THE TEXAS ⭐ STATE UNIVERSITY SYSTEM®

Office of Internal Audit

Audit and Compliance Plan
Fiscal Year 2026

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INTRODUCTION AND PURPOSE

The *Fiscal Year 2026 Audit and Compliance Plan* ("the Plan") documents functional areas the Office of Internal Audit intends to devote resources to during fiscal year 2026. The Plan satisfies statutory responsibilities outlined in Section 2102.008 of the Texas Government Code, the Texas State University System (TSUS) *Rules and Regulations*, and applicable auditing standards. The number of hours budgeted to perform all activities in the Plan totals 28,324.

Plan Categories
The Plan is divided into three different categories:
> ➢ Statutory/Required Audits and Activities: Projects required by law or by external oversight entities for all Components and System Administration (except where noted).
> ➢ Risk-Based Functional Areas: Projects allocated amongst the Components based on risks identified during the annual risk assessment process and subsequently categorized by functional area. See the section entitled "Risk Assessment Process" below for more information.
> ➢ Other Activities: Projects required by grant agreements or third parties, consulting and advisory services, special projects such as time-sensitive investigations and management-requested reviews, identification and communication of emerging compliance requirements, liaising with external auditors, and other functions designed to assist management in mitigating risks.

Risk Assessment Process
Because of the increase in the number of statutorily required projects and activities, as well as legislative initiatives, audit and compliance resources available for risk-based projects have diminished. Therefore, it is critical that such projects focus on areas where our independent reviews will provide the most value to the TSUS. In order to identify such projects, the Office of Internal Audit uses a two-phase risk assessment process.

The first phase of the risk assessment is the annual risk assessment, used to build this Plan. Texas Government Code 2102.005 requires audit plans to be developed "*using risk assessment techniques.*" The collective risk assessment activities performed at the Components and System Administration in developing this Plan included, but were not limited to, the following activities:
> ➢ Soliciting input from the Board of Regents, the Chancellor, Vice-Chancellors, Component Presidents, and Component management;
> ➢ Consulting with oversight entities regarding emerging concerns;
> ➢ Considering national trends within higher education;
> ➢ Evaluating materiality;
> ➢ Assessing the potential impact of negative public scrutiny;
> ➢ Considering prior year projects still in progress during development of the Plan; and
> ➢ Utilizing professional judgment and knowledge gained from prior projects regarding areas of risk and information gained through continual risk assessment discussions with management throughout the year.

The risk assessments considered a myriad of risks, including those associated with:
> ➢ Utilization of artificial intelligence within and outside of the TSUS;
> ➢ The potential for waste, fraud, and abuse;
> ➢ Methods for ensuring compliance with contracting processes and controls and for monitoring contracts, as required by Texas Government Code, Section 2102.005(b);
> ➢ Calculations and application of benefits (benefits proportionality);
> ➢ Turnover in key positions; and

> ➢ Information technology risks (including those associated with Title 1, Texas Administrative Code, Chapter 202, *Information Security Standards).*

The risk assessments also considered work performed by external auditors, risk appetites, and activities where assurance or consulting engagements would be most helpful to management.

Upon completion of the annual risk assessments, identified risks were categorized into various functional areas based on the various organizational structures within the TSUS, the Risk Dictionary classifications created by the *Association of College and University Auditors*, and the functional expense classifications promulgated by the *National Association of College and University Business Officers* for financial statement reporting purposes.

Each functional area contains numerous activities, processes, and operations that could be the subject of an audit (see Appendix A). Except for compliance reviews (which are typically conducted on a system-wide basis), the various functional areas and the specific projects selected for review in those functional areas vary amongst the Components and System Administration depending on the level of risk. For example, a project in the Financial Management functional area at Lamar University could involve an audit of accounts payable, while a project in the Financial Management functional area at Sul Ross State University could involve an audit of accounts receivable. There could be no projects (or multiple projects) in the Financial Management functional area at Sam Houston State University.

The second phase of the risk assessment occurs when audit resources become available to commence a project in a designated functional area. Although the first phase of the risk assessment provides clear indicators of auditable units that would benefit from review, some units are of higher risk than others and sometimes risks identified during the annual risk assessment become mitigated as time passes. Therefore, as project planning begins, we conduct additional assessments to pinpoint the activities best suited for review. This approach affords flexibility to ensure emerging risks are timely reviewed. As required by the State Auditor's Office, the risk assessments also identified and documented areas of high risk that were not included in the Plan; these areas will be reported under separate cover in the Internal Audit Annual Report for 2025, due in October 2025.

As in prior years, there may be circumstances that require us to devote resources to activities not outlined in the Plan. Per the *Rules and Regulations*, significant changes to the Plan require approval by the Chair of the Finance and Audit Committee.

The Plan appears on the following page. Blue checkmarks represent functional areas where one or more audit projects are planned; green checkmarks represent functional areas where one or more compliance projects (across all Components) are planned. Finite resources preclude reviews in every functional area, including those known to have higher risks. Therefore, the absence of checkmarks in the Plan for risk-based projects means that no work is planned in the corresponding functional area(s).

TEXAS STATE UNIVERSITY SYSTEM
AUDIT AND COMPLIANCE PLAN - FISCAL YEAR 2026

Legend: 🔵 = One or more planned audit project(s) 🟢 = One or more planned compliance project(s)

STATUTORY/REQUIRED AUDITS AND ACTIVITIES	LU	SHSU	SRSU	TXST	LIT	LSCO	LSCPA	System Administration
SB 20 – Annual Policy Review & Contract Administration	🔵	🔵	🔵	🔵	🔵	🔵	🔵	🔵
Quarterly Follow-Up Reviews	🔵🟢	🔵🟢	🔵🟢	🔵🟢	🔵🟢	🔵🟢	🔵🟢	🔵🟢
Risk Assessment/Audit & Compliance Plan (for FY 2027)	🔵🟢	🔵🟢	🔵🟢	🔵🟢	🔵🟢	🔵🟢	🔵🟢	🔵🟢
Annual Internal Audit Report (for FY 2025)	🔵🟢	🔵🟢	🔵🟢	🔵🟢	🔵🟢	🔵🟢	🔵🟢	🔵🟢
Joint Admission Medical Program	🔵							
NCAA Compilation		🔵						
Title IX Quarterly and Annual Reporting	🟢	🟢	🟢	🟢	🟢	🟢	🟢	🟢
Continuing Education	🔵🟢	🔵🟢	🔵🟢	🔵🟢	🔵🟢	🔵🟢	🔵🟢	🔵🟢
State-Mandated Training (Compliance Office)								🟢

RISK-BASED FUNCTIONAL AREAS (See Appendix A)	LU	SHSU	SRSU	TXST	LIT	LSCO	LSCPA	System Administration
Auxiliary Enterprises	🔵	🔵		🔵				
Instruction and Academics	🟢	🔵🟢	🔵🟢	🔵🟢	🟢	🟢	🟢	🟢
Health & Safety	🟢	🔵🟢	🟢	🔵🟢	🟢	🟢	🟢	🟢
Financial Management	🔵	🔵	🔵	🔵				
Student Services	🟢	🟢	🟢	🔵🟢	🟢	🟢	🟢	🟢
Enrollment Management	🔵🟢	🔵🟢	🟢	🟢	🟢	🟢	🟢	🟢
Research & Grants	🟢	🔵🟢	🔵🟢	🔵	🟢	🟢	🟢	🟢
Construction & Physical Plant		🔵		🔵			🔵	🔵
Information Technology	🔵	🔵	🔵	🔵	🔵	🔵	🔵	🔵
Artificial Intelligence Governance	🔵	🔵	🔵	🔵	🔵	🔵	🔵	🔵
Institutional Support (including SB 17 and SB 37 projects)	🔵	🔵	🔵	🔵	🔵	🔵	🔵	🔵

