

#### University of California Santa Cruz Internal Audit & Advisory Services

Annual Report on Local Activities
Fiscal Year 2014

September 12, 2014



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#### **Executive Summary of Control Environment**

Based on IAS projects completed during Fiscal Year 2014 as presented in Appendix A, along with risk assessment activities and representations made by management during the course of our reviews, there were several positive conditions that contributed to a healthy control environment. This included a strong campus culture focus on principles of community, senior leadership from the VC BAS and Campus Ethics and Compliance Officer in addressing process simplification and compliance efforts, and a receptive campus management culture to corrective actions proposed in reviews for addressing unacceptable campus risks and operational opportunities. Accordingly, we did not identify control weaknesses that we would categorize as materially significant. (1)

However, we observed specific weaknesses in the UCSC network of risk management, control, and governance activities. Most of these can be universally attributable to constrained resources and its impact on investment in administrative operations and institutional support. Five significant and recurring internal control issues/risks were identified as follows:

- Manual administrative processes and absence of automated systems the campus has limited resources available or directed for replacing manual paper driven processes with automated solutions.
- UC Path project continues to consume considerable campus resources and has displaced already stretched staff in key administrative support areas.
- Lack of Intrusion Detection System (IDS) and Intrusion Protection System (IPS) needed to monitor and protect campus information systems against cyber attacks.
- Decentralized activities some campus decentralized functions lack formal roles and responsibilities, consistency in guidance, and/or central oversight.
- Auxiliary or research activities several of which are valuable to the campus, but are resourced and/or modeled to be self supporting and require campus subsidy in order to continue to operate.



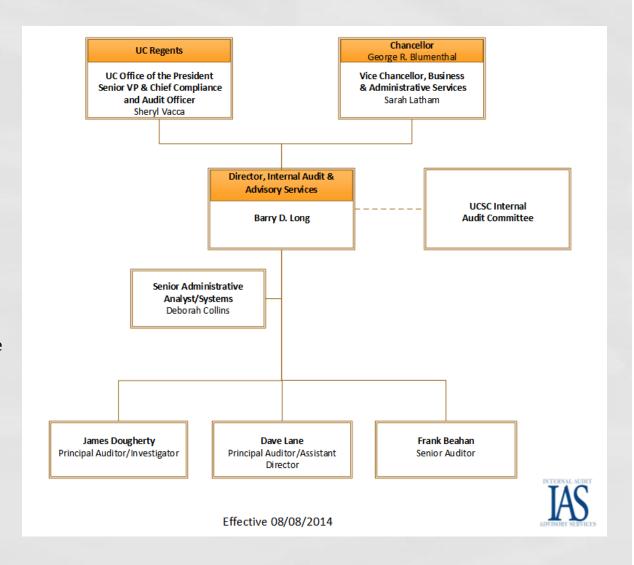


<sup>(1)</sup> Taken as a whole, the above statements do not mean to imply that fraud and other irregularities do not exist or are certain to be detected. No system of control provides absolute assurance that controls are functioning effectively. The acceptance of an appropriate level of risk given current resource constraints is management's responsibility. Maintaining an appropriate balance between risk and control will be a challenge during the coming years as constrained resources are not expected to keep pace of increasing demands

#### **About Us**

Internal Audit & Advisory Services (IAS) operates under UC Regents approved resolution as the University's independent and objective resource providing value added information and assurances to the Regents, president, and chancellor on the governance, risk management and internal control processes of the University.

IAS provides a critical assessment, monitoring, and consultative role; assisting the chancellor and senior management in the discharge of their oversight, management, and operating responsibilities; and is an integral part of the university's shared governance structure.







## **UC Internal Audit Charter**

In FY14, The Regents approved the updated UC Internal Audit Charter.

#### **Updates included:**

New UC Internal Audit Vision

"UC internal audit will be a universally recognized knowledgeable, collaborative and trusted resource on governance, risk management, and control."

 Clarification of the role of the Senior Vice President – Chief Compliance and Audit Officer (CCAO) and reporting relationship with The Regents.

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## Mission Statement - Scope of Work

The mission of internal audit is to provide the UC Regents, President, and Chancellors independent and objective assurance and consulting services designed to add value and to improve operations. It does this by assessing and monitoring the university community in the discharge of its oversight, management, and operating responsibilities. Internal audit brings a systematic, disciplined approach to evaluating and improving the effectiveness of risk management, control, and governance processes.

The scope of UCSC Internal Audit and Advisory Services (IAS) work is to determine whether UCSC's network of risk management, control, and governance processes, as designed and represented by management at all levels, is adequate and functioning in a manner to ensure:

- Risk management processes are effective and significant risks are appropriately identified and managed.
- Coordination of activities and communication of information among the various governance groups occurs as needed.
- Employee's actions are in compliance with policies, standards, procedures, and applicable laws and regulations.
- Financial and operational information is accurate, reliable, and timely.
- Resources are acquired economically, used efficiently, and adequately protected.
- Programs, plans, and objectives are achieved.
- The potential occurrence of fraud is evaluated and fraud risk is managed.
- Quality and continuous improvement are fostered in the organization's risk management and control processes.
- Significant legislative or regulatory issues impacting the organization are recognized and addressed properly, and
- Information technology governance supports UC strategies, objectives, and the organization's privacy framework.





# Accomplishments - FY14 at a Glance

Service Element	FY14 Accomplishments			
UC Regents/CCAO - Internal Audit Program	Successfully executed the FY14 Audit Plan as revised by completing 90% of the planned Audits and Consulting Services, including CCAO requested systemwide audits.			
Assist Campus Management in Discharge of Responsibilities	<ul> <li>At management's request, conducted the following Audits and Consulting Service Reviews:</li> <li>Arboretum Review, Website Links Pilot Project, UNEX Follow-up Review, Event Parking Permit Cash Controls, Dean's Travel Review, and NCAA Annual Review.</li> <li>Numerous informal consultations</li> </ul>			
Committees and Workgroups	Served on: Investigations Workgroup, IT Security Workgroup, HIPAA Workgroup, PCI Committee, and the Data Warehouse Steering Committee.			
Support to UC CCAO	Served on workgroup with another fellow UC Audit Director charged with updating the systemwide audit universe. Appointed by UC CCAO to serve on the UCOP Policy Advisory Committee.			
Governance	Identified notable observations addressing governance by conducting the following audits: Facility Project Cost and Campus Background Checks.			
Risk Management and Compliance	Supported Campus Ethics and Compliance Officer (CECO) in carrying out campus compliance program and UCOP requests.  Notable observations addressing risk management and compliance over by conducting audits of: Financial Aid Compliance, Sub-Cashier Cash Handling Controls, PCI Compliance, Campus IT Equipment Disposition Practices, Distributed Computing – Logical Security.			
Audit Follow-up	Closed 42 open management corrective actions in the follow-up system.			





# FY14 Audit Plan Completion

		Planned Complete Quarter/Status		Actual		
Audit # Audit Title	State	Q1	Q2	Q3	Q4	Issue Date
Planned New Audits/ *Supplemental Audits						
SC-14-01 Student Health (Systemwide)	Dropped					No Report
SC-14-02 Deferred/Preventative Maintenance	Final					08/14/13
SC-14-03 Financial Aid Compliance	Final					11/06/13
SC-14-04 Sub-Cashier Cash Handling Controls	Final					01/24/14
SC-14-05 PCI Merchant Compliance	Final					05/09/14
SC-14-06 Campus IT Equipment Disposition Practices	Final					07/03/14
SC-14-07 Distributed Computing Logical Security	DNF					08//21/14
SC 14-08 Employee Off Boarding/Termination Procedures	Dropped					Dropped
SC-14-09 Facilities Projects Costs	Final					05/09/14
SC-14-10 Campus Background Checks						05/09/14
SC-14-11 Dean's Travel Review (Systemwide)	Final					09/10/13
SC-14-12 Event Parking Permit Cash Controls	Final					10/17/13
Advisory Services						
SC-14-50 Travel/Entertainment Process Streamlining						Closed
SC-14-51UC Path/Shared Initiative (Systemwide)						Closed
SC-14-58 NCAA Report Annual Review	Final					01/10/14
SC-14-57 Website Links Pilot Program	Final					12/20/13
SC-14-59 Arboretum Review	Final					05/05/14
Investigations						

C - Closed/Completed (no report), DR - Dropped, A - Active, RD - Report Draft, RF - Report Final, DNF – Did Not Finish





# **Audit Productivity and Plan Completion**

For FY14, IAS completed the audit plan by carefully managing time commitments. Refer to table below. IAS completed a total of 10 planned audits, 4 consultation service reviews, and no investigations. (see Appendix A). Two audits were dropped/cancelled and replaced with two reviews with approval from the audit committee.

