

Audit Notification Policy

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Policy Statement	Effective Date: September 28, 2011
Reason for Policy	Last Updated: September 28, 2011
Who Should Read this Policy	Responsible University Officer: President
Policy Text	Policy Owner: Director of Internal Audit and Tax Compliance
Procedures	Policy Contact: Dominic Daher (dldaher@usfca.edu)
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POLICY STATEMENT

This policy does not apply to audits conducted by the Office of Internal Audit and Tax Compliance. Occasionally, departments may be contacted in connection with an audit, investigation, program review, or compliance review (hereinafter collectively and individually referred to as an “audit”). In such cases, the department must notify the Director of Internal Audit and Tax Compliance within three (3) business days that an audit is contemplated or has been initiated. In addition, in order to protect confidential and other sensitive information under the University’s control, no information should be provided to the auditors before the Director of Internal Audit and Tax Compliance has been contacted about the audit and the nature of the request for information.

REASON FOR POLICY

This Policy sets forth the standards for departments to follow in responding to requests for information made by external auditors. The policy also provides the standards for the coordination of such audits by Internal Audit and Tax Compliance

WHO SHOULD READ THIS POLICY

Any employee who is contacted by an external party in connection with a proposed audit of the University or a department or division thereof; the President, Vice Presidents, Vice Provosts, and Deans, as well as supervisors and Approving Budget Managers who are responsible for responding to requests for information made by external auditors.

POLICY TEXT

The Director of Internal Audit and Tax Compliance coordinates all internal and external audit activities in order to:

- Ensure accurate and fair evaluations;
- Prevent the inappropriate disclosure of confidential information;
- Avoid duplicate audits and audit costs;
- Determine the reasonableness of the audit objectives;
- Provide University administration with an independent understanding of the audit objectives and results; and
- Evaluate corrective actions planned or taken as a result of the audit.

This policy also allows for an appropriate deployment of University level (rather than department or division level) resources to be utilized in responding to prospective audits and for the centralized tracking of such audits by Internal Audit and Tax Compliance.

PROCEDURES

Departmental Procedures

In the normal course of business departments generate and collect a significant amount of confidential and other sensitive information about current and former faculty, staff, and students, as well as information about University operations. Access to and disclosure of such information must be appropriate, necessary, and for a clearly defined business and legal purpose. All members of the University community are responsible for safeguarding such information, for preventing its inadvertent disclosure, and for protecting the privacy of individuals and the integrity and reputation of the University. To this end, departments must notify the Director of Internal Audit and Tax Compliance before any information is provided to an external auditor.

Internal Audit and Tax Compliance Review

The Director of Internal Audit and Tax Compliance will participate in an entrance conference with the auditors and department management, as needed, to review the objectives and scope of the audit prior to the start of any audit field work. After the entrance conference, the department should make every effort to provide the requested information within the time period specified by the auditor. Any questions concerning subsequent requests for information, or an extension of time to respond to such requests, should be referred to the Director of Internal Audit and Tax Compliance. The Director will also participate in an exit conference, as needed, to discuss the audit findings and recommendations, and to verify that the auditors have obtained sufficient and accurate information to warrant their findings.

When appropriate, the Director of Internal Audit and Tax Compliance will work with the Vice President for Business and Finance and the General Counsel in evaluating auditor requests for information.

RELATED INFORMATION

Type	Name
USF	USF Information Security Policy
U.S. Department of Education – Policy Guidance	Family Educational Rights and Privacy Act (FERPA)

DEFINITIONS

Term	Definition
Auditor	Includes auditors employed by Deloitte & Touche LLP, the University’s external audit firm; federal auditors (e.g., Internal Revenue Service, U.S. Department of Education, U.S. State Department, etc.); state auditors (e.g., State Board of Equalization, Franchise Tax Board, etc.); any and all other auditors employed by the University (except those operating out of the Internal Audit and Tax Compliance).

ADDITIONAL CONTACTS

Subject	Contact	Phone	Email/URL
Internal Audit and Tax Compliance	Dominic Daher	415.422.5124	dldaher@usfca.edu

FORMS

Form	Use	Location
(None)		

RESPONSIBILITIES

Department

- Contacts the Director of Internal Audit and Tax Compliance in response to inquiries from external auditors.
- Responds to information requests made by external auditors within the time period specified.

Internal Audit and Tax Compliance Review

- Reviews external audit work plan and data requests in accordance with this Policy.
- Coordinates submission of requested information and requests for extensions.
- Ensures corrective action plans are implemented in a timely manner.

President, Vice Presidents, and Vice Provosts

Ensures departments under their jurisdiction are in compliance with this Policy, including the implementation of corrective actions arising from the audit.

FREQUENTLY ASKED QUESTIONS

(None)

REVISION HISTORY

- 09/28/2011 - First Publication

APPENDICES

(None)