

INTERNAL AUDIT
FISCAL YEAR 2016
ANNUAL AUDIT PLAN



TEXAS DEPARTMENT OF INSURANCE
INTERNAL AUDIT DIVISION

SEPTEMBER 2015

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First printing, September 2015

Publication ID: IAAP | 0915

This document is available online at www.tdi.texas.gov/reports

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SEPTEMBER 2015

PLAN APPROVED



David C. Mattax
Commissioner of Insurance

9/30/15

Date



Ryan Branman
Commissioner of Workers' Compensation

9/30/15

Date



Greg Royal, CPA, CIA, CGAP, CRMA
Internal Audit Director

9/30/15

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OVERVIEW OF TDI INTERNAL AUDIT FISCAL YEAR 2016 ANNUAL AUDIT PLAN

INTRODUCTION

This document provides the Fiscal Year (FY) 2016 Audit Plan as required by professional auditing standards and the Texas Internal Auditing Act (Texas Government Code, Ch. §2102.008). This plan provides our vision of Internal Audit efforts for FY 2016, allocating resources to the most critical areas within the Texas Department of Insurance (TDI).

Projects were identified for the Audit Plan by using a risk assessment model that considered input from TDI management, commissioners, and the State Auditor's Office. Using that input, staff exercised auditor judgment to prioritize projects for FY 2016.

AUDIT CHARTER AND DEFINITION

The Audit Charter approved by the commissioners in October 2014 provides authorization to Internal Audit personnel for full, free, and unrestricted access to any of the agency's systems, records (manual or electronic), functions, property, and personnel relevant to the performance of statutory responsibilities and duties assigned by the Commissioner of Insurance and the Commissioner of Workers' Compensation. The charter also defines reporting relationships and the scope of audit work, as well as audit reporting and follow-up responsibilities.

As the internal audit profession has evolved, so has the definition of our work efforts.

Internal auditing is an independent, objective assurance and consulting activity designed to add value and improve an organization's operations. It helps an organization accomplish its objectives by bringing a systematic, disciplined approach to evaluate and improve the effectiveness of risk management, control, and governance processes.¹

RISK ASSESSMENT

Internal Audit developed the Audit Plan by first conducting a comprehensive risk assessment of agency program activities. We then selected projects for FY 2016 based on relative risk and available hours.

Risk assessment is a systematic process for assessing and integrating professional judgments about probable adverse conditions and/or events. This process provides a means to organize and integrate professional judgments for project selection and work schedule development. Activities with higher risk were assigned higher audit priorities. Internal Audit used the risk assessment results for recommending projects.

We assessed risk within TDI by sending out agency-wide questionnaires and interviewing selected executive management, as well as other management responsible for championing the agency Balanced Scorecard and Enterprise Risk Management (ERM) programs. Then, staff used the following criteria to determine the relative risk of each program activity and select projects:

- ★ Criticality to agency mission
- ★ Prior audits or studies
- ★ Size or complexity of operations
- ★ Quality of internal controls
- ★ Other high-risk indicators
- ★ Auditor judgment

The activities used in our analysis came from the following sources:

- ★ Activities identified from questionnaires and interviews
- ★ Prior division-level ERM footprints last obtained in 2013
- ★ Balanced Scorecard

¹ Institute of Internal Auditors – International Professional Practices Framework, July 2015

An information technology (IT) specific risk assessment was also performed. Internal Audit used similar criteria for the IT assessment to distinguish risk between application controls and general controls. The criteria used to rate applications included:

- ★ Current utilization
- ★ Criticality
- ★ Interfacing with other applications
- ★ Technological complexity
- ★ Number and types of users
- ★ Prior audits
- ★ Vendor support
- ★ Auditor judgment

The following criteria were used to rate IT general controls:

- ★ Control environment
- ★ Change management
- ★ Development life cycle
- ★ Logical access
- ★ Incident management
- ★ Technical support
- ★ Hardware and software
- ★ Disaster recovery and backup
- ★ Physical security

General controls are control procedures that exist in the IT environment as a whole, while application controls exist specifically for each application. Projects selected cover both general and application controls.

