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# *Correspondence Memorandum*

**Date:** June 10, 2021

**To:** Audit Committee

**From:** Yikchau Sze, Director
Office of Internal Audit

**Subject:** FY2022 – FY2023 Internal Audit Plan

**ETF requests the Audit Committee approve the draft internal audit plan for fiscal year 2022 through fiscal year 2023.**

The draft internal audit plan was prepared in accordance with the Charter of the Office of Internal Audit and the Internal Audit Standards promulgated by the Institute of Internal Auditors. The Charter requires the Office of Internal Audit to submit a risk based biennial audit plan to the Audit Committee for its review and approval.

Staff will be available at the Audit Committee meeting to answer questions.

Attachment: The Draft Internal Audit Plan for FY2022 – FY2023

| Board | Mtg Date | Item # |
|---|---|---|
| AUD | 6.16.21 | 7 |

# *Internal Audit Plan - Draft*

*FY 2022 – FY 2023*

Office of Internal Audit

*May 21, 2021*

WISCONSIN DEPARTMENT OF EMPLOYEE TRUST FUNDS

| Board | Mtg Date | Item # |
|---|---|---|
| AUD | 6.16.21 | 7 |

# *EXECUTIVE SUMMARY*

The Office of Internal Audit (OIA) is submitting this audit plan (Plan) for biennial period FY2022 and FY2023, as required by the Internal Audit Charter and by the Institute of Internal Auditors (IIA) International Standards for the Professional Practice of Internal Auditing.

The Plan is a critical document that ensures internal audit resources are used efficiently and effectively to fulfill its mission of enhancing and protecting ETF value through risk-based and objective assurance, advice and insight.

This Plan includes 17+ projects that will be preformed by the OIA and 7 information technology (IT) projects that will be performed by a consulting firm specialized in IT auditing and consulting services. Third party administrator (TPA) audits during the planning cycle are also included to provide a full picture of audit coverage of ETF. (See Appendix C)

The Plan is a dynamic document that changes during the planning cycle in response to the changes in business risks, timing of ETF initiatives, and resource availability. Any significant deviation from the approved Plan will be communicated to the Audit Committee of the ETF Board through quarterly activity reports. An annual status update of the Plan will be provided to the Audit Committee prior to each fiscal year end.

# *Audit Plan*

# *A RISK BASED AUDIT PLANNING APPROACH*

The OIA used a systematic approach in identifying critical risks to develop the Plan. The risk assessment results were summarized and prioritized into an overall audit plan that addresses critical risks while taking into consideration ETF's operational needs and available resources. (See Appendix A for Budget.) The following was the approach taken in developing the Plan:

| Scope Understanding | Information Gathering | Information Analysis | Audit Plan Development | Audit Plan Approval |
|---|---|---|---|---|
| • Gained understanding of current risk environment by reading publications, attending professional conference and training<br>• Gained understanding of ETF's strategic objectives and key initiatives by attending Agency Management Council and other executive and management meetings | • Updated audit universe based on revised Business Capability Model of Enterprise Architecture<br>• Updated risk assessment template and instructions<br>• Surveyed divisions/offices on their assessment of risks | • Gathered and assessed input from members of management team, and subject matter experts<br>• Developed a preliminary Plan based on interviews, risk assessment results and available resources | • Discussion with the Secretary's Office on:<br>  • Risk assessment results<br>  • Concerns and priorities of the Executive Team<br>  • Potential audit focus areas<br>• Gathered input from the Audit Committee members and made necessary adjustments to the Plan<br>• Finalized draft audit plan for approval | • Review and discuss the proposed Plan with the Audit Committee in the June Audit Committee Meeting<br>• Obtain Audit Committee approval<br>• Publish the Audit Plan on ETF intranet |

# *TYPES OF PROJECTS TO COVER RISK AREAS*

The OIA considered the risk profile of the agency when identifying and prioritizing projects. (See Appendix B for Risk Assessment and Audit Planning.) Different functions and processes will receive different levels of review based on their importance and perceived risks. For example, consulting services will be provided to reduce high residual risk; independent audit and/or agreed upon procedures will be performed to provide reassurance that management identified internal controls are adequate and operating effectively. There are four levels of review that the OIA will use to cover risk areas:

**Audit**
Responding to high and medium risks with assurance provided

- Provide assurance
- Issue audit report
- Estimated effort of each audit: 320 - 400 hours

**Consulting**
Responding to request for formal study or assessment of high-risk areas with relative quicker turnaround time

- Provide no assurance but provide formal recommendations
- Issue consulting report or memo as deliverable; significant deficiency identified would be reported to senior management and the Audit Committee as required by professional auditing standard
- Estimated effort of each consulting service: 280 - 360 hours

**Agreed-upon Procedures (AUP)**
Routine testing of specific data, transactions and calculations

- Perform specific testing procedures agreed to with management
- Report on results by issuing brief memo to management
- Estimated effort of each project: 40 – 80 hours

**Advisory**

- Participate in activities in a non-voting member capacity
- Provide verbal comments or a brief memo to management

The OIA will continue to explore Computer Assisted Auditing Techniques to enhance Agreed-upon Procedures and data analytical capacity for continuous auditing.

# *RISK THEMES*

The OIA compiled risks from all the interview sessions and aggregated them to remove redundancies. The risks were then categorized into the following four “Risk Theme.” This process, by its nature, is subjective and based on the auditor’s experience and professional judgement.

### 1 Data Quality and Protection

Inaccurate and/or incomplete data can lead to poor customer service, inaccurate financial reporting, error in actuarial estimates, and ineffective or incorrect decision making. Failure to properly protect sensitive data may cause unauthorized use and/or disclosure.

### 2 Change Management

Failure to effectively manage and execute changes may result in inefficiency, increased cost, delayed project timeline, low employee morale and poor service delivery.

### 3 Third Party

Inadequate third-party risk management may increase ETF’s exposure to regulatory, financial, operational and reputational risks.

### 4 Transaction Processing

Increased difficulty in supporting legacy applications may result in incorrect, incomplete or untimely transaction processing.

# *AUDIT FOCUS AREAS*

There are a number of discrete risk areas that support the broader Risk Themes identified on the preceding page, as showcased in the table below. These risk areas have been subjectively placed on a heat map on the following page.

## 1 Data Quality and Protection

- WRS Member Contact Information
- Health Plan Enrollment
- Sick Leave Reporting
- WRS Data Integrity
- System Interface (IT)
- Legacy Application General Controls (IT)
- Breach Response (IT)
- Data Loss Prevention (IT)
- Equipment and Data Protection (IT)

## 2 Change Management

- Resources Management
- Portfolio Intake Process
- ECM Record Processing
- Open Record Request
- System Development Life Cycle (IT)

## 3 Third Party

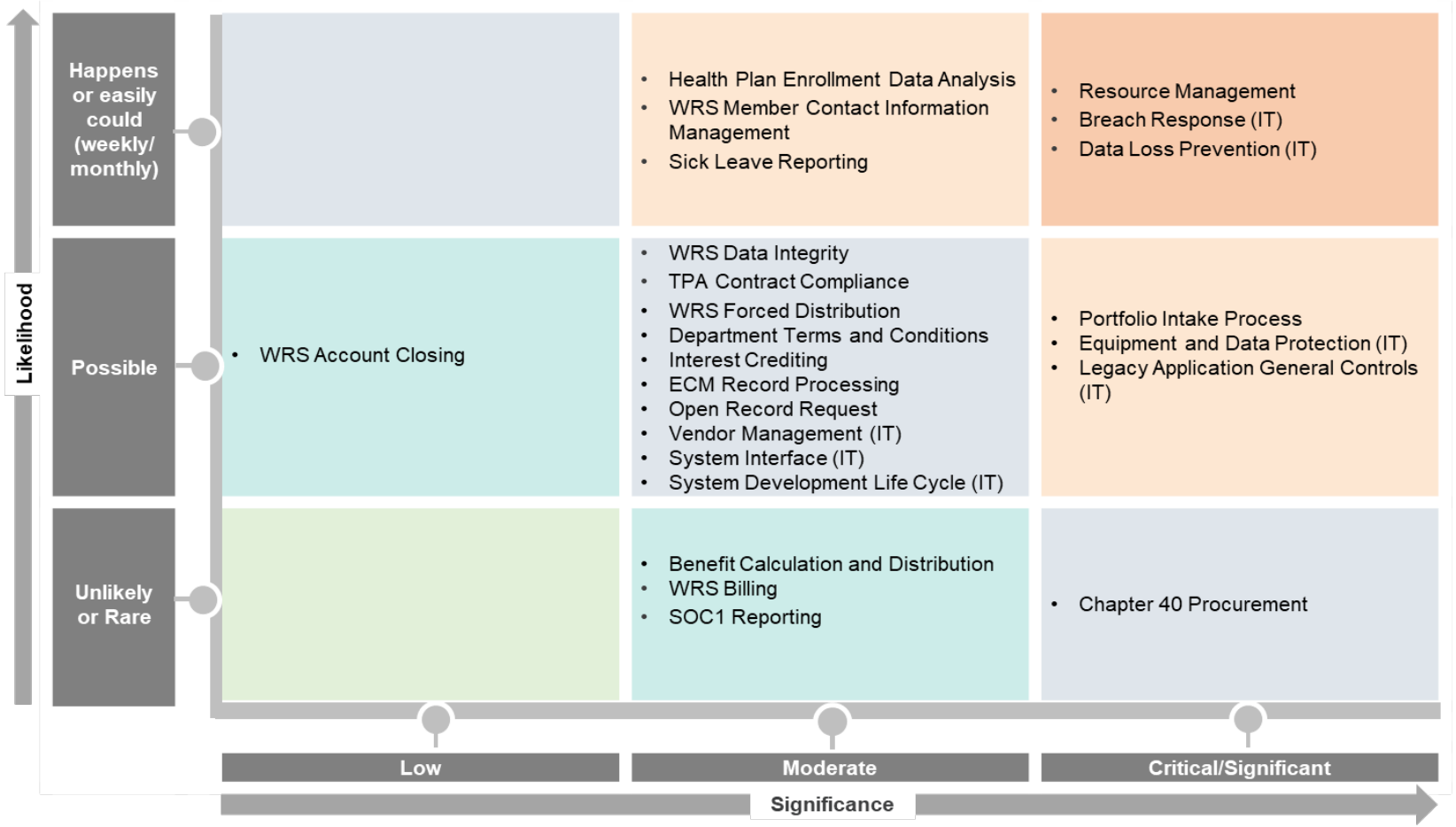
- Department Terms and Conditions
- TPA Contract Compliance
- SOC1 Reporting
- Chapter 40 Procurement
- Vendor Management (IT)

## 4 Transaction Processing

- WRS Account Closing
- Interest Crediting
- WRS Forced Distribution
- Benefit Calculation and Distribution
- WRS Billing

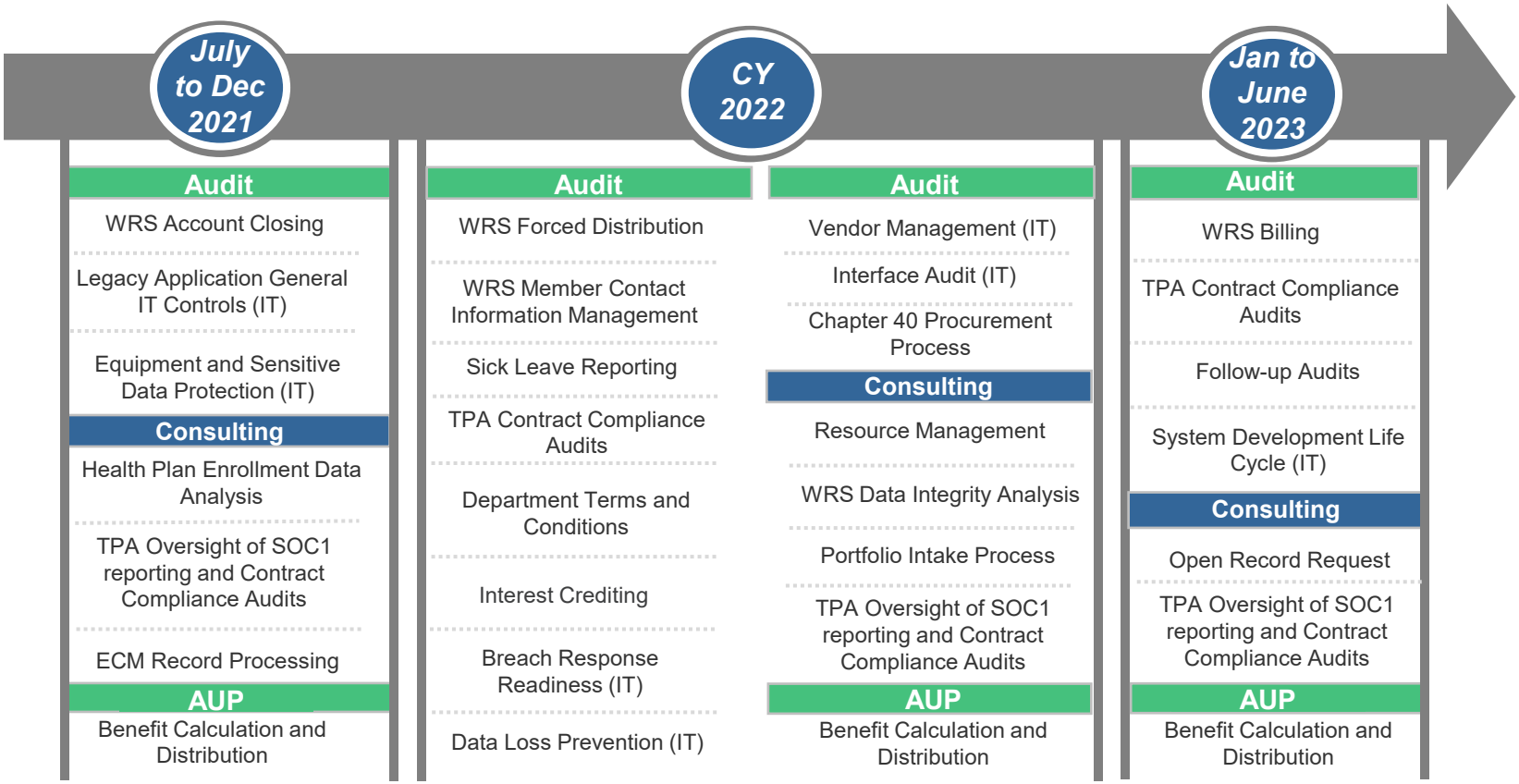
# *HEAT MAP*

Based on interviews performed, OIA subjectively mapped the residual risks identified based on Likelihood and Significance to ETF. The results of this mapping exercise plays a role in the prioritization and scheduling of proposed engagements.



# *PROPOSED AUDIT PLAN*

OIA developed the Plan based on the risk assessment results, audit coverage across ETF for the past five years, timing of ETF initiatives, and available resources. This plan will be refreshed annually, via inquiry with a select group of leadership / stakeholders, to confirm accuracy based on changing risk conditions and external factors that may impact ETF.



# *ENGAGEMENT DESCRIPTIONS*

The tables on this page and the following pages summarize the audit projects, by business processes, defined by the Business Capability Model. Objectives and scopes will be finalized in each project's formal planning phase.

## Provide and Administer Benefits

| Engagement Focus | Timing | Description |
|---|---|---|
| **Health Plan Enrollment Data** | FY22 | Conduct a pilot enrollment data analysis for eligibility and determine whether an audit on a larger scale is beneficial |
| **Member Contact Information Management** | FY22 | Determine the extent to which ETF has processes in place to ensure member contact information is appropriately maintained |
| **Benefit Calculation and Distribution** | FY22 & FY23 | Periodic sample testing of data and transactions to gain additional assurance on WRS benefits' calculation and distribution |
| **Forced Distribution** | FY23 | Determine whether ETF has processes in place to ensure compliance with IRS Required Minimum Distribution for retirement benefits |
| **Interest Crediting** | FY23 | Determine whether internal controls are adequately designed and operating as intended for the annual interest crediting process |
| **WRS Account Closing** | FY22 | Review WRS account closing process and determine the extent to which the non-compare process is working as intended |
| **WRS Data Integrity Analysis** | FY23 | Perform data analysis on WRS accounts to ensure data integrity, and develop data analysis scripts for future automated tests |
| **WRS Billing** | FY23 | Review WRS employer invoicing process for adequate controls, specifically the process for over and under contributions by employers |
| **Sick Leave Reporting** | FY22 | Review sick leave hours reported by employers to ensure accuracy and appropriateness |

# *ENGAGEMENT DESCRIPTIONS*

## Manage Programs and Policy

| Engagement Focus | Timing | Description |
|---|---|---|
| **Department Terms and Conditions** | FY23 | Determine whether ETF has processes in place to ensure Department Terms and Conditions are appropriately maintained and applied |
| **TPA Contract Compliance Audits and Audit Oversight** | FY22 & FY23 | Facilitate the review of service organization control reports, oversee TPA contract compliance audits and perform contract compliance audits (see Appendix C for benefit programs administered by the TPAs) |

## Develop, Align and Deploy Strategy

| Engagement Focus | Timing | Description |
|---|---|---|
| **Resource Management** | FY22 | Determine whether the resource management tool is being used effectively to support organization initiatives |
| **ECM Record Processing** | FY22 | Conduct before and after ECM implementation reviews to ensure appropriate processing procedures and adequate controls |
| **Portfolio Intake Process** | FY22 | Determine the extent to which the portfolio intake process is operating as designed |

# *ENGAGEMENT DESCRIPTIONS*

## Support Relationships

| Engagement Focus | Timing | Description |
|---|---|---|
| **Open Record Request** | FY23 | Evaluate the Open Record Request process for adequate documentation, appropriate controls and identify potential process improvement opportunities |

## Enable Delivery

| Engagement Focus | Timing | Description |
|---|---|---|
| **Chapter 40 procurement process** | FY22 | Assess Chapter 40 procurement process for adequate documentation, transparency and appropriate controls |

# *ENGAGEMENT DESCRIPTIONS*

## Enable Delivery – Information Technology

| Engagement Focus | Timing | Description |
|---|---|---|
| **IT General Control** | FY22 | Confirm the operating effectiveness of IT general controls for a sample of legacy applications related to security, change management/system development, batch scheduling, and backup and recovery |
| **System Development Life Cycle (SDLC)** | FY23 | Evaluate the following of SDLC methodology and the utilization of sound project management and change management disciplines |
| **Breach Response Readiness** | FY22 | Review the breach response plan for appropriate steps regarding incident containment, eradication, recovery and follow-up, and evaluate the processes in place to react to a data breach or security incident |
| **Data Loss Prevention** | FY23 | Identify where sensitive data is located and determine how sensitive data is controlled to effectively manage risks associated with data transfer / data transmission |
| **Equipment and Sensitive Data Protection** | FY22 | Evaluate anti-theft security measures for effective protection of sensitive data on ETF mobile computing devices |
| **Vendor Management** | FY23 | Evaluate the vendor management processes including due diligence, security, contract compliance and quality of and ability to rely on vendor's attestation regarding internal controls |
| **IT Interfaces** | FY23 | Evaluate controls between interfaces to confirm that data transmissions are complete and accurate |

# *APPENDIX A - Budget*

# ESTIMATED OIA HOURS

| | Audit Director | Internal Auditors | Summary | |
|---|---|---|---|---|
| Total Hours - Biennial | 4,160 | 12,480 | 16,640 | 100% |
| | | - | | |
| Less | | - | | |
| Meetings | 500 | 450 | 950 | 6% |
| General Administration | 354 | 824 | 1,178 | 7% |
| Training | 100 | 240 | 340 | 2% |
| Holidays and Personal | 216 | 648 | 864 | 5% |
| Vacation and Sick Leave | 400 | 1,650 | 2,050 | 12% |
| | 1,570 | 3,812 | 5,382 | 32% |
| Internal Audit Activities | | | | |
| Audit Recommendation Follow-up | 20 | 60 | 80 | |
| Audit Manual and Charter Update | 40 | - | 40 | |
| Biennial Audit Planning | 280 | - | 280 | |
| Data Analysis Buildout | 20 | 200 | 220 | |
| Audit Management Software Upgrade | 80 | 80 | 160 | |
| Internal Quality Assurance Review | 300 | 100 | 400 | |
| Fraud Program Oversight and Hotline Monitoring | 80 | 40 | 120 | |
| | 820 | 480 | 1,300 | |
| **Total Available Audit Hours** | **1,770** | **8,188** | **9,958** | **60%** |
| Project Hours | | | | |
| Planned | 1,144 | 5,911 | 7,055 | **71%** |
| Reserved* | 626 | 2,278 | 2,903 | **29%** |

