



COMMITTEE ON AUDIT AND COMPLIANCE
PRE-MEETING AGENDA
Monday, February 5, 2024
11:30 a.m. or at the conclusion
of the FSPPM Pre-Meeting beginning at 10:30 a.m.
Virtual Meeting: (646) 558-8656, ID# 956 9452 9804

Committee Members:

Daniel T. O’Keefe (Committee Chair), David L. Brandon, Richard P. Cole, Olivia E. Green, Morteza “Mori” Hosseini (Board Chair), Rahul Patel (Board Vice Chair), Marsha D. Powers

- 1.0 Call to Order and Welcome Daniel T. O’Keefe, Chair
2.0 Roll Call Board Staff
3.0 Review Draft Agenda for March Meeting Daniel T. O’Keefe, Chair
3.1 Review Draft Minutes
• December 7, 2023
3.2 Review Discussion Items
• Internal Audit Activity..... Dhanesh Raniga, Chief Audit Executive
• Compliance and Ethics Office Updates.....Terra DuBois, Chief Compliance Officer, and Amy Hass, Vice President and General Counsel
4.0 New Business..... Daniel T. O’Keefe, Chair
5.0 Adjourn..... Daniel T. O’Keefe, Chair



COMMITTEE ON AUDIT AND COMPLIANCE

Meeting Minutes

December 7, 2023

President's Room 215B, Emerson Alumni Hall

University of Florida, Gainesville, Florida

Time Convened: 2:21 p.m.

Time Adjourned: 2:25 p.m.

Committee and Board members present:

Daniel T. O'Keefe (Committee Chair), David L. Brandon, Richard P. Cole, Olivia E. Green, Morteza "Mori" Hosseini (Board Chair), Rahul Patel (Board Vice Chair), Marsha D. Powers, Fred S. Ridley, Danaya C. Wright, Patrick O. Zalupski, and Anita G. Zucker.

Others present:

Ben Sasse, President; Scott Angle, Interim Provost and Senior Vice President for Academic Affairs; Melissa Curry, Vice President for Human Resources; Kurt Dudas, Vice President/Jacksonville Lead; Elias Eldayrie, Vice President and Chief Information Officer; Robert Gilbert, Interim Senior Vice President for Agriculture and Natural Resources; Amy Hass, Vice President and General Counsel; Taylor Jantz, Office of the Chief Financial Officer; Mark Kaplan, Vice President for Government and Community Relations and University Secretary; Jim Kelly, Interim Chief Executive Officer for UF Health Shands; David Kratzer, Senior Vice President for Construction, Facilities, and Auxiliary Operations; Maria Gutierrez Martin, Interim Vice President for Advancement; Marsha McGriff, Chief Diversity Officer; David Nelson, Senior Vice President for Health Affairs and President of UF Health; David Norton, Vice President for Research; Mary Parker, Vice President and Chief Enrollment Strategist; Curtis Reynolds, Vice President for Business Affairs; Raymond Sass, Vice President for Innovation and Partnerships; Jim Staten, Senior Advisor to the President; Scott Stricklin, Director of Athletics; James Wegmann, Vice President for Communications; Heather White, Vice President for Student Life; Terra DuBois, Chief Compliance, Ethics, and Privacy Officer; Colt Little, Associate Vice President for Enterprise Projects and Senior Counsel; Kate Moore, Director of Compliance and Ethics and Deputy Chief Compliance Officer; Dhanesh Raniga Chief Audit Executive; members of the University of Florida community, and the public.

1.0 Call to Order and Welcome

Committee Chair O'Keefe welcomed everyone in attendance and called the meeting to order at 2:21 p.m.

2.0 Verification of Quorum

Chief Compliance, Ethics, and Privacy Officer (CCO) Terra DuBois verified a quorum with all members present.