Audit hours are distributed across the 10 core functions identified in the agency's *Fiscal Year 2015-2019 Strategic Plan*. As shown in Figure 1, we allocated 9,408 hours to audit and consulting projects, which includes 6,760 hours for new projects, 2,648 hours for carry-over projects, 250 hours for special requests, and 200 hours for miscellaneous advisory projects for FY 2016. All IT, legal, and administrative operations projects are included in Support Services.

Figure 1: FY 2016 Core TDI Function Coverage Hours



Figure 2 below compares Internal Audit’s actual coverage for FY 2013, FY 2014, FY 2015, and budgeted coverage for FY 2016. The latest Strategic Plan added Workers’ Compensation as a separate category for the first time.

Figure 2: Historical Core TDI Function Coverage Hours

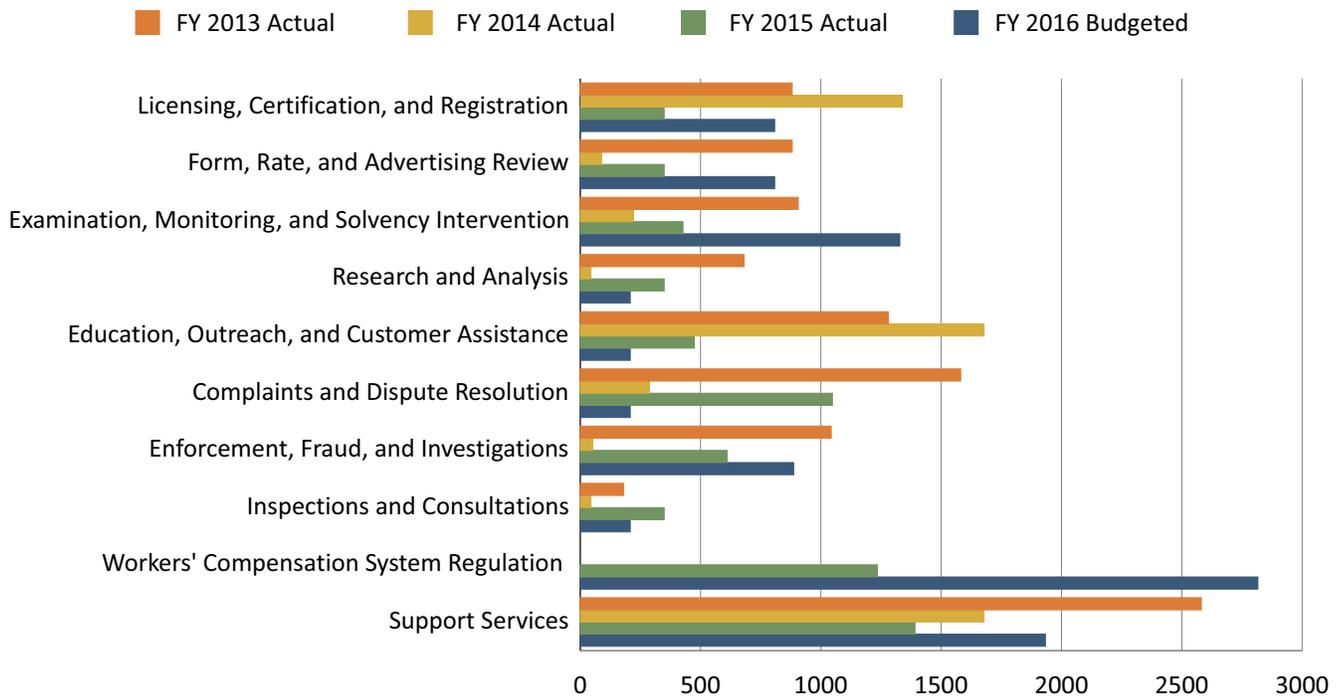
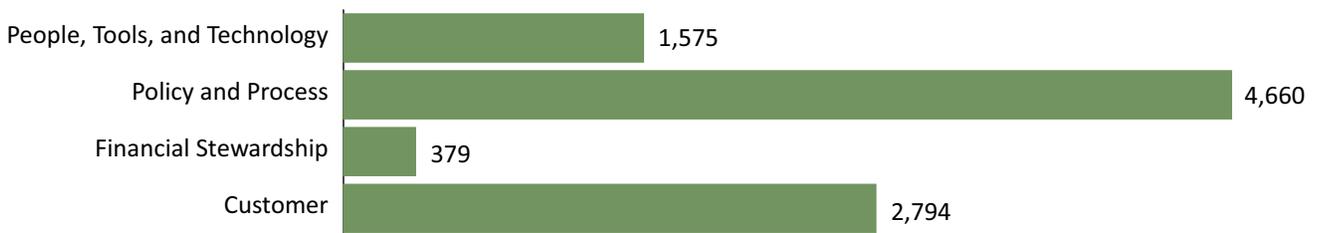


Figure 3 below shows the coverage of each of the four Balanced Scorecard Agency Perspectives.

Figure 3: TDI Balanced Scorecard Perspectives Coverage Hours



ACCEPTABLE LEVEL OF RISK

Although the plan contemplates a wide-ranging scope of audit effort, it does not provide coverage for all TDI components or systems. We attempted to maximize limited Internal Audit resources to provide reasonable coverage of the business activities we believe require the most attention.

However, because we cannot address every risk area, it is important the commissioners and management understand the limitations of the audit coverage and the risks they assume in unaudited areas. This plan allocates Internal Audit resources to the agency's most important priorities and risks at this point in time. The Audit Plan also includes 250 hours for special audit requests from the commissioners or executive management that may occur during the year.

The Internal Audit Division is committed to being a valuable resource in improving the agency's operations and proposes a plan that targets key processes, yet builds flexibility to allow for commissioner and management special requests that require immediate attention. After accounting for scheduled holidays, vacation, sick leave, required training and administrative projects, 9,408 hours are available for audits, consulting activities, investigations, and special requests.

FY 2016 INTERNAL AUDIT PLAN ALLOCATION

The Audit Plan depicts hours allocated to audit engagements in various divisions and sections of the agency and is shown in Schedule 1. The Audit Plan includes the following sections:

Projects Carried Forward

Some projects that began in FY 2015 were not completed by the end of the fiscal year. The following FY 2015 projects were started in FY 2015 and have hours allocated in FY 2016 to complete the project: Enforcement, Fraud Unit, Hearings, performance measures, Title, legal – open records, and risk assessment for FY 2016. Other projects that were not started in FY 2015, yet are still included in the FY 2016 Audit Plan include Gartner Project follow-up (combined two projects from FY 2015), ERM process assessment, controls survey, and TeamMate build-out of other modules. In addition, the division underwent an independent quality assurance review, which was completed with a report issued in September 2015.

Information Technology Services Projects

One of the projects and hours shown in this section combine two carry-over projects from prior audit plans. Two other IT-specific audits were selected through the IT-specific risk assessment and subsequent discussions with management. Although most audit projects have an IT component included in the audit scope, these projects will have a scope and objectives specific to IT controls in place.

Financial/Performance Assurance Activities

Internal Audit provides assurance services for TDI, which are defined as objective examinations of evidence for the purpose of providing an independent assessment on risk management, control, and governance processes for the agency. Examples may include financial, compliance, economy and efficiency, effectiveness, investigations, and information technology engagements.

Hours allocated in this section are dedicated to projects that were selected through the agency-wide risk assessment.

Special Initiatives

In addition to assurance and consulting engagements, Internal Audit allocates resources toward special initiatives. These initiatives include any liaison activities, which may occur during the year and special requests to be responsive to the immediate needs of the commissioners and management.

Consulting/Advisory Activities

By definition, internal auditing includes the provision of consulting services. Consulting services are advisory and related client service activities, the nature and scope of which are agreed upon with the client. These activities are intended to add value and improve an organization's governance, risk management, and control processes without the internal auditor assuming management responsibility. Examples include counsel, advice, facilitation, and training.

Progressive Internal Audit departments provide additional management assistance or consulting services to their organizations. We will continue to provide representation on TDI committees and work groups as needed and requested by the Commissioner of Insurance, the Commissioner of Workers' Compensation, and management. Upon request, we will provide both formal and informal advice and suggestions on management issues, concerns, and draft policies and procedures.

By providing consulting or advisory activities, Internal Audit adds value to TDI beyond assurance services and assists in strengthening agency internal controls.

Administrative Activities

We included hours for various administrative activities of the Internal Audit Division, some of which are mandated either by the professional standards or statute we are required to follow. Department leave time is also included to show a full picture of hours to be used by Internal Audit during the year.

Professional Standards

We adhere to *Government Auditing Standards*, as promulgated by the U.S. Government Accountability Office and the *International Standards for the Professional Practice of Internal Auditing*, as promulgated by the Institute of Internal Auditors, which includes the Code of Ethics. In addition, we conform to requirements found under the Texas Internal Auditing Act (Texas Government Code §2102) and comply with all policies and procedures of TDI.

PERFORMANCE MEASURES

Internal Audit performance measures for FY 2016 are as follows:

- ★ Complete development and approval of the Fiscal Year 2015 Audit Plan by September 30, 2015.
- ★ Complete the FY 2015 Annual Internal Audit Report by November 1, 2015.
- ★ Complete 80 percent of the scheduled FY 2016 Audit Plan projects.
- ★ Spend a minimum of 75 percent of total planned hours available on direct audit and consulting work.
- ★ Obtain management acceptance of 95 percent of audit issues and/or recommendations.
- ★ Obtain management satisfaction on at least 80 percent of audit assurance and consulting activities.

Internal Performance Measure results for FY 2015 were:

- ★ FY 2015 Audit Plan was approved in October 2014.
- ★ FY 2014 Annual Internal Audit Report was completed in October 2014.
- ★ Seventeen of the 29 projects in the 2015 Audit Plan were completed by the end of FY 2015 (59 percent). There were also two investigations completed that were not in the 2015 Audit Plan and three consulting projects requested by management completed during the year. There were seven on-going projects carried over into the FY 2016 Audit Plan.
- ★ Internal Audit spent less than 60 percent of total hours available on direct audit or consulting work in FY 2015, as we experienced significant turnover of senior level staff. Due to training new staff, approximately 40 percent of recorded time was spent on administrative or staff development activities.
- ★ Management acceptance of audit issues and/or recommendations exceeded 95 percent.
- ★ Management satisfaction from returned surveys exceeded 80 percent of audit assurance and consulting activities.

AUDIT ORGANIZATION STAFFING AND BUDGET

A current organization chart for Internal Audit is attached to this plan and shown in Schedule 2. The division includes nine full-time equivalent positions: an audit director, seven auditors, and an executive assistant; we currently have a vacancy for a senior auditor. The FY 2016 Internal Audit Plan was developed based on the assumption that the division would be fully staffed throughout the year, with the exception of one auditor starting in November. The division lost a senior auditor in August, just prior to the end of FY 2015. The FY 2016 budget is included in this plan and is shown in Schedule 3.

Current Internal Audit staff members collectively have over 58 years auditing experience, including over 23 years at TDI. In addition, audit staff possess the following 16 professional certifications:

- ★ Four Certified Internal Auditors (CIA)
- ★ Three Certified Government Auditing Professionals (CGAP)
- ★ Two Certified Public Accountants (CPA)
- ★ Two Certifications in Risk Management Assurance (CRMA)
- ★ One Certified Fraud Examiner (CFE)
- ★ One Certified Information Systems Auditor (CISA)
- ★ One Certification in Control Self-Assessment (CCSA)
- ★ One Certified Investments and Derivatives Auditor (CIDA)
- ★ One Certified Internal Controls Auditor (CICA)

CLOSING

Audit plans act as a guide for audit departments. Our plan includes proposed projects and other initiatives to perform during the year. We have budgeted time for special requests so that we can be responsive to the immediate needs of the commissioners and management as they may arise throughout the fiscal year.

As discussed previously under “Acceptable Level of Risk” our plan does not, nor is it intended to, address or provide complete coverage for all TDI components or system risks. We believe that this plan allocates the resources of the Internal Audit Division to the most important priorities and risks of the agency at this point in time.

