The University of Toledo
Finance and Audit Committee Meeting

“Internal Audit and Compliance Update”

January 11, 2016
## Projects Completed

Higher Learning Commission Preparedness  
(federal compliance)
Higher Learning Commission Preparedness  
(resource allocation)
IT Risk Assessment/Cybersecurity
Department of Music
Research & Sponsored Programs
Student Financial Aid
Outside Income (Athletics)
Revenues/Expenses (Athletics)
Academic Accommodations (ADA)
Main Campus (ADA)
Access to Medical Records
Addiction Recovery Program
Cardiovascular Unit
Dana Cancer Center
Endoscopy Department
Horizon Patient Portal
Meaningful Use
Pain Management Department
Pharmacy Logs
Health Science Campus (ADA)

## Projects in Progress

Accounts Payable
Financial Aid Disclosures
Incentive Compensation
Information Technology General Controls
Management of Research Grants
Payment Card Industry (PCI) Compliance
Football Attendance (Athletics)
Central Distribution Supply Inventory Management
Clinical Trials
Surgical Supply Center Inventory Management

## Projects to Be Kicked off

Clery Act Compliance
Institutional Compliance Program /  
Enterprise Risk Management
Payroll Processing
Research Compliance
State Authorization Requirements
Title IX
Compliance (Athletics)
Compliance (ADA)
Healthcare Compliance
Simulation Center
Significant Projects Currently Progressing

• Cybersecurity
  √ PCI
  √ IT Risk Assessment
  √ Privacy and Security
  √ IT General Controls

• Payroll Processing

• Clery Act

• Healthcare Compliance

• Institutional Compliance
Internal Audit Recommendations

• UT Internal Audit and Compliance follows up on the status of corrective actions on all high- and medium impact recommendations from its reports.

• This can be accomplished as follows:
  ✓ Follow-up audit several months after the initial audit
  ✓ Following up on individual recommendations shortly after their due date

• A follow-up audit report will be issued when corrective actions have not been implemented.

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Institutional Compliance Program

- A common, flexible, framework for assessing institutional compliance is being formulated

- A network of compliance officers from across campus is being assembled, and their activities within this framework is being organized
  - provisions of relevant laws and regulations
  - map to UT policies and procedures
  - identify gaps in UT policies and procedures with respect to the laws
  - test compliance with procedures
  - identify compliance gaps
  - develop and implement action plans to address the above gaps
  - monitor progress and re-test, if necessary

- Quarterly status reporting to University leadership from this Program

- Annual reporting to the Board by major compliance area from this Program (June)

- We will report high risk compliance issues to the Board as we become aware of them

- The cooperation and support of UT leadership and the Board in implementing this program is critical
An important component of the Institutional Compliance Program discussed in the previous slide

The Clery Act requires all colleges and universities that participate in Federal financial aid programs to keep and disclose information about crime on and near their respective campuses

Requirements of Act

- annual security report
- crime log
- timely warning
- crime statistics

The University recently invested in a full-time Clery Act Compliance Officer (Meredith Blaine)

There are several intersections between Clery and Title IX, but each also have different scopes and reporting requirements

The Clery Act is a Federal law; as such, the cooperation and support of UT leadership and the Board in complying with its provisions is critical