Coordinating Board Residency Program (THECB)  Medical School Practice Plan (MSRDP) Dental School Practice Plan (DSRDP)  IRB Process  Teacher Retirement System of	expenditure reporting on annual financial report.  Assess compliance with MSRDP process or bylaws. Will be performed based on risk.  Review efficiency and effectiveness of operations.  Review of controls around IRB processes and compliance with federal guidelines.  Review of payroll processes for the Teacher Retirement System of Texas program.	Cancelled Cancelled Complete	08/21/2019
19-110 19-111 19-114 19-115	Texas Higher Education Coordinating Board Residency Program (THECB)  Medical School Practice Plan (MSRDP) Dental School Practice Plan (DSRDP)  IRB Process  Teacher Retirement System of Texas	expenditure reporting on annual financial report.  Assess compliance with MSRDP process or bylaws. Will be performed based on risk.  Review efficiency and effectiveness of operations.  Review of controls around IRB processes and compliance with federal guidelines.  Review of payroll processes for the Teacher Retirement System of Texas program.  To confirm procedures protecting confidentiality of data are in place and that previously received TEA	Cancelled Cancelled Complete	08/21/2019
19-110 19-111 19-114	Texas Higher Education Coordinating Board Residency Program (THECB)  Medical School Practice Plan (MSRDP) Dental School Practice Plan (DSRDP)  IRB Process  Teacher Retirement System of	expenditure reporting on annual financial report.  Assess compliance with MSRDP process or bylaws. Will be performed based on risk.  Review efficiency and effectiveness of operations.  Review of controls around IRB processes and compliance with federal guidelines.  Review of payroll processes for the Teacher Retirement System of Texas program.  To confirm procedures protecting confidentiality of data are in place and that previously received TEA data has been destroyed.	Cancelled Cancelled Complete Complete	08/21/2019
19-110 19-111 19-114 19-115	Texas Higher Education Coordinating Board Residency Program (THECB)  Medical School Practice Plan (MSRDP) Dental School Practice Plan (DSRDP)  IRB Process  Teacher Retirement System of Texas  TEA Compliance	expenditure reporting on annual financial report.  Assess compliance with MSRDP process or bylaws. Will be performed based on risk.  Review efficiency and effectiveness of operations.  Review of controls around IRB processes and compliance with federal guidelines.  Review of payroll processes for the Teacher Retirement System of Texas program.  To confirm procedures protecting confidentiality of data are in place and that previously received TEA data has been destroyed.  Review to determine whether the	Cancelled Cancelled Complete Complete	08/21/2019
19-110 19-111 19-114 19-115	Texas Higher Education Coordinating Board Residency Program (THECB)  Medical School Practice Plan (MSRDP) Dental School Practice Plan (DSRDP)  IRB Process  Teacher Retirement System of Texas  TEA Compliance  THECB Nursing Shortage	expenditure reporting on annual financial report.  Assess compliance with MSRDP process or bylaws. Will be performed based on risk.  Review efficiency and effectiveness of operations.  Review of controls around IRB processes and compliance with federal guidelines.  Review of payroll processes for the Teacher Retirement System of Texas program.  To confirm procedures protecting confidentiality of data are in place and that previously received TEA data has been destroyed.  Review to determine whether the expenditures from award meet	Cancelled Cancelled Complete Complete In Progress	08/21/2019
19-110 19-111 19-114 19-115	Texas Higher Education Coordinating Board Residency Program (THECB)  Medical School Practice Plan (MSRDP) Dental School Practice Plan (DSRDP)  IRB Process  Teacher Retirement System of Texas  TEA Compliance	expenditure reporting on annual financial report.  Assess compliance with MSRDP process or bylaws. Will be performed based on risk.  Review efficiency and effectiveness of operations.  Review of controls around IRB processes and compliance with federal guidelines.  Review of payroll processes for the Teacher Retirement System of Texas program.  To confirm procedures protecting confidentiality of data are in place and that previously received TEA data has been destroyed.  Review to determine whether the expenditures from award meet program expenditure requirements.	Cancelled Cancelled Complete Complete	08/21/2019
19-110 19-111 19-114 19-115	Texas Higher Education Coordinating Board Residency Program (THECB)  Medical School Practice Plan (MSRDP) Dental School Practice Plan (DSRDP)  IRB Process  Teacher Retirement System of Texas  TEA Compliance  THECB Nursing Shortage "Over 70" 2014	expenditure reporting on annual financial report.  Assess compliance with MSRDP process or bylaws. Will be performed based on risk.  Review efficiency and effectiveness of operations.  Review of controls around IRB processes and compliance with federal guidelines.  Review of payroll processes for the Teacher Retirement System of Texas program.  To confirm procedures protecting confidentiality of data are in place and that previously received TEA data has been destroyed.  Review to determine whether the expenditures from award meet program expenditure requirements.  Review to determine whether the	Cancelled Cancelled Complete Complete In Progress	08/21/2019
19-110 19-111 19-114 19-115 19-117	Texas Higher Education Coordinating Board Residency Program (THECB)  Medical School Practice Plan (MSRDP) Dental School Practice Plan (DSRDP)  IRB Process  Teacher Retirement System of Texas  TEA Compliance  THECB Nursing Shortage "Over 70" 2014  THECB Nursing Shortage	expenditure reporting on annual financial report.  Assess compliance with MSRDP process or bylaws. Will be performed based on risk.  Review efficiency and effectiveness of operations.  Review of controls around IRB processes and compliance with federal guidelines.  Review of payroll processes for the Teacher Retirement System of Texas program.  To confirm procedures protecting confidentiality of data are in place and that previously received TEA data has been destroyed.  Review to determine whether the expenditures from award meet program expenditure requirements.  Review to determine whether the expenditures from award meet	Cancelled Cancelled Complete Complete In Progress Complete	08/21/2019 02/14/2019 12/06/2018
19-110 19-111 19-114 19-115	Texas Higher Education Coordinating Board Residency Program (THECB)  Medical School Practice Plan (MSRDP) Dental School Practice Plan (DSRDP)  IRB Process  Teacher Retirement System of Texas  TEA Compliance  THECB Nursing Shortage "Over 70" 2014	expenditure reporting on annual financial report.  Assess compliance with MSRDP process or bylaws. Will be performed based on risk.  Review efficiency and effectiveness of operations.  Review of controls around IRB processes and compliance with federal guidelines.  Review of payroll processes for the Teacher Retirement System of Texas program.  To confirm procedures protecting confidentiality of data are in place and that previously received TEA data has been destroyed.  Review to determine whether the expenditures from award meet program expenditure requirements.  Review to determine whether the	Cancelled Cancelled Complete Complete In Progress	08/21/2019