* Hours available to conduct TPA audits and Follow-up Audits

# *APPENDIX B - Risk Assessment And Audit Planning*

# *RISK ASSESSMENT AND AUDIT PLANNING*

## Risk Definition

Risk is defined as “the possibility that an event will occur and adversely affect the achievement of objectives.”

## Overall Risk Assessment (Risk Scores)

OIA took each of the auditable areas from the Business Capability Model and assigned an overall risk score based on the following weighted risk factors: Dollar Size or Transaction Volume (15%), Program Complexity (15%), Maturity Level of Business Capability (25%), Control Environment (35%), and Time Since Last Audit (10%). The risk scores were used as an indicator to determine whether detailed risk assessment needed to be performed.

## Detailed Risk Assessment *(Likelihood and Impact)*

OIA interviewed Bureau Directors and subject matter experts to confirm the likelihood and impact assessment of specific risks identified of business functions with a risk score of 3 or above. Financial risk, operational risk, reputational risk, compliance risk and strategic risk were considered and analyzed; although fraud risk is generally discussed at this biennial planning phase, typical risk assessment has always been performed at the engagement level. OIA sought input from Division Administrators, Secretary’s Office, and Audit Committee to ensure that significant risks or major concerns were captured at this detailed risk assessment phase.

Please refer to **Figure 1** Risk Assessment Guidance for definitions and examples.

## Audit Planning

The result of the detailed risk assessment, played a significant role in the prioritization and scheduling of proposed engagements. Also being considered, was the overall audit coverage. OIA analyzed audit coverage across ETF for the past five years when developing the new biennial audit plan to ensure that the new audit plan provides appropriate audit coverage that aligns with the Audit Frequency Guideline of auditing high-risk rating areas within three years, moderate risk rating areas every 4 to 5 years, and low risk areas every 6 to 7 years.

Please refer to **Figure 2** Audit Coverage for the details.

# *RISK ASSESSMENT AND AUDIT PLANNING (CONT.)*

**Figure 1**. Risk Assessment Guidance – Assessment Criteria and Examples

| Impact / Significance Scale | | | | | | | | |
|---|---|---|---|---|---|---|---|---|
| **IMPACT** | **Financial*** | | **Reputation*** | **Operational*** | **Compliance*** | **Strategic*** | **Description** | **Example of Operational Risk** |
| | **Statements** | **Other** | | | | | | |
| **(5) Critical** | > $1BLN | Greater than 15% of operating budget or program assets | Irreversible damage to ETF reputation and credibility; Irreversible loss of member confidence | Complete stoppage of business services for foreseeable future | Violation(s) resulting in widespread data loss, monetary fines, regulatory intervention, etc. | Failure to meet ETF's strategic goals | The risk will cause the objective to not be achieved | No training can be provided to users before the deployment of the new system |
| **(4) High** | $100M - $1BLN | Between 10% and 15% of operating budget or program assets | Adverse media exposure is persistent and in multiple publications; Increase in member inquiries | Widespread disruption to service levels, business activities, and/or critical processes | Significant violation(s) of laws, guidelines, or breach of fiduciary duty | Significant delays or reductions in scope of ETF's goals | The risk will cause major elements of objectives to be delayed or not be achieved | Limited training will be provided to some users before the deployment of the new system |
| **(3) Moderate** | $1M - $100M | Between 5% and 10% of operating budget or program assets | Media exposure includes criticism from several sources; Members remain confident | Temporary disruption to service levels and/or business activities; Minor impact on critical processes | Moderate violation, potentially leading to increased scrutiny | Delays or revisions to ETF's strategic goals | The risk will cause some elements of objectives to be delayed or not be achieved | Adequate training will be provided to critical users before the deployment of the new system |
| **(2) Low** | $100K - $1M | Between 1% and 5% of operating budget or program assets | Local/limited media exposure having minimal impact on reputation | Minor/temporary impact to service levels and/or business activities; No impact to critical processes | Minor legal/compliance violations | Minor delays or revisions to goals | The risk will cause some minor elements of objective to be delayed | Adequate training will be provided to the majority of users before the deployment of the new system |
| **(1) Incidental** | <$100K | Less than 1% of operating budget or program assets | No impact to ETF's reputation | No impact to service levels, business activities or critical processes | No legal/compliance violations | No impact to achievement of goals | The risk will not substantively impede the achievement of the objective | Adequate training will be provided to all users before the deployment of the new system |

| Likelihood/Probability Scale | | | | |
|---|---|---|---|---|
| | **Description** | **Example of Operational Risk** | **CONSIDERATIONS** | |
| **PROBABILITY** | **Within the time horizon contemplated by the objective** | **Objective: adequate training is provided to all users before the deployment of the new IT system** | **Inherent** | **Residual** |
| **(5) Expected** | The risk is expected to occur | No resource is attainable to provide required training | - Program Complexity<br>- Regulatory Environment<br>- Estimates Used<br>- Susceptibility to Change<br>- Historical Experience<br>- Frequency/volume of activity<br>- External Oversight<br>- Number of processes and systems involved | - Overall control environment: culture and ethical value; organization structure; oversight and accoutability<br>- Risk identification and analysis<br>- Internal control activities<br>- Policies and procedures<br>- Skills and competencies of staff performing control activities |
| **(4) Likely** | The risk is seen as likely to occur | Resource is very limited to provide required training | | |
| **(3) Possible** | The risk is seen as probable to occur | Additional resource needs to be brought in to provide required training | | |
| **(2) Unlikely** | The risk is seen as unlikely to occur | Current resource can be re-arranged to provide required training | | |
| **(1) Remote** | The risk is seen as very rare to occur | Current resource is almost certain to be able to provide required training | | |

*__Financial Risk__ - Risk that could result in a negative financial impact to the organization in term of waste or loss of assets / financial statement material misstatement/misrepresentation
*__Reputational Risk__ - Risk that could expose the organization to negative publicity
*__Operational Risk__ - Risk that could disrupt operations or prevent the organization from operating in the most effective and efficient manner
*__Compliance Risk__ - risk that could expose the organization to fines and penalties from a regulatory agency due to non-compliance with laws and regulations
*__Strategic Risk__ - Risk that would prevent an organization from accomplishing its mission and strategic goals
Fraud Risk is tipically discussed at the planning stage, but further assessed at the engagement level

