

The Texas A&M University System Internal Audit Department



Monthly Audit Report
March 11, 2026

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Texas A&M University College of Performance, Visualization and Fine Arts: Information Technology
The overall objective of this audit was to determine if internal controls over information technology at the College of Performance, Visualization, and Fine Arts are operating as intended and in compliance with applicable laws and policies.

This report is excepted from public disclosure per Chapter 552.139 of the Texas Government Code.

Texas A&M University-Central Texas:
Contract Administration

Texas A&M University-San Antonio:
Facilities Development Reporting to the Texas Higher Education Coordinating Board

Texas A&M International University:
Facilities Development Reporting to the Texas Higher Education Coordinating Board

Texas A&M University-Kingsville:
Facilities Development Reporting to the Texas Higher Education Coordinating Board



System Internal Audit

THE TEXAS A&M UNIVERSITY SYSTEM

TEXAS A&M UNIVERSITY-CENTRAL TEXAS

CONTRACT ADMINISTRATION

MARCH 11, 2026

**Amanda Dotson, CPA
Chief Auditor**



Overall Conclusion

Internal controls over contract administration at Texas A&M University-Central Texas are operating as intended and in compliance with applicable laws and policies. An opportunity for improvement was noted in regard to documenting the conflict of interest review process.

Texas A&M University-Central Texas had 646 active contracts during fiscal year 2025 with a total value exceeding \$31.8 million over the life of the contracts. Of these contracts, 338 were initiated during fiscal year 2025 including two with total values exceeding \$1 million, ten valued between \$100,000 and \$1 million, and the remaining contracts valued at less than \$100,000.

Summary Table

Audit Areas	Controls Assessment
Conflict of Interest/Financial Disclosures	Needs Some Improvement
Contract Approvals and Renewals	Effective – No Observations
Contract Monitoring and Compliance	Effective – No Observations
Contract Reporting	Effective – No Observations
Required Training	Effective – No Observations
State of Texas Contracting Standards and Oversight	Effective – No Observations

Management concurred with the audit recommendation and indicated that implementation will occur by January 31, 2027.

Detailed Results

1. Conflict of Interest/Financial Disclosures

Documentation supporting review of contracts for potential conflicts of interest was not retained. All ten contracts tested lacked evidence that a review of potential conflicts of interest was performed prior to awarding the contract. There is no defined process for retaining documentation of this review. System Policy 7.03, *Conflicts of Interest, Dual Office Holding and Political Activities*, requires that disclosures be completed by certain employees to ensure they have no financial interest in private vendors contracting with the university. Failure to identify potential conflicts of interest when executing a contract increases the risk of legal exposure, reputational harm, and compromised objectivity in contracting decisions.

Recommendation

Implement a process to document and retain the review of potential conflicts of interest prior to contract approval to ensure compliance with system policies.

Management's Response

Corrective Action: Texas A&M University-Central Texas has reviewed this recommendation and will implement a process to ensure compliance with *System Policy 7.03* regarding potential conflicts of interest. The A&M-Central Texas Contract Administration Office will develop and implement an additional step in the Delegation of Authority Acknowledgement process to ensure that all member employees noted in *Policy 7.03, section 1.5(b)* are required to disclose any potential conflicts of interest annually. Delegation of Authority Acknowledgement is typically updated at the beginning of the fiscal year. New employees, including employees promoted to such a position, who are required to disclose will do so during onboarding through submission of the Annual Delegation of Authority and Compliance Acknowledgment Form.

The A&M-Central Texas Compliance Office will review and approve the Annual Delegation of Authority and Compliance Acknowledgment Form as they are submitted. In addition, the Compliance Office will be responsible for collection and review of the *Annual Financial Disclosure Form* and the *Contracting Financial Interest Disclosure and Certification Form* at the beginning of each calendar year.

Any potential conflicts of interest disclosed in either process will be reported to the Contract Administration Office for review against the contract database to

ensure compliance and prevent conflicts of interest. The Contract Administration office will not route or submit a contract for signatures until:

- All required disclosures have been completed,
- The Compliance Office has reviewed the information and addressed any identified conflicts, and
- No unresolved conflicts remain that would restrict signature authority.

Positions Responsible: Vice President for Finance & Administration and Chief Ethics and Compliance Officer

Implementation Date: January 31, 2027

Basis of Audit

Objective, Scope, & Methodology

The overall objective of this audit was to determine whether internal controls and processes over contract administration at Texas A&M University-Central Texas are operating as intended and in compliance with applicable laws and policies.

The audit focused on the following areas:

- Conflict of interest/financial disclosures
- Contract approvals and renewals
- Contract monitoring and compliance
- Contract reporting
- Required training
- State of Texas contracting standards and oversight

The audit period was primarily September 1, 2024 to August 31, 2025. Fieldwork was conducted from October 2025 to January 2026.

Our audit methodology included gaining an understanding of processes in place through interviews, observation, and review of documentation as well as testing of data using sampling as follows:

Audit Objective	Methodology
<p data-bbox="370 1226 734 1289"><u>Conflict of Interest/Financial Disclosures</u></p> <p data-bbox="370 1339 805 1478">Determine whether conflict of interest disclosures related to contracting are in compliance with state and university requirements.</p>	<p data-bbox="868 1226 1352 1514">Auditors gained an understanding of the university’s conflict of interest and annual financial disclosure processes. Auditors reviewed conflict of interest and annual financial disclosures to verify disclosures were properly filed by specified university management personnel.</p> <p data-bbox="868 1564 1369 1818">Additionally, auditors used professional judgment to select a nonstatistical sample of ten contracts based upon magnitude and risk to determine whether a review for potential conflicts of interest was performed prior to contract approval.</p>

Audit Objective	Methodology
<p><u>Contract Approvals and Renewals</u></p> <p>Determine whether contracts were properly approved and renewed.</p>	<p>Auditors used professional judgment to select a nonstatistical sample of ten contracts based upon magnitude and risk.</p> <p>Executed contracts were obtained and reviewed for proper approval and compliance with diversity, equity, and inclusion restrictions. