

Board of Visitors

Audit, Compliance, and Risk Committee

June 1, 2023

June 2023

Audit, Compliance, and Risk Committee Meeting Agenda

- Remarks by Tom DePasquale, Committee Chair
- Internal Audit Plan Review and Approval
- Auditor of Public Accounts Entrance Meeting
- Written Reports

Carolyn Devine
Saint
Chief Audit
Executive

Audit Plan Review and Approval (FY2023-2024 and FY2024-2025)

Preparing the 2-year, risk-based internal audit plan is an iterative process



The proposed audit plan balances risk coverage with available resources and institutional priorities



UVA Health Audit Plan

FY2024-FY2025

UVA Health Enterprise Risk Universe



Health Care Regulatory Compliance

Quality and Patient Safety Strategy, Network Development and Growth

Research / Education

UVA Health Enterprise Risk Universe System Integration and Optimization

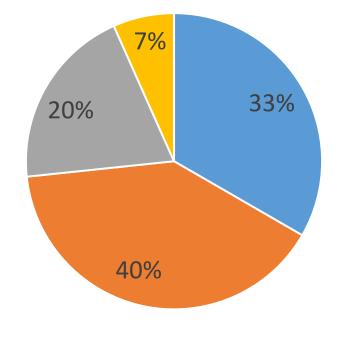
Reimbursement Reform Financial Sustainability

Workforce
Management and
Development

IT Security and Governance

Faculty
Compensation and
Productivity

FY24 AUDIT TOPICS BY RISK AREA: UVA HEALTH



N=15

- Financial Sustainability
- Health Care Regulatory Compliance
- IT Security and Governance
- Workforce Management and Development

Risk Area	Audit Topic	Scope
Health Care Regulatory Compliance	Contract Management (Deferred from FY2023)	Evaluate internal controls over contract development, approval and management.
	IRS 501(r) Compliance - UVACH (Deferred from FY2023)	Test compliance with IRS 501(r) rules applicable to non-profit hospitals, such as community needs analyses and plans, financial assistance program elements and publication.
	Physician Transactions - UVACH (Deferred from FY2023)	Test physician payments for compliance with contract payment terms and UVACH policies, such as contract review/approvals. Perform under the attorney client privilege.
	Medical Device Recalls / Credits	Evaluate policies and procedures for proper claims adjustments for medical device recalls.

Risk Area	Audit Topic	Scope
	Exclusion Screening for Vendors	Policies and procedures designed to ensure all onsite vendor representatives receive the required screening for potential exclusion from government payer programs.
Health Care Regulatory Compliance	Trauma Activation Claims – Billing Compliance	Validate that Medicare claims for trauma services comply with Medicare billing guidelines.

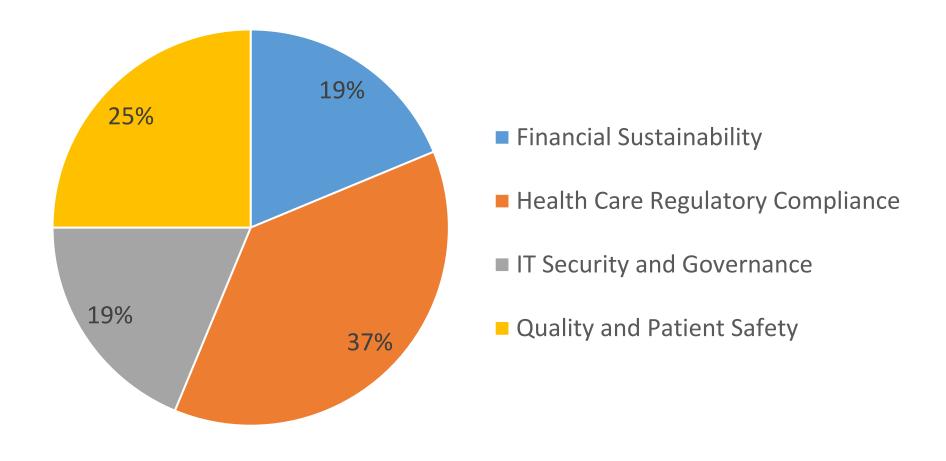
Risk Area	Audit Topic	Scope
Financial Sustainability	Late Charges – Professional Fee Billing	Level of compliance with Revenue Cycle standards for timely charge entry to patient accounts.
	Laboratory Outreach Billing (Non-patient receivables)	Billing and collection processes for the laboratory's outreach program (services provided to other organizations).
	Pharmacy 340B Program – UVA Community Health	Compliance to Pharmacy 340B regulatory requirements and assess practices for maximizing realized savings.
	Capital Asset Inventory Management – APA Audit Follow- up	Status of corrective action plans implemented in response to the internal control finding on capital asset inventory controls.

Risk Area	Audit Topic	Scope
Financial Sustainability	Warehouse Receiving Controls	The receiving processes at the new distribution warehouse – internal control design and effectiveness.

FY24 AUDIT PLAN TOPICS UVA HEALTH		
Risk Area	Audit Topic	Scope
Workforce Management and Development	Incentive Compensation Plans – University Hospital	Internal controls around the University Hospital's incentive compensation plans.

Risk Area	Audit Topic	Scope
IT Security and Governance	Ransomware Assessment Follow Up (IT Audit)	Determine if the recommendations outlined in the March 2022 Mandiant Purple Team Report have been addressed and closed by Management.
	Third Party Risk Management (IT Audit)	Identify and assess the controls supporting the third-party risk management program including governance & operating model, policies and procedures, third party data management, risk models, assessment methodology, and tools and technology used to support reporting.
	Identity & Access Management (IT Audit)	Identify the methods, processes, and controls by which access is provisioned and deprovisioned both centrally and for selected applications that authorize access to end users.

FY25 AUDIT TOPICS BY RISK AREA: UVA HEALTH



Risk Area	Audit Topic	Scope
Health Care Regulatory Compliance	Clinical Trials Billing Compliance	Policies, procedures and internal controls for compliant billing of clinical research.
	Provider Based Clinic Billing Compliance – UVACH	Compliance with Medicare billing rules for provider-based clinics.
	Balance Billing (No Surprises Act)	Compliance with regulatory requirement around billing specific services provided to patients with out-of-network coverage.
	Price Transparency	Compliance with the regulatory requirement to publish standard fees and provide estimates to patients.

Risk Area	Audit Topic	Scope
Health Care Begulatory Compliance	Information Blocking Rule	Compliance around the HHS rule prohibiting any practice likely to interfere with, prevent, or discourage access, exchange, or use of electronic health information (EHI).
Health Care Regulatory Compliance	Hospice Program	Management controls for the Hospice Program, including third-party management and processes to ensure compliance with the unique regulatory requirements for hospice programs.

Risk Area	Audit Topic	Scope
Financial Sustainability	Financial Assistance / Financial Counseling	Processes for helping patients without insurance find resources to help them pay medical costs.
	Insurance Verification / Validation	Procedures and controls for gathering and validating patient insurance coverage prior to providing services.
	Ambulatory Scheduling – Follow- up	Follow-up to FY2021 audit focused on procedures for monitoring and improving patient access performance in ambulatory clinics.

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Risk Area	Audit Topic	Scope
Quality and Patient Safety	Provider Credentialing	Compliance with provider credentialing policies and procedures.
	Opioid Stewardship Program	Assess maturity of the Opioid Stewardship Program at the University Hospital.
	Practitioner Peer Review	Assess whether peer review process conforms to UVA Health policy and procedures.
	Event Reporting (Be Safe Program)	Processes and controls in place for event reporting, analysis and response (adverse events, near misses and unsafe conditions).

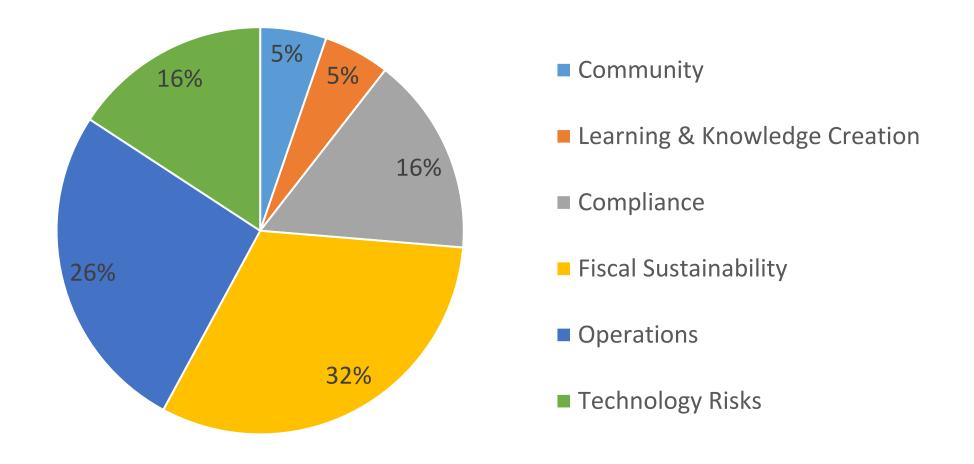
Risk Area	Audit Topic	Scope
Technology Risks	Threat and Vulnerability Management (IT Audit)	Identify and assess the controls supporting the threat and vulnerability management processes used for identifying, classifying, prioritizing, remediating, and mitigating software and firmware vulnerabilities.
	HIPAA Security Compliance (IT Audit)	Evaluate if adequate security procedures are in place at the Health Systems to protect the privacy of individually identifiable health information, called protected health information
	Incident Response (IT Audit)	Identify and assess the formal incident response capabilities including incident response policies, procedures, and playbooks, incident response governance, ownership and oversight, incident review metrics and reporting, prevention and detection mechanisms, and training and awareness.

UVA Academic Division Audit Plan

FY2024-FY2025



FY24 AUDIT TOPICS BY PRIMARY ERM RISK AREA: UVA ACADEMIC DIVISION



Primary ERM Risk Area	Audit Topic	Scope
Community	ESG - Sustainability Reporting (In Progress from FY23 plan)	Assess controls ensuring relevant, quality information is captured through the reporting process, culminating in the preparation of reliable sustainability reports.
Learning & Knowledge Creation	UVA Wise Academic Records - Degree Related Data (Jenzabar)	Evaluate design and effectiveness of controls over the maintenance of degree-related data, including grade submissions and changes, course substitutions and/or degree requirement exceptions, and incoming transcripts.
Compliance	NCAA Compliance: Financial Aid for Student-Athletes	Assess UVA Athletic Department Compliance Office's oversight of student-athletes Financial Aid considering anticipated impacts of the NCAA Name, Image, and Likeness (NIL) policy.
	CARES Compliance - Higher Education Emergency Relief Fund (HEERF I, II, III) - Part 3 (FY24)	Evaluate design and effectiveness of controls and processes related to HEERF funds data collection, use, accounting, and reporting.