# *RISK ASSESSMENT AND AUDIT PLANNING (CONT.)*

**Figure 2**. Audit Coverage

| | | Risk Assessment | | | Audit Coverage (Calendar Year) | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|
| | | Overal Score | Inherent Risk | Residual Risk | 2016 | 2017 | 2018 | 2019 | 2020 - June 2021 | New Audit Plan |
| **Auditable Areas - by Enterprise Architecture Business Capability** | | | | | | | | | | |
| 1.1 | Enroll in Benefit Programs | 3.92 | High | Medium | x | | | | | x |
| 8.3 | Manage Change | 3.83 | High | Medium | | | | | | x |
| 7.3 | Execute Strategy | 3.73 | High | Medium | | | | | | x |
| 11.2 | Manage Procurement | 3.70 | High | Medium | | | | | | x |
| 2.2 | Manage Employer Benefit Participation | 3.69 | High | Medium | | | | | x | |
| 2.4 | Manage Employer Reporting and Contributions | 3.66 | High | Medium | x | | | | x | x |
| 9.1 | Develop and Manage Human Resource Planning, Policies, and Strategies | 3.65 | High | Medium | | | | | | |
| 4.2 | Manage Enterprise Policy | 3.62 | High | Medium | | | | | | x |
| 2.1 | Onboard Employer and Select Benefit Participation | 3.62 | High | Medium | | | | | x | |
| 8.2 | Manage Portfolio, Programs, and Projects | 3.59 | High | Medium | | | | | | x |
| 8.1 | Manage Enterprise Processes, Quality and Performance | 3.58 | High | Medium | | | | | | |
| 2.3 | Provide Employer Customer Assistance | 3.49 | High | Medium | | | | | x | |
| 4.1 | Manage Program Policy and Program Rates | 3.43 | High | Medium | | | | x | x | x |
| 1.4 | Maintain Account After Distribution | 3.39 | High | Medium | | | | | | x |
| 1.3 | Distribute Benefits | 3.36 | High | Medium | x | x | | x | | x |
| 10.4 | Manage Data Services | 3.36 | High | Medium | | | | | | x |
| 12.4 | Manage Program Compliance | 3.35 | High | Medium | | | x | | | |
| 7.2 | Develop Business Strategy | 3.34 | High | Medium | | | | | | |
| 7.1 | Define the Business Concept and Long-Term Vision | 3.30 | High | Medium | | | | | | |
| 10.2 | Manage Technology Solution Services | 3.27 | High | Medium | | | | | x | x |
| 9.2 | Manage Employee Lifecycle | 3.24 | High | Medium | | | | | | x |
| 10.3 | Manage Technology Infrastructure Services | 3.20 | High | Medium | | | | | x | x |
| 10.1 | Manage Personal Technical Support Services | 3.20 | High | Medium | | | | x | | x |
| 1.2 | Provide Customer Service | 3.11 | High | Medium | | | x | | | x |
| 11.3 | Manage Contracts and Vendors | 3.00 | High | Medium | | | x | | | |
| 12.3 | Manage Information Risk | 2.87 | High | Medium | | | | | x | x |
| 5.2 | Manage Financial Reporting | 3.06 | High | Low | | | | | | |
| 11.1 | Manage Agency Budget | 2.98 | High | Low | | | | | | |
| 12.2 | Manage External Audit | 2.41 | High | Low | x | x | x | x | x | x |
| 5.1 | Account for TPA Payments | 2.18 | High | Low | | | x | | | |
| 3.1 | Train and Educate Members and Employers | 3.65 | Medium | Low | | | | | x | |
| 8.4 | Develop and Manage Enterprise Knowledge | 3.62 | Medium | Low | | | | | | x |
| 3.3 | Voice of the Customer Feedback | 3.42 | Medium | Low | | | | | | |
| 9.3 | Manage Employee Information and Analytics | 3.26 | Medium | Low | | | | | | x |
| 6.2 | Manage Legal Issues | 3.23 | Medium | Low | | | | | | x |
| 3.2 | Member and Employer Communications | 3.22 | Medium | Low | | | | | x | |
| 6.1 | Manage Government and Industry Relationships | 3.06 | Medium | Low | | | | | | |
| 6.3 | Manage Media Relations | 3.04 | Medium | Low | | | | | | |
| 4.4 | Program Oversight and Process Development | 2.91 | Medium | Low | | | | | x | x |
| 4.3 | Manage Board Governance Policy | 2.90 | Medium | Low | | | | | | |
| 11.4 | Pay Agency Expenses | 2.44 | Medium | Low | | x | | | | |
| 9.4 | Manage Facilities | 2.43 | Medium | Low | | | | x | | |
| 12.1 | Manage Internal Audit | | | | | | | | | |

# *APPENDIX C – Third-Party Administrators*

# *TPA AUDITS*

| Program | TPA | Audit Frequency | Calendar Year Last Review Completed |
|---|---|---|---|
| **Deferred Compensation Program** | Empower Retirement | Biennial (Covers One Year Only) | 2019 |
| **Income Continuation Insurance (ICI)** | The Hartford | Triennial | 2017 |
| **Pharmacy Benefit Manager** | Navitus | Annual | 2020 |
| **Employee Reimbursement Account/HSA/Commuter Benefits** | Connect Your Care | Biennial | 2019 |
| **Life Insurance** | Securian | Biennial | 2019 |
| **Uniform Dental** | Delta Dental | Biennial | 2018 |
| **Wellness and Disease Management** | StayWell | Triennial | 2019 |