3.0 Review and Approval of Minutes

Committee Chair O’Keefe asked for a motion to approve the minutes of the June 8, 2023 committee meeting and November 13, 2023 committee pre-meeting, which was made by Trustee Brandon, and a second, which was made by Trustee Powers. The Committee Chair asked for further discussion, and then asked for all in favor of the motion and any opposed and the motion was approved unanimously.

4.0 Action Items

Committee Chair O’Keefe presented three action items for Board approval that were discussed at the November 13, 2023 committee pre-meeting.

AC1 University of Florida Performance Based Funding and Preeminent Status Metrics Data Integrity (Audit Report) and Annual Data Integrity Certification

Committee Chair O’Keefe asked for a motion to accept the University of Florida Performance Based Funding and Preeminent Status Metrics Data Integrity (Audit Report) and approve the Performance Based Funding Data Integrity Certification, which was made by Trustee Cole, and a second, which was made by Trustee Powers for recommendation to the Board for its approval on the Consent Agenda. The Committee Chair asked for further discussion, and then asked for all in favor of the motion and any opposed, and the motion was approved unanimously.

AC2 Charter Review: UF Compliance and Ethics Charter

Committee Chair O’Keefe asked for a motion to approve UF Compliance and Ethics Charter which was made by Trustee Green, and a second, which was made by Trustee Cole for recommendation to the Board for its approval. The Committee Chair asked for further discussion, and then asked for all in favor of the motion and any opposed, and the motion was approved unanimously.

AC3 Institutional Compliance FY23 Annual Report

Committee Chair O’Keefe asked for a motion to approve the Institutional Compliance FY23 Annual Report which was made by Trustee Cole, and a second, which was made by Trustee Powers for recommendation to the Board for its approval. The Committee Chair asked for further discussion, and then asked for all in favor of the motion and any opposed, and the motion was approved unanimously.

4.0 New Business

There was no new business to come before the committee.

5.0 Adjourn

There being no further discussion, Committee Chair O’Keefe adjourned the meeting at 2:25 p.m.

AUDIT AND COMPLIANCE COMMITTEE PRE-MEETING

FEBRUARY 5, 2024

SUMMARY OF INTERNAL AUDIT ACTIVITY

Presented by:

Dhanesh Raniga, Chief Audit Executive

Joe Cannella, Audit Director

OFFICE OF INTERNAL AUDIT

Fiscal Year 2023-24 Internal Audit Plan Summary*

INTERNAL AUDIT AREA	INTERNAL AUDITS COMPLETED (CURRENT PERIOD)	FINAL REPORT STAGE	INTERNAL AUDITS COMPLETED & PREVIOUSLY REPORTED	IN PROGRESS/ PLANNING INTERNAL AUDITS	PLANNED INTERNAL AUDITS	TOTAL
University of Florida Operations	1	2	8	7	10	28
University of Florida Foundation			1	1	1	3
University Athletic Association			1		4	5
TOTAL	1	2	10	8	15	36

**Please refer to Appendix A for complete details of FY2023/24 Internal Audit Plan status*

OFFICE OF INTERNAL AUDIT

Current Internal Audit Reports and Other Matters

- We completed the following internal audit since our last report to the Audit and Compliance Committee in December 2023:
 - Transfer Student Admissions
- We followed up on twenty-seven audit report recommendations that were due for implementation by management. While management has requested additional time for some of the recommendations, internal audit is currently evaluating those that have been completed for evidence of documentation. A report on the follow-up results will be prepared and presented at the March 2024 Audit and Compliance committee meeting.
- University Athletic Association (UAA) – Conducted a high-level risk assessment and developed a FY24 internal plan for UAA. Four new projects were recommended to the UAA Audit Committee.
- FY24 Internal Audit Plan Changes
 - UFGO Travel, which is a new travel management system, is one of the projects approved in the FY24 internal audit plan. Based on user feedback, system changes will be made, and certain business processes may change. Management would like the system to be operational for some time so that any operational issues can be addressed. As a result, they have requested that the internal audit be delayed to August/September 2024.
 - Americans with Disabilities Act (ADA) Compliance – The Office of General Counsel has engaged a third-party vendor to evaluate Title IX and ADA Compliance. It is recommended that ADA Compliance be removed from the FY24 audit plan in order to avoid duplication of effort.

OFFICE OF INTERNAL AUDIT

Summary of Internal Audit Reports Issued

Transfer Student Admissions

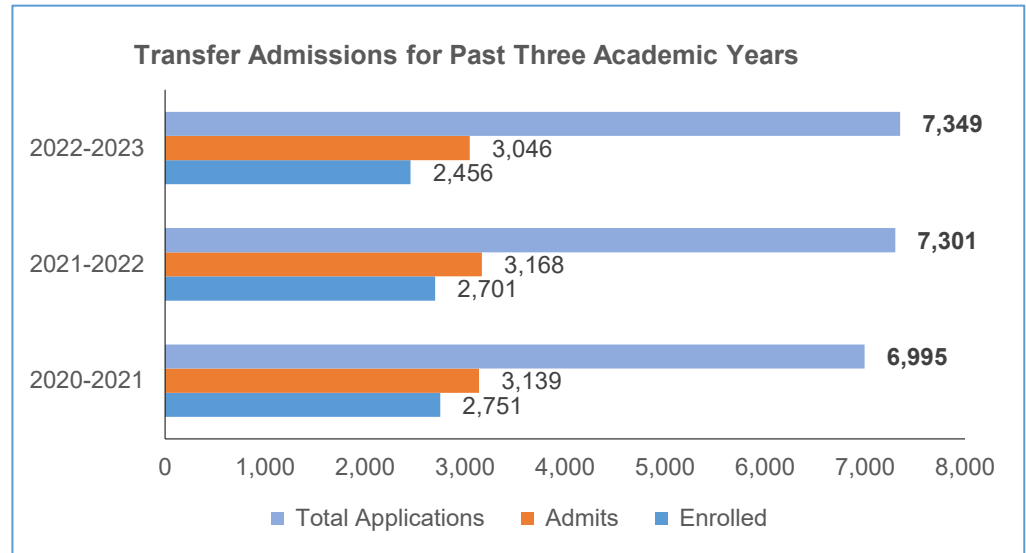
Transfer admission is one of the paths for students to enter the University of Florida’s (UF) undergraduate degree program. The Office of Admissions within the Division of Enrollment Management performs an initial review of applications and provide support to the colleges/departments regarding transfer admissions matters. Colleges/ departments review applications for their own degree programs’ requirements and make the final admissions decisions.

Objectives and Scope

- Understand the key business processes, roles and responsibilities of those involved in the transfer admissions program.
- Assess and evaluate the key business processes and internal controls for operational effectiveness and compliance,

Transfer Applications

The table on the right provides transfer applications received for the past three academic years.



While the number of transfer applications has increased, the number of transfer admissions has decreased.

OFFICE OF INTERNAL AUDIT

Summary of Internal Audit Reports Issued

Transfer Student Admissions (Cont'd)

Summary Results and Conclusion

Overall, we noted that the University is diligent in ensuring that transfer student applications are assessed and comply with University admissions requirements. However, we have identified system and process level improvement opportunities which may promote efficiency, reduce faculty time in reviewing transfer student applications and enhance the application decision timeline. Key recommendations include:

- Developing a transfer admissions decision process roles and responsibilities document for the Admissions and the Colleges/Departments, including centralizing some roles and processes;
- Implementing a data analytics plan to assist in executing transfer student admissions strategies;
- Creating a forum to facilitate collaboration between key transfer student admissions at the central and college level;
- Formalizing the process for reviewing, approving, documenting and publicly disclosing articulation agreements; and
- Using the Slate system to improve documentation standards and exploring opportunities for automating certain tasks that are manual and time consuming.

OFFICE OF INTERNAL AUDIT

Appendix A – Fiscal Year 2023/24 Internal Audit Plan Status

	Audit Area	High Level Scope	Status
UNIVERSITY OF FLORIDA OPERATIONS			
1	Admissions	Assessment of internal controls and key business processes for admissions. Audit will be performed in collaboration with Enrollment Management and will cover people, process and technology.	Completed and Reported – Current Period
2	International Center	Departmental level assessment of key financial and operational controls, including compliance with policies, procedures and integrity of management information.	Final Report Stage
3	Student Fees	Assess internal controls and key business processes for compliance with Florida Statutes and University Regulations regarding allocation and spend of various categories of student fees collected.	Final Report Stage
4	Cyber Security Incident Response Management	In conjunction with UFIT, assess incident response management procedures using real test scenarios such as ransomware readiness, system breaches, etc.	In Progress
5	Gator 1 Card IT General Controls	Assess the IT general controls for the updated system to manage Gator 1 card. The updated system was implemented in early 2023.	In Progress
6	External Reporting & Data Integrity	Assess internal controls and integrity of reporting data for management decision and to external agencies.	Planning Stage
7	Institute of Food and Agricultural Sciences (IFAS) – Extension Offices	Assessment of financial and operational internal controls and key business processes covering fiscal management, governance, and compliance with policies and procedures.	Planning Stage
8	Physician Practice Plan – FCPA	Assess internal controls and key business processes for significant components of the practice plan. Scope will be determined based on review of risks and input from UF Health/COM and will include governance standards compliance. Joint project with UF Health Internal Audit.	Planning Stage

OFFICE OF INTERNAL AUDIT

Appendix A – Fiscal Year 2023/24 Internal Audit Plan Status (cont'd)

	Audit Area	High Level Scope	Status
UNIVERSITY OF FLORIDA OPERATIONS (Cont'd)			
9	College of Medicine	Assessment of financial and operational internal controls and key business processes covering fiscal management and compliance with policies and procedures. Focus areas will include financial, HR, admissions, accuracy of management reporting and oversight controls. To be completed in conjunction with audit of clinical practice plans.	Planning Stage
10	Post-Tenure Faculty Review	Review the University's post-tenure review process and report to the Board of Trustees as required by the Board of Governors Regulation 10.003(6)(a)(1). An audit of the tenure process for the prior fiscal year is required once every three years beginning on January 1, 2024. The report is required by July 1.	Planning Stage
11	Major Construction – Incurred Costs	Review of incurred costs of work performed by General Contractor for compliance with contract. Review will include internal controls and compliance with funding requirements, as appropriate. Leverage results from audit of major construction internal controls and key business processes.	Completed and Previously Reported
12	Major Construction Projects – Follow-Up	Follow-up of the implementation of the recommendations from the April 2023 Major Construction Project audit. Follow-up will assess effectiveness of controls for major construction as per agreed Management Action Plan and leading practices.	Completed and Previously Reported
13	Driver and Vehicle Information database (DAVID) System	Assessment of system level IT controls to assist management in meeting attestation requirements.	Completed and Previously Reported

OFFICE OF INTERNAL AUDIT

Appendix A – Fiscal Year 2023/24 Internal Audit Plan Status (cont'd)