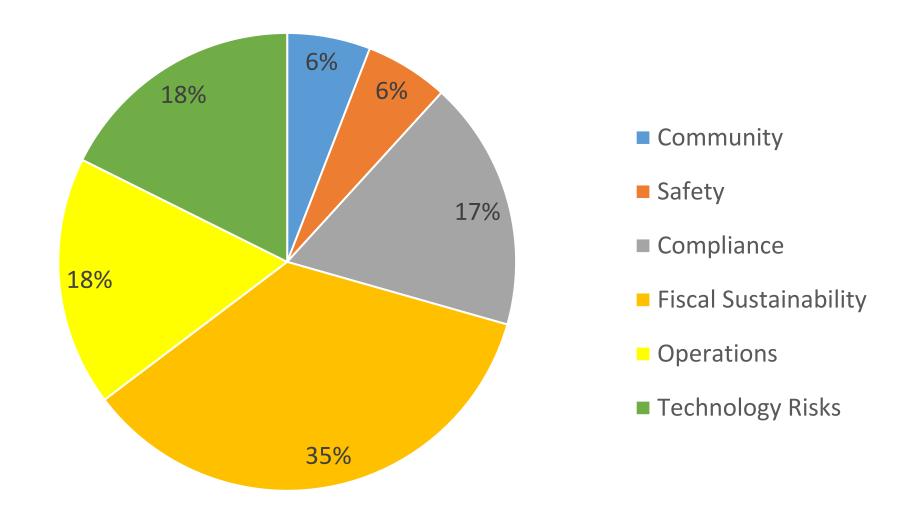
Primary ERM Risk Area	Audit Topic	Scope
Compliance	Presidential Travel and Expense	Annual audit of the President's Travel and Entertainment expenses. Audits were paused during pandemic-impacted years. Audit will cover FY23 expenses.
Operations	Benefits Administration	Follow-up on KPMG recommendations for the UVA Health Plan.
Fiscal Sustainability	Workday Financials Controls Validation: Grants and Contracts	Assess the effectiveness of key financial business process controls related to expenditures of sponsored funding.
	Workday Financials Controls Validation: Gifts	Assess the effectiveness of key financial business process controls related to the acceptance, receipt, recording, and processing of gifts to the University.

Primary ERM Risk Area	Audit Topic	Scope
Fiscal Sustainability	Student Financial Services	Evaluate design and effectiveness of controls over accuracy and timeliness of student billing and accounts receivable.
	Payroll	Evaluate controls over payroll processes including Workday user access, identification of employees working out-of-state/country, and untimely terminations resulting in overpayments.
Operations	School-Level Audits: Pilot Audit of McIntire School (In Progress from FY23 plan)	Complete pilot of school level audit program as a prelude to annual school level audits.
	School-Level Audits (3)	Assess effectiveness of risk-relevant school level controls and processes at 3 UVA schools.

Primary ERM Risk Area	Audit Topic	Scope
	Football Operations Building Construction Audit	Audit initiated in FY23 continues through the construction life cycle.
Fiscal Sustainability	Hotel and Conference Center Construction Audit	Audit initiated in FY23 continues through the construction life cycle.
Technology Risks	Ransomware Assessment Follow Up (IT Audit)	Determine if the recommendations outlined within the December 2021 Mandiant Purple Team Report for the Academic Division have been addressed and closed by Management.
	Third Party Risk Management (IT Audit)	Identify and assess the controls supporting the third-party risk management program such as: governance & operating model, policies, and procedures, third party data management, risk models, assessment methodology, and tools and technology used to support reporting.

Primary ERM Risk Area	Audit Topic	Scope
Technology Risks	IT Disaster Recovery (IT Audit)	Determine and evaluate if adequate processes are in place for recovering critical systems and data in the event a service disruption or breach occurs.

FY25 AUDIT TOPICS BY PRIMARY ERM RISK AREA: UVA ACADEMIC DIVISION



Primary ERM Risk Area	Audit Topic	Scope
Community	ESG Reporting	Evaluate current ESG reporting, metrics, and data analytics distributed across the University.
Safety	Child Development Center	Identify and assess oversight controls for contracted child day care services that ensure regulatory compliance and promote safety and security.
Compliance	Animal Care & Use Program	Evaluate the effectiveness of controls that support regulatory compliance over animal care and use, and promote safety, appropriate care, and security for individuals, animals, and facilities.
	Presidential Travel and Expenses	Annual audit of the President's Travel and Entertainment expenses. Audits were paused during pandemic-impacted years. Audit will cover FY24 expenses.

Primary ERM Risk Area	Audit Topic	Scope
Compliance	Research - Post Award Administration (Pan-University)	Assess effectiveness of post-award controls for selected sponsored awards to ensure compliance with sponsor requirements, applicable regulations, and University policy. (Deferred from FY2023)
Fiscal Sustainability	UVA Wise Student Financial Services	Evaluate design and effectiveness of controls over accuracy and timeliness of student billing and accounts receivable.
Fiscal Sustainability	Workday Financials Controls (3 business cycles)	Assess the ongoing effectiveness of key financial business process controls and managerial reporting capabilities to support operational decisions.
Operations	School-Level Audits (3)	Assess effectiveness of risk-relevant school level controls and processes at 3 UVA schools.

Primary ERM Risk Area	Audit Topic	Scope
Fiscal Sustainability	Football Operations Construction Audit	Audit initiated in FY23 continues through the construction life cycle.
	Hotel and Conference Center Construction Audit	Audit initiated in FY23 continues through the construction life cycle.
Technology Risks	Incident Response (IT Audit)	Identify and assess the formal incident response capabilities including incident response policies, procedures, and playbooks, incident response governance, ownership and oversight, incident review metrics and reporting, prevention and detection mechanisms, and training and awareness.
	Identity & Access Management (IT Audit)	Identify the methods, processes, and controls by which access is provisioned and deprovisioned both centrally and for a particular application that authorizes access to end users.

Primary ERM Risk Area	Audit Topic	Scope
Technology Risks	Data Integrity (IT Audit)	Determine and assess the design and operating effectiveness of the controls in place for financially relevant systems (ERP, GL, payroll systems) to ensure the data associated with the financial transactions within the system are processed completely and accurately.

Resolution

Resolved, the Audit, Compliance, and Risk Committee approves the FY2024-FY2025 Audit Department plan and recommends its approval to the Board of Visitors. David Rasnic

Auditor of Public

Accounts

Fiscal Year 2023 Audit Entrance Meeting



UVA and UVAMC Fiscal Year 2023









2023 Audit Entrance Meeting

June 1, 2023

David Rasnic, Audit Director

Scott Booker, Audit Director

Auditor of Public Accounts

Our Team

David Rasnic

Scott Booker

Noah Johnson

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Director	Director	Supervisor	Manager	Senior	Manager	Auditor
• 15 years experience	• 9 years experience	• 11 years experience	• 13 years experience	• 5 years experience	8 years experience	• 2 years experience
• CPA, CISA	• CISA	 CPA, CISA, VCO, Master 	• CPA, CFE	• CPA	BS in Computer	 Assigned
• Specialty: Higher Education	• Specialty: Process Innovation	of Accountancy • Specialty: Acquisitions	 Specialty: Reporting and Standards 	• Specialty: Higher Education	Science and certified in info systems, CISA	exclusively to audit systems security
 Recent Projects: George Mason University, Norfolk State University 	 Recent Projects: Virginia State University, UVAMC 	and Contract Management Recent Projects: Norfolk State University, UVA	 Recent Projects: Old Dominion University 	 Recent Projects: George Mason University and UVA 	 Manages and reviews system security work 	

Reann

Chiappinelli

Justin Rhodes

Danese

Seabourne

Taylor Collins

Our Team

Austen Wade

Bill Clymer

Auditor	Associate	Associate	Associate	Senior	Director
• 4 years experience	• 2 years experience	• 2 years experience	• 1.5 years experience	• 6 years experience	20 years experienceBS in
 Specialty: Reporting and Standards 	 Specialty: Reporting and Standards 	 Specialty: Budget and Legislative Monitoring 	• Specialty: Compliance Assurance	Specialty: Data AnalysisFacilitates audit data	Accounting, CPA, CISA, and CITP • Manages and
 Recent Projects: JMU, Virginia Tech 	 Recent Projects: William and Mary, UVA 	 Recent Projects: Mary Washington, UVAMC 	 Recent Projects: Virginia State University, UVAMC 	retrievalsRecent Projects: VCU, Longwood	reviews all data retrieval work • Recent Projects: VMI, JMU