Internal Audit wishes to thank TDI management and staff for their assistance in providing information which led to the development of this proposal. In addition, the Internal Audit Division looks forward to helping the agency meet its objectives this fiscal year. For further information on the FY 2016 Internal Audit Plan, please contact the Internal Audit Director, Greg Royal, at (512) 676-6200 or by email at greg.royal@tdi.texas.gov.

SCHEDULE 1 – FY 2016 INTERNAL AUDIT PLAN PROJECTS*

Project #	Project Description	Area	FY 2016 Hours
Projects Started and Carried Forward From FY 2015			
2015-305	Enforcement	DWC	490
2015-306	Title	FIN	420
2015-307	Fraud Unit	FRAUD	424
2015-308	Hearings	DWC	588
2015-407	FY 2016 risk assessment	Agency-Wide	230
2015-611	Performance measures (consulting)	Agency-Wide	246
2015-612	Legal – open records (consulting)	Gen. Counsel	250
Subtotal Carry-Forward Projects			2,648
Information Technology Services Projects			
Pending	Gartner Report follow-up (security assessment and ITS governance; projects in prior audit plans)	ITS	325
Pending	Asset management	AO	600
Pending	User-developed applications (consulting)	ITS	300
Subtotal Information Technology Audits			1,225
Financial/Performance Assurance Activities			
Pending	Rehabilitation and Liquidation Oversight Program	FIN	700
Pending	Agent and Adjuster Licensing Office	FIN	600
Pending	Regulatory Policy	Reg Policy	600
Pending	Designated doctor exam scheduling	DWC	400
Pending	Appeals panel	DWC	400
Pending	Workplace safety	DWC	500
Pending	Business continuity	AO	500
Pending	ERM process assessment (FY 2015 Audit Plan project)	Agency-Wide	400
Pending	Mid-year recommendations follow-up (Internal Audit reports)	Agency-Wide	50
2016-301	Seized/forfeited property audit - FY 2014 (Code of Criminal Procedures Art 59.06)	Fraud/SFMO	10
Subtotal Financial/Performance Audits			4,160
Special Initiatives			
Various	Hours reserved for special assigned audits, investigations, or management requests	N/A	250
Special Initiatives Subtotal			250
Consulting/Advisory Activities			
Pending	DWC succession planning	DWC	400
Pending	Controls survey (FY 2015 Audit Plan project)	Agency-Wide	250
2016-601	ITS customer meetings	Agency-Wide	150
Pending	Investigations – Complaints Audit follow-up	DWC	75
Pending	Confidential information	Agency-Wide	50
Pending	Miscellaneous advisory projects	Agency-Wide	200
Subtotal Advisory/Liaison Projects			1,125
Subtotal - Audits, Investigations and Advisory Projects			9,408

Administrative and Required Internal Audit Activities			
2016-400	General administration†	N/A	2,243
2016-000	Leave‡	N/A	1,775
Pending	FY 2017 risk assessment	N/A	400
2016-401	Staff training	N/A	320
Pending	TeamMate build-out of other modules	N/A	200
Pending	External peer review – part of State Agency Internal Audit Forum Team	N/A	150
2016-403	FY 2015 Internal Audit Annual Report	N/A	100
Subtotal - Administrative & Other Internal Audit Projects			5,188
Total Available Hours^			14,596

* Acronyms: AO-Administrative Operations Division; DWC-Division of Workers' Compensation; FIN-Financial Regulation; ITS-Information Technology Services; SFMO-State Fire Marshal's Office

† Administration/Special Projects of the Internal Audit function (auditor staff at 17.5 percent)