	Information Technology Audits			
19-201	Crowdstrike	Review of controls around the CrowdStrike Platform.	Complete	04/23/2019
19-202	TAC 202	Determine compliance with selected requirements of Texas Administrative Code (TAC) 202 Information Security Standards.	Complete	12/20/2018
19-203	Guest Administration System	Review of controls around the guest administration processes.	Complete	08/14/2019
19-204	Office 365	Review of controls around the Office 365 application. Review of the internal controls	Complete In	08/07/2019
19-205 19-206	REDCap  SBMI DSRIP Registry	around REDCap.  Review of the technical controls around the Chronic Disease Registry.	Progress In Progress	
19-207	Two-Factor Authentication	Review of controls around two-factor authentication.	Complete	05/23/2019
18-203	<u>Carryforward IT Audits</u> Telemedicine	Review of controls around Telemedicine.	Complete	10/19/2019
18-205	Google Apps for Education	Review of controls around UTH- Share (Google Apps for Education).	Complete	10/19/2019
18-208	SunNet (CLI Contract)	Determine whether payments and work performed are in compliance with the SunNet contract terms.	Complete	10/05/2018
18-210	Citrix	Review of controls around the Citrix application.	Complete	08/1/2019
	Follow-up Audits			
19-104	Recommendation Follow up	Follow up on open recommendations.	Complete	9/03/2019

Audit 19-110 Medical Service Research and Development Plan (300 budgeted hours) and 19-111 Dental Service Research and Development Plan (300 budgeted hours) are audits of compliance with bylaws and processes of each respective plan. In reviewing the FY 2019 Audit Plan, audit #18-113 Medicare Access and Chip Reauthorization Act (400 hours) is a compliance audit, which falls under the MSRDP. In addition, 19-307B Pediatric Dentistry – HMC satisfies the related risks and requirement for the dental plan. Therefore, the MSRDP and DSRDP audits were cancelled without replacement.

The focus of the 19-113 Contract Audit was to be the Insperity contract; however, UT Physicians is moving away from using Insperity to employ certain UTP employees, mitigating this risk. This audit was cancelled without replacement.

### Compliance with the Benefits Proportionality Audit Requirements for Higher Education Institutions

Rider 8, page III-45, the General Appropriations Act (85<sup>th</sup> Legislature, Conference Committee Report), requires Each institution of higher education, excluding Public Community/Junior Colleges, shall conduct an internal audit of benefits proportional by fund and submit a copy of the internal audit to the Legislative Budget Board, Comptroller of Public Accounts, and State Auditor's Office no later than August 31, 2018. The audit must examine fiscal years 2015, 2016, and 2017 and must be conducted using a methodology approved by the State Auditor's Office.

For fiscal years 2018 and 2019, institutions of higher education shall also consider audits of benefits proportional when developing their annual internal audit plans. To comply with this requirement, audit #18-116 examined Appropriation Years 2015, 2016 and 2017. And a Benefits Proportionality audit (#20-116) is included in UTHealth's 2020 annual audit plan and the audit results will be submitted upon completion.

#### Compliance with the Texas Education Code §51.9337

Senate Bill 20 (84th Legislative Session) made several modifications and additions to Texas Government Code (TGC) and Texas Education Code (TEC) related to purchasing and contracting. Effective September 1, 2015, TEC §51.9337 requires that, "The chief auditor of an institution of higher education shall annually assess whether the institution has adopted the rules and policies required by this section and shall submit a report of findings to the state auditor." UTHealth's Auditing and Advisory Services conducted this required assessment for fiscal year 2019, and found the following:

Based on review of current institutional policy and the UT System Board of Regents' *Rules and Regulations*, UTHealth has generally adopted all of the rules and policies required by TEC §51.9337. Review and revision of institutional and System policy is an ongoing process. These rules and policies will continue to be assessed annually to ensure continued compliance with TEC §51.9337.

#### **III. Consulting Services and Non-audit Services Completed**

Report No.	Report Date	Name of Project	High-Level Consulting Engagement/Non-audit Service Objective(s)	Observations/ Results and Recommendations
		Website		Results communicated to the
19-501	N/A	Investigation	Review of website activities.	department.
19-502	N/A	SoD Pharmacy Controls	Review of internal controls surrounding SoD pharmacy	Results communicated to the department.
19-300A	N/A	Inventory Control Assessment	Review internal controls surrounding inventory	In Progress
19-300D	N/A	SOD Chair Utilization		Cancelled
			Review of official function, and travel and entertainment	
19-300E	N/A	Presidential T&E	expenses	Report Issued by UT System Audit
19-303H	5/08/2019	Sole Source & Blanket POs	Review of controls over purchasing processes including coding and use of blanket purchase orders.	Report issued as part of audit #18- 108 Purchasing
19-301	N/A	Office of CFO	Provide data analytics and other support to the Office of the CFO.	No report issued
19-303A	2/13/2019	UTP Pediatric Services AP Consulting	Review of controls over the Pediatrics Clinic at Houston Medical Center's billing and collections, payments and deposits, accounts receivable, system access and encryption.	Report issued as part of Audit #19- 307F
19-303B	N/A	Procurement Analytics Consulting	Assistance Provided to Procurement Services	No Report Issued
19-303D	N/A	Vendor Master File Analysis	Determine whether there are irregularities or anomalies in the vendor master file.	Results communicated to the department.
19-303E	N/A	Lockbox Portal Verification		Cancelled
19-303F	N/A	Taleo Review	Review of access controls, security controls, data protection and Taleo agreements.	Results communicated to the department.
19-303G	N/A	Supplemental Pay Verification		Cancelled
19-304A	N/A	Medical Devices Consulting	Review controls around medical devices.	Results communicated to the department.
19-304B	N/A	Network Access Listing	Review controls around network access.	Results communicated to the department.
19-304C	N/A	Tiger Text Adoption	Determine adoption rate of the Tiger Text application for communicating PHI information.	Results communicated to the department.

19-304D	N/A	Splunk Alerting Consulting	Determine utilization of the Splunk application for high risk applications.	Results communicated to the department.
19-306A	N/A	GECB User Account Review		Cancelled
19-306B	N/A	Revenue Cycle Analytics		Cancelled
19-307A	N/A	SoD SD Card Consulting	Determine whether SD cards at the School of Dentistry are securely stored and do not contain PHI.	Results communicated to the department.
19-307D	N/A	SoD High Dollar Inventory	Assistance to the School of Dentistry	No Report Issued
19-308	N/A	Sponsored Project Consulting		Cancelled

#### IV. External Quality Assurance Review (Peer Review)



June 28, 2017

Mr. Daniel Sherman, Chief Audit Executive The University of Texas Health Sciences Center at Houston

In May 2017, The University of Texas Health Sciences Center at Houston (UT Health) Auditing & Advisory Services (A&AS or IA) completed a self-assessment of internal audit activities in accordance with guidelines published by the Institute of Internal Auditors (IIA) for the performance of a quality assessment review (QAR). UT Health A&AS engaged an independent review team consisting of three internal audit professionals with extensive higher education and healthcare experience to perform an independent validation of A&AS' QAR self-assessment. The primary objective of the validation was to verify the assertions made in the QAR report concerning IA's conformity to the Institute of Internal Auditor's International Standards for the Professional Practice of Internal Auditing (the IIA Standards) and Code of Ethics, Generally Accepted Government Auditing Standards (GAGAS), and the relevant requirements of the Texas Internal Auditing Act (TIAA).

The IIA's *Quality Assessment Manual* suggests a scale of three ratings, "generally conforms," "partially conforms," and "does not conform." "Generally conforms" is the top rating and means that an internal audit activity has a charter, policies, and processes that are judged to be in conformance with the *Standards*. "Partially conforms" means deficiencies in practice are noted that are judged to deviate from the *Standards*, but these deficiencies did not preclude the IA activity from performing its responsibilities in an acceptable manner. "Does not conform" means deficiencies are judged to be so significant as to seriously impair or preclude the IA activity from performing adequately in all or in significant areas of its responsibilities.

Based on our independent validation of the QAR performed by A&AS, we agree with A&AS' overall conclusion that the internal audit function "Generally Conforms" with the Institute of Internal Auditors' International Standards for the Professional Practice of Internal Auditing and Code of Ethics, as well as with A&AS' conclusions regarding GAGAS and TIAA requirements. Our review noted strengths as well as opportunities for enhancing the internal audit function.

This information has been prepared pursuant to a client relationship exclusively with, and solely for the use and benefit of, The University of Texas System Administration and UT Health and is subject to the terms and conditions of our related contract. Baker Tilly disclaims any contractual or other responsibility to others based on its use and, accordingly, this information may not be relied upon by anyone other than The University of Texas System Administration and UT Health.

The review team appreciates the cooperation, time, and candid feedback of executive leadership, stakeholders, and A&AS personnel.

Very truly yours,

Baker Tilly Virchow Krause, LLP



#### V. Internal Audit Plan for Fiscal Year 2020

FY 2020 Audit Plan	Budgeted	
Audit/Project	Hours	Description
Assurance Engagements		
Cloud Vendor Risk Assessments	500	Review IT Security initial and ongoing risk assessments of cloud vendors.
Biomedical Device Maintenance	450	Environmental/health/safety review of biomedical device maintenance.
Device Profiling (Network Access Controls)	450	Review of controls around device profiling project being conducted by Communications Technology.
Legacy E.H.R.s	500	Review security around active legacy E.H.R.s at UTP clinics.
TAC 202	300	Annual review of Texas Administrative Code 202 - Information Security Standards.
School of Public Health (SPH) Data Center	500	Review general controls over the SPH data center.
Disaster Recovery/Business Continuity	500	Review disaster recovery planning and testing.
MSRDP	300	Review compliance with MSRDP process or bylaws. Will be performed based on assessed risk.
DSRDP	300	Review to assess efficiency and effectiveness of operations at the OralMax clinic.
Grant and Contract Financial Controls	500	Review of processes in the individual schools.
Inventory Controls	500	Review controls around high cost drugs and research supplies.
Conflict of Interest	400	Review of COI and management plan process.
SecureStore	300	Review controls around the application to ensure secure sharing of PHI and other sensitive information.
Clinical Trials Billing	400	Review of Clinical Billing trial practices. Performed as followed to audit 15-121 Clinical Trials Billing.
Visiting Scientists	300	Review to assess processes for onboarding visiting scientists and protection of IP.
Review and Validation	100	Review for compliance with UTS 142.1 requiring audits of the monitoring plan. Work will include assessment of compliance based on updated process including us of RPA.
Carryforward	500	Carryforward of 2019 Audits
Assurance Engagements Subtotal	6,800	

Required Engagements (Externally and Internally)		
Financial Statements FY 2019	100	Controls over transaction testing, analytical review, and other procedures assigned as part of the financial assurance audit.
Financial Statements FY 2020	80	Interim work for FY 2020 financial statements.
Assist State Auditor's Office and other external auditors	150	Provide assistance to the State Auditor's Office and other external audit functions.
THECB	50	Provide an opinion on revenue and expenditures reporting on program funds.
TEA Compliance (CLI)	100	Report on controls over the security of TEA data.
Benefits Proportionality	150	Review of appropriations years 2018 and 2019.
Required Audits Subtotal	630	
Advisory and Consulting Engagements		
Institutional Committees	250	Participation by A&AS in various internal committees.
Training/Assistance Provided by A&AS	100	Train/educate clients on risk and internal audit concepts, including IDEA.
Consulting Projects Reserve	300	Performance of consulting projects requested by management.
Medical Devices Consulting (quarterly)	200	Review of medical devices for compliance with Security Policy Workflow Agreements.
Network Access Listing Consulting (quarterly)	25	Comparison of network access listing with active directory.
SOD Big Mouth Repository Consulting	200	Review of security controls around the SOD Big Mouth Repository.
Practice Websites Consulting	100	Review of legacy practice websites for PHI submission capabilities.
System Access Reviews Consulting (semi-annual)	100	Review of system owner access reviews for applications containing PHI.
Audit Log Monitoring Consulting (semi-annual)	100	Review of audit log monitoring by system owners for applications/databases with PHI.
FACN Contracts Consulting	100	Review of sub-contractual agreements related to the FACN website (built by UTHealth for the Department of Family Protective Services).
Medical School Consulting	200	Financial account monitoring and efficiency and effectiveness of operations.
School of Dentistry Consulting	100	Controls over cash funds and petty cash.
Data Integrity Review	200	Review of custom patient care revenue reports.

Advisory and Consulting Engagements Subtotal	1975	
Risk-Based Reserve		
Management Requests/Emerging Risks	600	Allow for flexibility to add audits as additional risks are identified or to address rapidly changing areas.
Risk-Based Reserve Subtotal	600	
Investigations		
Investigations	400	Hours allocated to perform work related to potential thefts or assist other risk mitigating functions.
Investigations Subtotal	400	
Follow-up		
Follow-up on Open Recommendations	600	Hours designated to perform periodic follow-up to validate the status of outstanding recommendations.
Follow-up Subtotal	600	
Development - Operations		
Quality Assessment Review	157	Departmental process evaluation in preparation for next year's external quality assessment. Yellow Book standards require a QAR every three years.
FY 2021 Audit Plan	250	Development of annual audit plan using risk assessment techniques as required by GC 2102.
Internal Audit Annual Report	50	Preparation and posting of the Internal Audit Plan, Internal Audit Report, and other information as required by HB 16.
Internal Audit Committee	500	Preparation of documents and reports presented at the quarterly meetings and related post meeting documentation.
Internal Process Improvement	300	Periodic review and updating of audit processes by management and staff.
Internal Staff Meetings	500	Bi-monthly departmental staff meetings.
Data Analytics Development	200	Review of UTHealth generated reports and A&AS reports as part of the ongoing risk assessment process.
TeamMate/IDEA Development & Maintenance	200	Maintenance and development of TeamMate database and IDEA.
UT System/External Requests	150	Time devoted to various external reporting requirements, information requests and other types of assistance provided to external agencies.
Development - Operations Subtotal	2,307	
Development – Initiatives and Education		
Professional Activities	150	Writing, publication, external presentations, and participation in professional organizations.