Michael Gallo Michael Walsh

April Cassada

Jared Gilbert

Engagement Overview

• Audit Period: July 1, 2022 – June 30, 2023

Audit Timing: May 2023 – November 2023

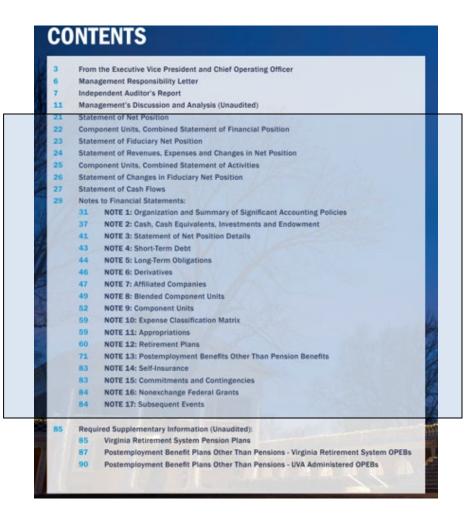
• Objectives: University-specific

Commonwealth Financial Statements

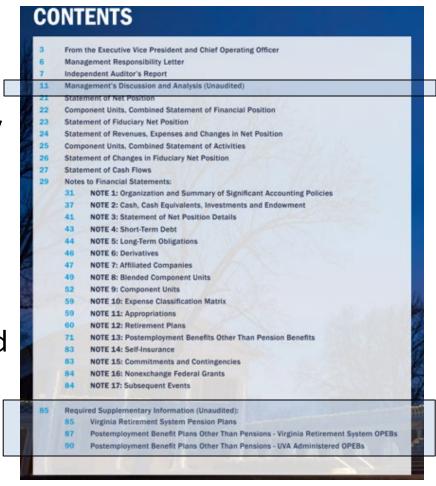
Federal

UVA and UVAMC Financial Statements

- Primary objective of audit is to provide an opinion on fair presentation in accordance with GAAP
- We assess risk of material misstatement at the line-item level and design an audit approach responsive to those risks
- Procedures include a combination of tests of detailed transactions and balances, as well as internal control processes

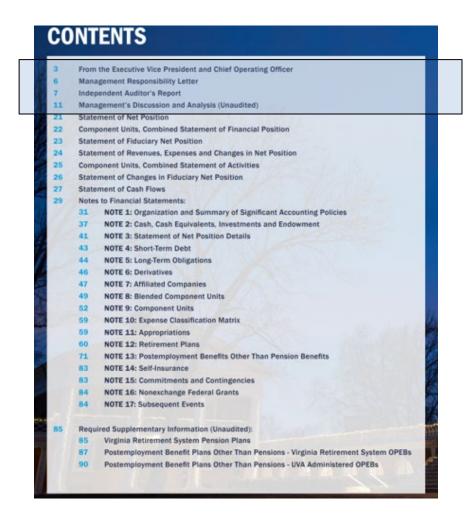


- Required Supplementary Information (RSI)
 - We review for consistency with the basic financial statements
 - We perform limited procedures, including management inquiries and review of support
 - We do not provide an opinion concerning RSI



Other Information

- We review for consistency with the basic financial statements
- We review for apparent material misstatements of fact based on knowledge of operations
- We do not provide an opinion or any assurance whatsoever concerning other information



Virginia ACFR

- Objective of audit is also to ensure fair presentation of attachments and supplemental items submitted to DOA
- Inquiries often require communication between UVA, DOA, and their respective audit teams
- Team also considers internal control processes relating to the compilation of this information

Report of the Comptroller to the Governor of Virginia

An Annual Comprehensive Financial Report For the Fiscal Year Ended June 30, 2022



Glenn Youngkin Governor

Stephen E. Cummings Secretary of Finance

> Lewis R. McCabe Comptroller

Virginia Single Audit

- The Statewide Single Audit (SSA) report serves as the internal control report for the Commonwealth's Annual Comprehensive Financial Report
- Findings included in the Consolidated internal controls report will be carried forward to the SSA report
- This report will include the results of our tests designed to evaluate the Research and Development and ESF federal programs



COMMONWEALTH OF VIRGINIA
SINGLE AUDIT REPORT

FOR THE YEAR ENDED JUNE 30, 2022

Auditor of Public Accounts Staci A. Henshaw, CPA www.apa.virginia.gov (804) 225-3350



Significant Risks

• Management Override of Controls

Revenue Recognition

- Financial Reporting
 - GASB 94 Public Private Partnerships
 - GASB 96 Subscription Based Information Technology Agreements

Approach to Materiality

- We consider what is likely to influence the judgment of a financial statement user in order to:
 - Assess risk and design audit procedures
 - Evaluate misstatements in amounts and deficiencies in processes
- Calculate quantitative thresholds by 'opinion unit'
 - Consolidated, Medical Center, Component Units
- Apply qualitative considerations in additional to quantitative

Assessing Fraud Risk

- Team interviews personnel and assesses the risk of fraud
- Team looks for red flags and considers the potential for fraud as it relates to exceptions identified during fieldwork
- UVA and UVAMC are required to notify APA when suspected fraud is identified



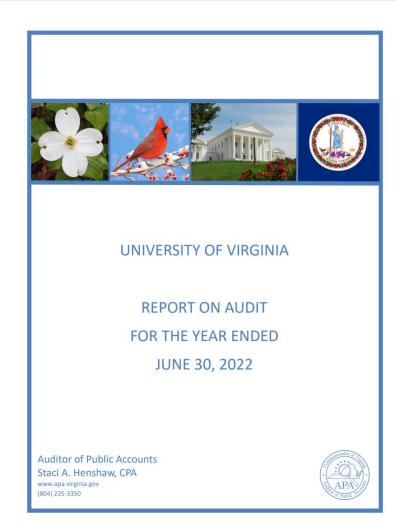
Assessing Risk of Noncompliance

- We consider the risk that potential non-compliance could have a material direct or indirect effect on the financial statements
- We assess management's processes
- We test compliance which we deem significant in the context of the audit objectives



Report on Internal Controls and Compliance

- We do not provide an opinion on internal controls
- We are required to report any findings that we deem to be significant deficiencies or material weaknesses
- Though not required, we plan to issue this report the same week we release the audit opinion



Management Communication

- Entrance/Exit with Management
- Biweekly status updates
- When potential concerns are noted:
 - Confirm condition
 - Obtain response
 - Evaluate significance

BOV Communication

- If you are aware of risks our audit should address, please share those with us
- Unless there are findings requiring your immediate attention, we will present our results to you at the conclusion of the audit
- If earlier communication is warranted, we will coordinate with management to ensure the Committee is informed in a timely manner

Terms of the engagement and representation letters

Intended Use Statement

This presentation is intended solely for the information and use of those charged with governance and management, and is not intended to be, and should not be, used by anyone other than these specified parties.

Sponsored Research Compliance Hot Topic: Data Management and Sharing



NIH has issued the <u>Data Management and Sharing (DMS) policy</u> (effective January 25, 2023) to promote the sharing of scientific data. Sharing scientific data accelerates biomedical research discovery, in part, by enabling validation of research results, providing accessibility to high-value datasets, and <u>promoting</u> data reuse for future research studies.



Under the DMS policy, NIH expects that investigators and institutions:

Plan and budget for the managing and sharing of data

Submit a DMS plan for review when applying for funding

Comply with the approved DMS

plan

Sponsored Research Hot Topic: NSPM-33 and CHIPS & Science Act Research Security Provisions



The standards cover overarching program requirements and certification, foreign travel security, research security training, cybersecurity, and export control training.