‡ Based on maximum annual vacation and sick accrual for each employee

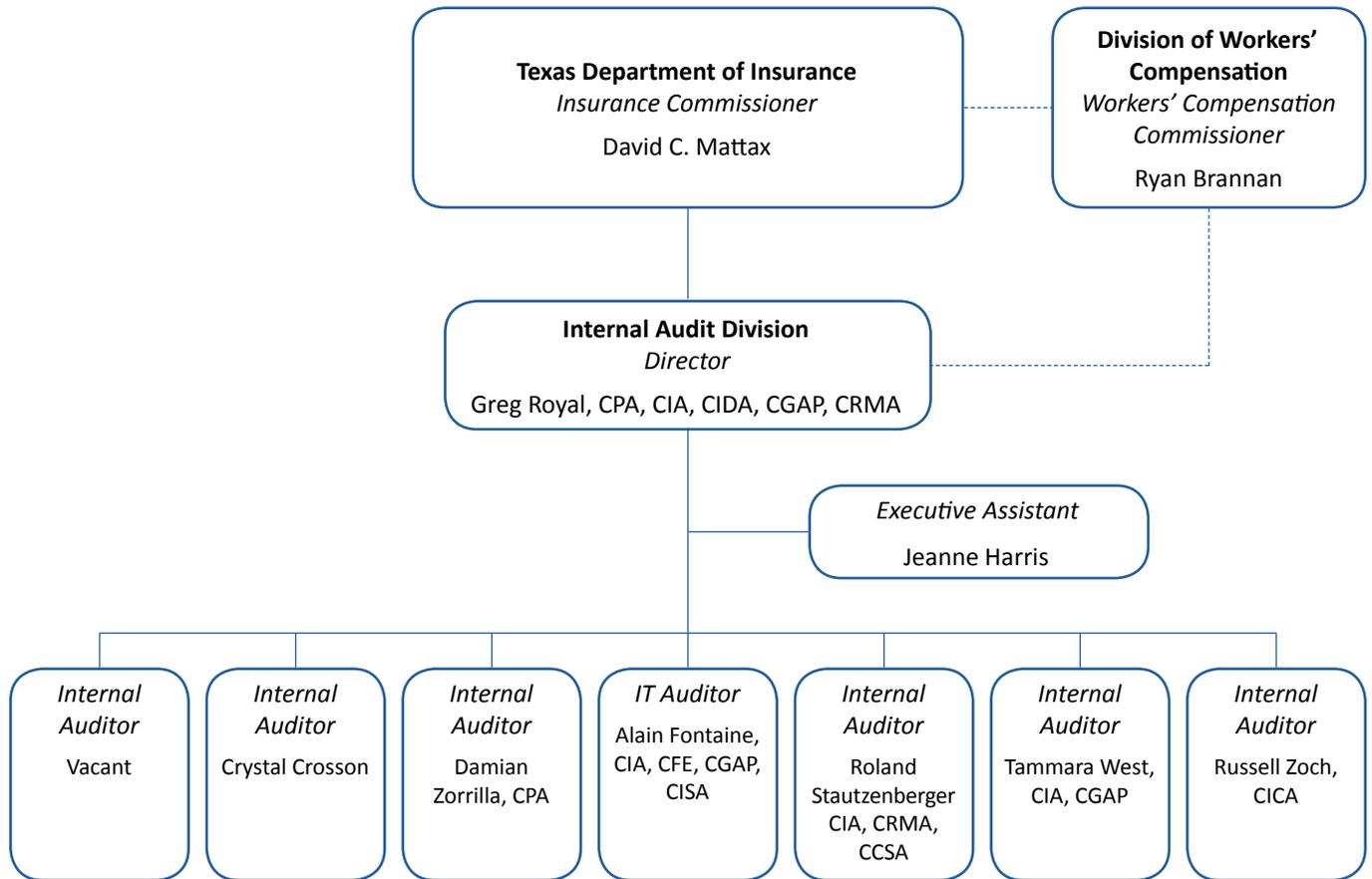
^ Available Hours:

(262 work days) - (13 holidays @ 8 hours/day) = 1,992 hours/year

(1,992 hours x 6 auditors, 1 auditor start Nov = 1,648 hours, + 1,992 x .5 audit director hours to projects) = 14,596 Total Hours

SCHEDULE 2 – INTERNAL AUDIT ORGANIZATION CHART

As of September 2015



SCHEDULE 3 – FY 2016 ANNUAL OPERATING BUDGET

Expenditure Category	FY 2016
Salaries and Longevity (9.0 FTEs)	\$ 631,239.40
Other Operating Expenses	10,016.00
Total Operating Budget	\$ 641,255.40



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