FY14 Audit Plan		
Total # of Audits Planned	10	
Total # of Supplemental Audits	2	
Total # of Planned Audits Dropped/Cancelled (Approved by the Audit Committee)	< 2 >	
Total Audits as Amended	10	
Total Planned Audits Completed	9	Appendix A
Overall Audit Plan Completion	90%	
Planned Advisory Services	2	
Unplanned Advisory Services – Added	2	
Planned Advisory Services – Dropped/Cancelled	< 0 >	
Total Advisory/Consultation Services as Amended	4	
Total Consultation Services Completed	4	Appendix A
Investigations –Added	0	
Total Investigations Completed	0	Appendix A





#### FY 14 - Distribution of Audit Resources

Direct hours (3.7 actual FTE, down 1.5 FTE from the past two years) were charged as follows:

Planned/Supplemental Audits: 58%

Advisory Services: 17%

Investigations: 0% Audit Support: 5%

In summary, 80% of net available hours of the IAS office were spent on direct audit activities.

GROSS & NET AVAILABLE HRS CALCULATION	Plan	Actual	Var.
Gross Available Hours	8352	7776	576
Non Controllable Hours	1694	1260	434
Total Net Available Hours	6658	6516	142
INDIRECT HOURS	Plan	Actual	Var.
Administration	682	1109	-427
Professional Development	182	185	-3
Other	0	0	0
Total Indirect Hours	864	1294	-430
Total Indirect Percent	13%	20%	-7%
DIRECT HOURS	Plan	Actual	Var.
Audit Program			
Planned Carried Forward Audits	0	0	0
Planned New Audits	2727	3226	-499
Supplemental Audits	288	229	59
Unplanned Carried Forward Audits	0	0	0
Audit Followup	182	316	-134
Total Audit Program Hours	3197	3771	-574
Total Audit Program Percent	48%	58%	-10%
Advisory (Consulting) Services			
Consultations/Spec. Projects (SC)	1247	990	257
Ext. Audit Coordination (SE)	31	8	23
Internal Control & Accountability (SI)	1	26	-25
IPA, COI & Other (SP)	1	0	1
Compliance Support (SU)	1	100	-99
Systems Dev., Reeingineering Teams, etc. (SR)	1	1	0
Total Advisory Services Hours	1282	1125	157
Total Advisory Services Percent	19%	17%	2%
Investigations Hours	659	0	659
Investigations Percent	9.90%	0.00%	9.90%
Total Audit Support Hours	656	326	330
Total Audit Support Percent	10%	5%	5%
Total Direct Hours	5794	5222	545
Total Direct Percent	87%	80%	7%





### Audit Coverage By Subject Area

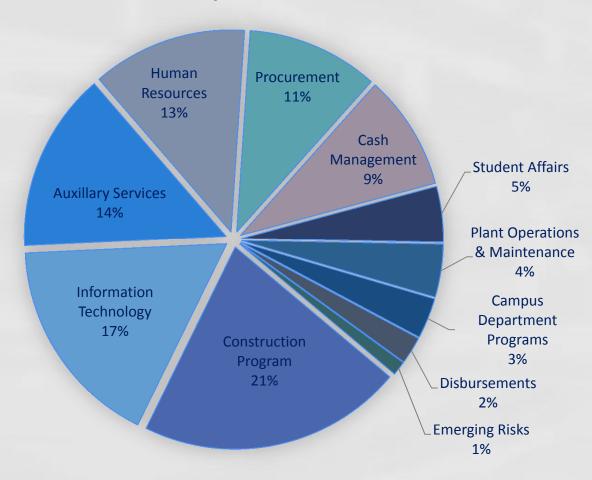
The Annual Audit Plan for FY14 included a wide variety of operational, compliance, governance, financial, and information systems audits.

The allocation of internal audit resources was risk-based, designed to provide depth and breadth of coverage for all areas of campus operations.

Many audits also included an information technology component.

The UCSC Annual Audit Plan is approved each year by the UCSC Audit Committee. IAS has never been prevented from conducting any review recommended and submitted to the UCSC Audit Committee for approval.

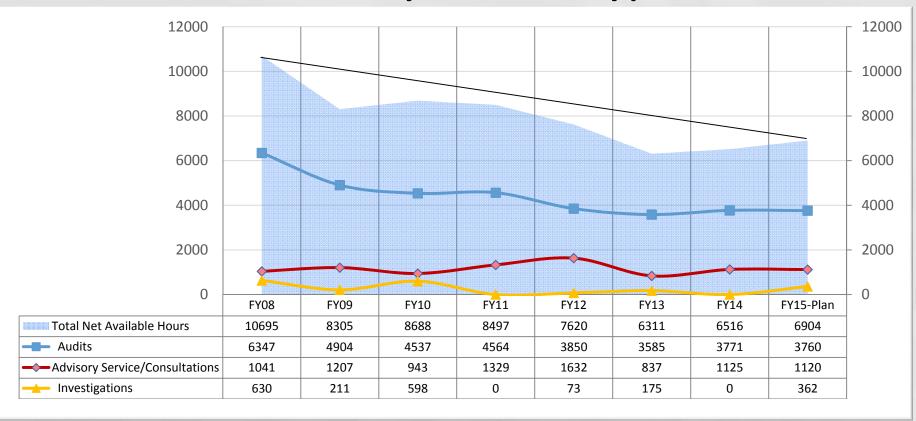
## Distribution of FY14 Hours by Subject Area







## Effort Distribution by Service Type



A trend analysis of IAS actual hours by service type displays the number of hours each year devoted to Audits, Consultation Services, and Investigations. Although our focus is on the planned audit program, hours are also dedicated to consultation services and investigations. These hours fluctuate yearly based on local needs.





## Audit Project Summaries – Top 10 from FY14

(available upon request)





### Investigations

Investigations are coordinated and managed by a campus-wide Investigations Workgroup, chaired by the Locally Designated Official (LDO) for Whistleblower matters. The Investigations Workgroup triages, assigns, and tracks all allegations of misuse and improver governmental activities in accordance with the University of California Whistleblower Policy.

IAS conducts investigations involving allegations of known or suspected misuse of University resources, including fraud, financial irregularities, significant weaknesses in internal controls, and the financial consequences of other matters under investigation:

During FY14 there were no investigations conducted by IAS.





## Management Corrective Actions (MCAs)

IAS monitors the progress and completion of each of the Management Corrective Actions (MCAs) identified to address unmitigated risks and opportunities for operational efficiency improvements noted in the audits, advisory services, and investigations we perform. Timely closeout of MCA's demonstrates management's commitment to risk mitigation and operational improvement. IAS obtained agreements from management on all corrective actions identified and reported in for audits issued in FY14.

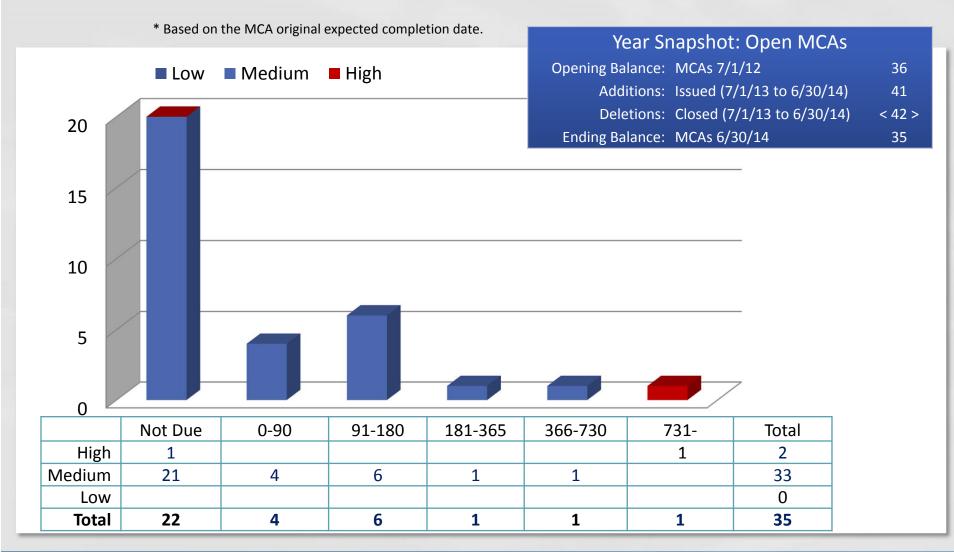
In FY14, IAS closed 42 corrective actions completed by management. Reports issued in FY14 resulted in 41 new MCAs added, for a total of 35 open MCAs as of June 30, 2014.

	MCAs Open as of 07/01/2013	MCAs Added During FY14	MCAs Closed During FY14	MCAs as of 06/30/2014
Total	36	41	(42)	35





# Aging Report Open MCA's as of 6/30/2014







### Local Program Initiatives/Campus Committees

#### Support to Campus Ethics and Compliance Officer (CECO)

IAS continued to provide consultation and support to the campus CECO in carrying out the campus compliance program.

#### **Student Intern Program**

IAS continues to administer a student intern program. This program contributes to the campus educational mission by offering students an opportunity to work within the internal audit office, and gaining hands on internal auditing experience. During FY14, IAS hosted two student interns. Interns are typically senior level UC Santa Cruz accounting students. Most interns have received full time jobs subsequent to graduation, directly attributable to this experience and the education they have received at UC Santa Cruz.

#### **Quarterly MCA Reporting to Principal Officers**

IAS issues a Quarterly Open Management Corrective Actions (MCA) report to campus principal officers to help them oversee the mitigation efforts agreed on to address campus risks identified in audits.

#### **Investigations Workgroup**

The IAS director is a member of the campus investigations workgroup. This workgroup assists the campus Local Designated Official (LDO) in assigning investigation cases to the appropriate campus organization for resolution. This includes identifying whistleblower cases involving improper governmental activities and requested internal audit participation and support.





### Local Program Initiatives/Campus Committees

#### **Information Security Teams**

Provided advice on computing security, policy and procedures and participated on UC Santa Cruz information security teams:

- Payment Card Industry Security Team
- Security Policy Team
- Information Security Team
- HIPAA Security and Privacy Rule Team
- Computing Security Incident Response Team

#### Website Link Initiative

In collaboration with the Campus Website Steering Committee, Internal Audit and Advisory Services (IAS) has initiated a Website Link Initiative/Pilot Project. The objective of this IAS initiative is to establish, as an on-going consulting service, assistance to campus units in the identification and correction of website broken links by applying an automated website broken links tool to selected campus websites, share the results with departmental web website editors, and assist units in correcting the most critical broken web links.

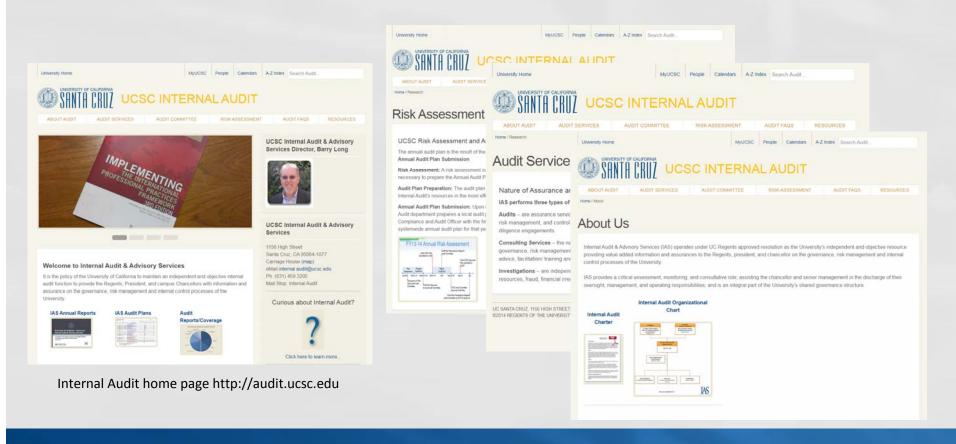




## **IAS Quality Improvement Efforts**

#### **Improved IAS Website:**

Internal Audit continues to manage and update our online presence via the website. We monitor the visits to individual pages on the site to better deliver important information to key stakeholders.