UT System Initiatives	200	Participation in UT System initiatives
		including committees, workgroups, etc.
Continuing Professional Education	550	Professional trainings and CPE courses
		to keep certifications active.
Development – Initiatives and Education Subtotal	900	
Total Budgeted Hours	14,212	

### High Risks Not Included in FY 2020 Audit Plan

FY 2020 Audit Plan	Explanation/Mitigation	Internal Audit Action
Casual employees and employees with dual appointments may work hours beyond the maximum allowed.	Covered under 19-115	
•	TRS	Report Submitted
Billing processes (back end) may not		
be defined through policy.	Covered by Revenue	Risk will be re-evaluated and will continue to
	Cycle Management	monitor developments.
Certain medical reimbursement plans require all work performed related to charges billed, be performed by individuals located in the US, which may require significant additional costs.	Covered by Revenue Cycle Management	Risk will be re-evaluated and will continue to monitor developments.
Patient dissatisfaction may occur when a patient calls in with a question about their bill and does not receive good help.	Covered in 19-112 Call Center	Call Center Audit currently in progress.
Patients may not receive a return call regarding their billing questions.	Covered in 19-112 Call Center	Call Center Audit currently in progress.
Risk that UTHealth will not be prepared if drug resistant (candida aures) strains are introduced into our partner hospitals and UTP clinics	Covered in 17-113 Infection Prevention Control	Report Submitted
Risk that support staff in clinics have not received all of their immunization shots and no clear guidelines on what is required	Monitor developments	Risk will be re-evaluated and will continue to monitor developments.
Memorial Hermann affiliation agreement may be delayed, creating operational and budgeting uncertainties.	Monitor developments	Risk will be re-evaluated and will continue to monitor developments.
Title IV issues may still assure	Title IX Committee,	Manitan Davidan manta
Title IX issues may still occur.  Special arrangements with physician	Compliance A List Risk 4	Monitor Developments
groups may present administrative or personnel issues.	Monitor developments	Risk will be re-evaluated and will continue to monitor developments.

UTP purchasing processes may not take advantage of premier agreements or other procurement pricing advantages.	Covered in 18-114 Purchasing	Report Submitted
Processes for off boarding visiting scientists (i.e., terminating access, collecting badges) may not be appropriate.	Covered in 19-109 C-Cure Badging System, 19-203 Guest Account System, Compliance A List Risk 14	C-Cure Badging audit currently in progress Guest Account report submitted
Title IX issues may not be investigated and/or resolved.	Title IX Committee, Compliance A List Risk 4	Monitor Developments
Policy/structure and oversight may not be adequate for UTP procurement processes.	Covered in 18-114 Purchasing	Report Submitted
Reporting requirements for MACRA may not be met.	Covered in 18-113 MACRA	Report Submitted
Relationships with hospital partners may be at risk.	Monitor Developments	Risk will be re-evaluated and will continue to monitor developments.
With changing reimbursement rules, our ability to maintain certain clinics may diminish.	Monitor Developments	Risk will be re-evaluated and will continue to monitor developments.
Decentralization of FMLA resulting in errors and potential noncompliance with the federal regulation.	Covered in 17-114 FMLA, Compliance A List Risk 3	Report Submitted
Employees may not be aware of the new HOOP policy for transporting information (PHI/PII).	Compliance A List Risk 11 & 12	Monitor Developments
Surgery or transplant procedure may not be billed due to lack of documentation in patient record.	Covered by Healthcare Billing Compliance Audits, Revenue Cycle Management, Compliance A List Risk 8 - 10	Monitor Developments
Fluctuation of Revenue generation.	Compliance A List Risk 2	Monitor Developments
Costs exceed revenue as services expand.	Covered by Revenue Cycle Management	Monitor Developments
Splunk alerts not configured for high- risk applications.	Covered by FY19 Splunk Alerting consulting project, Compliance A List Risk 11	Report Submitted
'Phishing attacks compromise passwords, resulting in breaches.	Covered by FY17 Phishing Attack Preparedness	Report Submitted
Sensitive UTH data is texted via unsecure methods.	Covered by FY19 Tiger Text Consulting, Compliance A List Risk 12	Report Submitted
A user inadvertently introduces malware while in the Citrix environment.	Covered by FY18 Citrix	Report Submitted