Public comment period on proposed standards are due by June 2023



2023 Audit Plan **Hot Spots**





Gartner 2023 Audit Plan Hot Spots Executive Summary

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Hot Spot	Summary	2023 Drivers	2022 Drivers
Cyberthreats	Heightened scrutiny on cyber breach disclosures alongside sophisticated state-sponsored attacks makes cyberthreats a growing risk in 2023, increasing organizations' exposure to reputational, litigation and regulatory risk.	 State-Sponsored Cyberattacks Cyber Breach Disclosure Requirements 	Lapses in Security Controls Increased Employee Vulnerability to Social Engineering
IT Governance	Higher use of ungoverned SaaS increases organizations' risk exposure, and an ongoing IT talent deficit further hinders enterprise agility and digital capability development. This issue leaves organizations exposed to enterprise growth and governance risks.	Ungoverned SaaS IT Talent Shortage	Rapid Adoption of New Technologies Access Management Challenges
Data Governance	Organizations increasingly employ AI with little formal oversight and the fragmented regulatory landscape highlights the need for organizations to improve governance over how they use and protect data assets.	 Al Governance Personal-Data-Related Regulatory Fragmentation 	Ineffective Data and Analytics Organizational Models Insufficient Data-Sharing Enablement and Controls
Third-Party Risk Management	A combination of new third-party ESG reporting requirements and increasing financial and operational constraints elevate the risk of reputational damage from third parties. Further, the current macroeconomic conditions that raise concerns about third parties' financial viability may result in operational disruptions, high costs of switching vendors, and product quality and reliability issues for the organization.	 Third-Party Reputational Risk Third-Party Viability 	Limited Third-Party Risk Monitoring Unsupervised Privileged Access

Gartner 2023 Audit Plan Hot Spots Executive

Summary



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Hot Spot	Summary	2023 Drivers	2022 Drivers
Organizational Resilience	Organizations' ability to withstand crises and disruptions is evermore critical, as they are increasingly being tested. Each crisis reveals more areas of organizational fragility.	Geopolitical Conflict Diminished Change Capacity	Climate Degradation Regulatory Interest in Operational Resilience
Environmental, Social and Governance (ESG)	Expanding and new ESG regulations and increased stakeholder scrutiny mean organizations must build meaningful ESG policies into their strategies to follow all current regulations and avoid accusations of greenwashing.	Expanded ESG Reporting Standards Increased Scrutiny of ESG Practices	Increasing Capital Tied to ESG Performance Increased Legal and Regulatory Action on ESG
Supply Chain	Increasing geopolitical conflict, resulting in localization measures and logistical challenges across supply chains, has contributed to rising prices and diminishing ability to access critical materials. Organizations face the risk of declines in revenues, profitability, operational effectiveness and the ability to compete.	Renationalization of Supply Chains Logistics Challenges Stemming From China's "Zero-COVID" Policy	Key Goods and Materials Shortages Logistics and Shipping Challenges
Macroeconomic Volatility	A global economic downturn and a sharp rise in interest rates across the world increase risks to organizational assets and cash flows, threatening long-term financial performance and exacerbating an already highly uncertain operating and risk environment.	Rising Interest Rates Currency Volatility	Heightened Inflation Uncertainty Variances in the Global Economic Recovery

Gartner 2023 Audit Plan Hot Spots Executive Summary

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Hot Spot	Summary	2023 Drivers	2022 Drivers
Workforce Management	A combination of competitive labor markets with an expected cooling of economic growth fosters further uncertainty for organizations with regards to workforce management. With organizations undecided on their talent needs (in the case of a recession and the future of remote or hybrid work not yet fully determined), those who commit too quickly or too far face talent and business losses that are not easily reversible.	 Uncertain Talent Needs Uncertain Long-Term Effects of Hybrid Working Models 	 Cultural Disconnects in a Hybrid Workforce COVID-19 Workplace Management Uncertainty
Cost Pressures	Organizations are struggling with persistent cost pressures driven by an unyielding inflationary environment and an increase in regulatory complexity that has heightened the pressure on organizations to reduce costs and revisit their growth strategies.	 Persistent Inflation Changes to Tax Regimes 	Not a 2022 hot spot
Culture	Organizations are increasingly expected to weigh in on social and political issues as societal divisions spill over into the workplace and create potential rifts in organizational culture. At the same time, employees are experiencing high levels of disconnectedness from their organizations and co-workers, increasing exposure to risks from attrition to misconduct.	 Employee Disconnectedness Increasing Social and Political Expectations 	Not a 2022 hot spot
Climate Degradation	As the long-term impacts of climate change begin to take hold, an increased recurrence of extreme weather events threaten business continuity and vulnerable critical infrastructure.	 Increased Recurrence and Effects of Extreme Weather Events Vulnerable Critical Infrastructure 	Not a 2022 hot spot



Crowe Survey 2023: 25 Top Management Risks for Healthcare in 2023