OTHER ACTIVITIES	LU	SHSU	SRSU	TXST	LIT	LSCO	LSCPA	System Administration
Special Projects	🔵🟢	🔵🟢	🔵🟢	🔵🟢	🔵🟢	🔵🟢	🔵🟢	🔵🟢
Internal Audit Software Solution Project	🔵	🔵	🔵	🔵	🔵	🔵	🔵	🔵
Audit & Compliance Liaison Activities	🔵🟢	🔵🟢	🔵🟢	🔵🟢	🔵🟢	🔵🟢	🔵🟢	🔵🟢
Clery Act Reviews	🟢	🟢	🟢	🟢	🟢	🟢	🟢	🟢
State Due Date Database	🟢	🟢	🟢	🟢	🟢	🟢	🟢	🟢

🔵 = One or more planned audit project(s)   🟢 = One or more planned compliance project(s)

APPENDIX A
RISK-BASED FUNCTIONAL AREAS

This chart depicts examples of (but not all) subprocesses/activities within each functional area, many of which overlap. These activities represent potential auditable units; however, some activities inherently have higher risks than others. Artificial intelligence, compliance, fraud, and information technology risks surround all of the functional areas and exist within all operations and were considered in the development of the Plan.

ARTIFICIAL INTELLIGENCE RISKS

INFORMATION TECHNOLOGY RISKS

COMPLIANCE RISKS

FRAUD RISKS

INSTRUCTION & ACADEMICS
Administration
Academic Progress
Ancillary Activities (Theater, Rodeo)
Records (Grades)
Charter Schools
College of Osteopathic Medicine
Course Overloads
Course "Make"
Curriculum Development
Degree Planning
Distance Learning
FERPA
Faculty Workloads
Tuition and Fee Rates
Institutional Reporting
Libraries / Museums
Recruiting (including Athletics)
Retention
Study Abroad

AUXILIARY ENTERPRISES
Athletics
Bookstore
Child Development
Faculty Club
Food Services
Museums
Other External Services
Parking
Recreational Centers
Residence Halls
Service Centers
Special Events Centers

HEALTH & SAFETY
ADA Access
Background Checks
Disaster Recovery
Emergency Preparedness & Drills
Environmental Health & Safety
Fire Safety
Lab Safety
Risk Management
Student, Faculty, & Staff IDs
Title IX
University Police

STUDENT SERVICES
Greek Life
Health Services
Mental Health Services
Disability Services
Recreational & Athletic Centers
Student Centers & Activities
Student Housing
Student Judicial Affairs
Student Legal Services
Student Organizations
Support for Athletes
Testing Centers

FINANCIAL MANAGEMENT
Accounting
Accounts Payable
Accounts Receivable
Asset Management
Bonded Debt
Budgeting
Business Continuity
Capital Assets & Depreciation
Cashiering
Cash Flow Management
Financial Reporting
Grants Accounting
Human Resources
Inventories
Investments
Payroll
Public Private Partnerships
Purchasing
Revenue Collection
Revenue Generating Activities
Strategic Financial Management
Treasury Services
Unrelated Business Income Tax

RESEARCH & GRANTS
Animal Testing
Export Controls
Human Subjects
Intellectual Property & Technology Transfer
Pre-award & Award Acceptance
Post-award Administration
Research Facilities
Quality & Oversight
Research Security
Small Business Development Centers
Trademark & Copyright Licensing

ENROLLMENT MANAGEMENT
Admissions
Career Counseling
Financial Aid
Registration
Scholarships & Fellowships
Veterans' Affairs

OUTSOURCED SERVICES
Custodial
Distance Learning
Food Services
Housing
Landscaping
Maintenance
Parking
Project Management

HEALTH CARE OPERATIONS
Access
Charge Capture and Collection
Health Care Center Facilities
Patient Information (HIPAA)
Pharmacy
Student Injury Reporting

INSTITUTIONAL SUPPORT
General Administration
Alumni Relations/Development
Endowments
Foundations
Fundraising
Marketing
Public and Governmental Relations
Self-Supporting Enterprises
University Support for Foundations

CONSTRUCTION & PHYSICAL PLANT
Construction Management
Space Utilization and Reporting
Building Maintenance
Custodial Services
Landscape & Grounds
Renovations
Physical Plant
Utilities