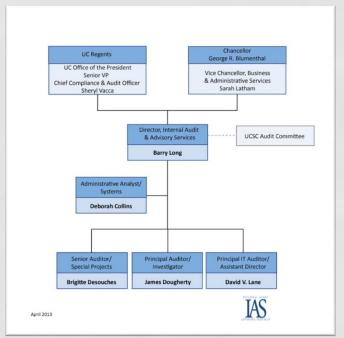


#### Campus Audit Governance

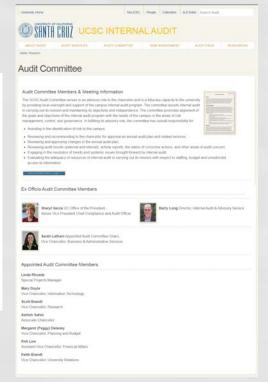
The UCSC internal audit director and staff report administratively to the Chancellor through the VC BAS, and to Regents' Committee on Compliance and Audit, through the Senior Vice President – Chief Compliance and Audit Officer, and has direct access to the President or The Regents Committee on Compliance and Audit as the circumstances warrant.

During FY14, three audit committee meetings were held and facilitated by IAS. Highlights of actions taken to update and improve campus audit governance activities and communication between IAS and the campus

audit committee using a new presentation format (Prezi):





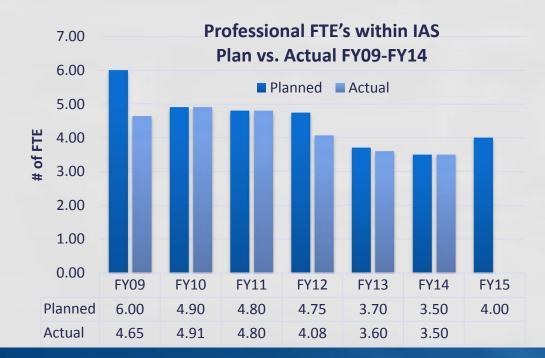






# Staffing / Resources

- For FY14, IAS had a permanent budget of 4.0 FTE professional staff.
- Existing IAS resource levels are low relative to other UC campuses, and do not allow for a breath of coverage needed to provide a recommended level of assurance to senior management on the adequacy of the campus control environment.



IAS staff are formally educated in the areas of Management, Bus.
Administration, Accounting, & Sociology.



Current IAS staff have an average of 16 years audit experience.



UCSC IAS staff have a unique balance of skill sets.



IAS staff members are highly qualified, credentialed, and certified.

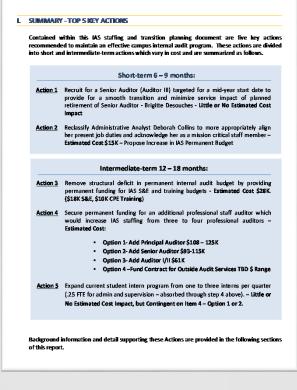


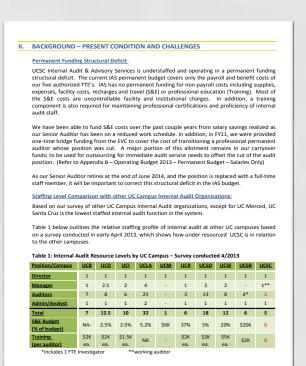


## Internal Audit Staffing and Transition Plan

The VC BAS provided support, enabling IAS to secure a level of funding to address the short-term actions identified in last years internal audit staffing and transition plan. This plan was developed to identify and communicate actions needed to provide a continuity of internal audit operations in the short and intermediate term.











# **Appendices**





## Appendix A

#### Internal Audits Projects Completed FY14

	Issue Date	Audit #	Audit Title
Audit	S		
1	08/14/13	SC-14-02	Deferred/Preventative Maintenance
2	11/06/13	SC-14-03	Financial Aid Compliance
3	01/24/14	SC-14-04	Sub-Cashier Cash Handling Controls
4	05/09/14	SC-14-05	PCI Merchant Compliance
5	07/03/14	SC-14-06	Campus IT Equipment Disposition Practices
6	05/09/14	SC-14-09	Facilities Projects Costs
7	05/09/14	SC-14-10	Campus Background Checks
8	09/10/13	SC-14-11	Dean's Travel Review (Systemwide)
9	10/17/13	SC-14-12	Event Parking Permit Cash Controls
Advis	ory Services		
1	06/30/14	SC-14-50	Travel/Entertainment Process Streamlining
2	12/20/13	SC-14-57	Website Links Pilot Program
3	01/10/14	SC-14-58	NCAA Report Annual Review
4	05/05/14	SC-14-59	Arboretum Review
Inves	tigations		
			None