	Audit Area	High Level Scope	Status
UNIVERSITY OF FLORIDA OPERATIONS (Cont'd)			
14	Identity and Access Management (IAM)	Assessment of access controls to enterprise-level system, including managing identity, role provisioning and deprovisioning.	Completed and Previously Reported
15	Research – Pre-Award	Assess business and quality review processes for research proposal processes at the central and unit level.	Completed and Previously Reported
16	Governance Standards	Assess procedures for managing compliance with BOG and BOT governance standards and regulations.	Completed and Previously Reported
17	Research Shield Computing Environment	Assessment of information security controls using leading practice frameworks (e.g., NIST, ISO 27001) as guidance.	Completed and Previously Reported
18	Performance-Based Funding and Preeminent Designation Status Funding	Provide assurance that the data submitted by the University complies with the data definitions established by the BOG.	Completed and Previously Reported
19	IT Security Risk Assessment	Assess information security controls using UFIT risk framework and NIST requirements, as appropriate, at selected decentralized locations to improve university cyber security maturity.	
20	Housing Operations	Assessment of key financial business processes and effectiveness of internal controls, including areas for efficiency and cost savings.	
21	Research Compliance – Post Award	Assessment of compliance with sponsored contracts and grants. Scope will be co-developed to focus on current research compliance risks.	
22	Data Governance	Assess data governance framework and business processes for compliance with University policies, practices, and legislative requirements to ensure that data is accessible, usable, and protected.	

OFFICE OF INTERNAL AUDIT

Appendix A – Fiscal Year 2023/24 Internal Audit Plan Status (cont'd)

	Audit Area	High Level Scope	Status
UNIVERSITY OF FLORIDA OPERATIONS (Cont'd)			
23	Unit Level Assessment <i>(Selected Center)</i>	Assessment of financial and operational internal controls and key business processes covering fiscal management and compliance with policies and procedures. Focus areas will include financial, HR, accuracy of management reporting and oversight controls.	
24	UF GO Travel System	Assessment of key business processes for UF Go travel management system. Scope will include assessing internal controls over procurement cards and IT general controls.	Proposal to defer to FY25
25	Service Fees and Indirect Charges Governance	Assess compliance with policy and governance around service fees and indirect charges levied by units and impact on budget model.	
26	Faculty Workload Management Process	Assess the University's business processes for managing faculty workload. Scope will include IT controls over system used and integrity of management information.	
27	UF Online	Assess IT general controls for the UF Online system.	
28	Americans with Disabilities Act (ADA) Compliance	In conjunction with Office of Compliance and Ethics, assess key business processes for compliance with ADA.	Proposal to remove this audit
UNIVERSITY OF FLORIDA FOUNDATION			
29	Gift Agreement Processing	Assessment of key business processes and internal controls for new awards, data integrity, accuracy of information and reconciliation with Financial Accounting System and gift agreement.	Completed and Previously Reported
30	UFF – Advancement System/One UFIT Initiative	Pre-implementation assessment of internal controls for key business processes.	In Progress

OFFICE OF INTERNAL AUDIT

Appendix A – Fiscal Year 2023/24 Internal Audit Plan Status (cont'd)

	Audit Area	High Level Scope	Status
UNIVERSITY OF FLORIDA FOUNDATION (Cont'd)			
31	Alumni Association	High-level assessment of governance, oversight and monitoring controls covering Alumni Association’s key activities.	
UNIVERSITY ATHLETIC ASSOCIATION			
32	Ticket Operations	Financial and operational assessment of internal controls for key business processes and evaluate IT general controls.	Completed and Previously Reported
33	Payroll	Assessment of internal control for key business processes.	
34	Scholarships	Assessment of internal controls over scholarship payments and monitoring compliance.	
35	Business Continuity and Disaster Recovery Planning	Assessment of UAA BCP/DRP procedures to address incident response and cyber security risks. Scope will include alignment with university-level initiatives and leveraging central-level controls.	
36	Name image and Likeness (NIL)	High-level assessment to document risks, opportunities and areas for monitoring based on current regulations and guidance.	
OTHER SIGNIFICANT ACTIVITIES			
	Follow-Up	Regular follow-up on the implementation of management action plans from internal audit and other assurance reports.	Ongoing progress reports are provided
	Investigations	Responding to and following up on incidents and whistleblower complaints received through the 'Hotline' and other sources.	Ongoing. Monthly summary reports are provided and discussed with the Audit and Compliance Committee Chair.