Clinical data is sold without an		
informed consent being obtained	UTHealth not currently	
from the patient.	selling data.	Monitor Developments
	Covered by FY19 Guest	
Guest account access is not	Account System,	
terminated on a timely basis.	Compliance A List Risk 14	Report Submitted
	Covered by FY18	
Telemedicine communications are	Telemedicine,	
not properly secured.	Compliance A List Risk 11	Report Submitted
Students/residents create private		
Facebook groups and share PHI with	Compliance A List Risk	
each other.	11, 15	Monitor Developments
	IT Audit monitors police	
	reports and verifies	
USBs or laptops go missing.	remediation	Monitor Developments
DSRIP registry is a big risk since it	Covered by FY18 SBMI	
contains so much PHI.	DSRIP Registry	Report Submitted
Process for requesting, approving,	Covered by FY19 Guest	
and issuing guest accounts may	Account System,	
need some scrutiny.	Compliance A List Risk 14	Report Submitted
Insufficient response/remediation to a	Covered by FY19	
breach.	CrowdStrike	Report Submitted
	Covered by FY19 IRB	
Data is shared without proper IRB	Process, Compliance A	D
approval.	List Risk 14	Report Submitted
	Covered by FY19 Guest	
No destrict the form of the control of	Account System,	
No training for guest account	Compliance A List Risk 11	B ( O . L
sponsors.	& 14	Repot Submitted
Destare sireum venting policies 9	Compliance A List Disk	
Doctors circumventing policies &	Compliance A List Risk	Manitar Davalanmenta
procedures.	11, 12, 15 & 16	Monitor Developments
Students place PHI into the non-	Covered by FY18 Google	
HIPAA compliant side of Google	Apps for Education,	Papart Submitted
Apps for Education.	Compliance A List Risk 11	Report Submitted
Risk associated with European Union	GDPR approach still not	
GDPR legislation.	formulated.	Monitor Developments
	IP identification/tagging &	
	related controls still under	
	consideration.	
	Confidential program put	
	into place by Legal and	
Foreign nationals are hired and	IT Security. Compliance A	Risk will be re-evaluated and will continue to
transfer intellectual property.	List Risk 14	monitor developments.

	Covered by FY18 Google	
	Apps for Education and	
BAAs are not in place.	FY19 Microsoft Office 365	Reports Submitted
	Being addressed with	
Facilities are taking on projects (e.g.,	senior management.	
software implementations) outside of	Compliance A List Risk 11	
their expertise.	& 14	Monitor Developments

Our risk assessment methodology included interviews and questionnaires to update the annual risk assessment. The identified risks were organized into institution-wide areas such as financial management, human resources management, and purchasing/warehousing. We developed detailed risk assessments of high-risk areas of research, information technology, and patient care. For each identified risk, probability and impact were determine using three to seven factors such as regulatory environment and frequency of identification in responses for the financial/operational risks and scope of process and age of system for IT risks.

#### VI. External Audit Services Procured in Fiscal Year 2018

Service	Provider
Opinion on financial statements of UT Physicians	Blazek & Vetterling LLP Certified Public
(501a Corporation supporting UTHealth)	Accountants
Opinion on financial statements of UT System	Blazek & Vetterling LLP Certified Public
Medical Foundation (a Corporation supporting UTHealth)	Accountants
Opinion on financial statements of Harris County	BKD Certified Public Accountants
Psychiatric Clinic (HCPC)	
Financial Statements FY 2018 Assurance Work	Deloitte and Touche LLP (Deloitte) Certified
	Public Accountants
Financial Statements FY 2019 Assurance Work	Deloitte and Touche LLP (Deloitte) Certified
	Public Accountants
2018 Statewide Single Audit, Follow-up to the	State Auditor's Office
Student Financial Assistance Cluster	
2018 Statewide Single Audit, Research and	State Auditor's Office
Development Cluster	
Financial Review for Southern Association of	Deloitte and Touche LLP (Deloitte) Certified
Colleges and Schools Commission on Colleges	Public Accountants
(SACSCOC)	
State Awards for the Cancer Prevention and	Deloitte and Touche LLP (Deloitte) Certified
Research Institute of Texas (CPRIT) Program	Public Accountants

#### VII. Reporting Suspected Fraud and Abuse

UTHealth's home page contains a link to information on how to report suspected fraud, waste, and abuse. The information has a link to the State Auditor's fraud reporting website and its hotline number, as well as information on the various ways to report suspected fraud internally. Institutional policies and procedures address the requirement to report fraud and the Standard of Conduct Guide, applicable to all employees addresses the reporting of fraud. The intranet sites of the departments of Institutional Compliance and Auditing & Advisory Services contain information and links for reporting suspected fraud.