In accordance with Board of Governors Regulation 1.001(6)(g), each board of trustees shall direct its Chief Audit Executive to perform, or cause to have performed by an independent audit firm, an audit of the university’s processes which ensure the completeness, accuracy and timeliness of data submissions to the Board of Governors.

The results of this audit are to be provided to the Board of Governors after being accepted by the university board of trustees. The report shall be submitted to the Board of Governors by March 1, 2015.

The scope and objectives of the audit will be set jointly between the Chair of the university board of trustees and the university Chief Audit Executive, but at a minimum include the objectives outlined below. The audit shall be performed in accordance with the current International Standards for the Professional Practice of Internal Auditing as published by the Institute of Internal Auditors, Inc., and the minimum audit guidelines established in this document.

Based on the audit report, the university shall develop and submit, for Board of Governors approval, a corrective action plan designed to correct any audit findings. The corrective action plan shall be submitted to Chair of the Board of Governors Audit and Compliance Committee (with a copy to the Inspector General and Director of Compliance) no later than 30 days after the auditor’s report is accepted by the board of trustees for the university.

If the university board of trustees has certified to internal controls which are found to be deficient by the audit, then the board of trustees shall, in coordination with the university president, amend the affected representations and resubmit the certification to the Board of Governors.

Implementation of and compliance with the corrective action plan shall be reviewed as part of the university Chief Audit Executive’s annual audit work plan.
MINIMUM AUDIT GUIDELINES

The audit **scope** should, at a minimum, include a review of the university data submissions to the Board of Governors with an emphasis on data which supports performance funding metrics for the most recent submission fiscal year.

At a minimum, the **objectives** of the audit will be to review:

- The appointment of the Data Administrator by the university president and that duties related to these responsibilities are incorporated into the Data Administrator’s official position description.
- The processes used by the Data Administrator to ensure the completeness, accuracy and timely submission of data to the Board of Governors.
- Any available documentation including policies, procedures, desk manuals of appropriate staff and to assess their adequacy for ensuring data integrity for university data submissions to the Board of Governors.
- System access controls and user privileges to evaluate if they are properly assigned and periodically reviewed to ensure only those authorized to make data changes do so.
- Testing of data accuracy through tracing sampled items to source documents.
- The veracity of the university Data Administrator’s data submission statements that indicate, “I certify that this file/data represents the position of this University for the term being reported.”
- The consistency of data submissions with the data definitions and guidance provided by the Board of Governors through the Data Committee and communications from data workshops.
- The university Data Administrator’s data resubmissions to the Board of Governors with a view toward ensuring these resubmissions are both necessary and authorized. This review should also evaluate how to minimize the need for data resubmissions.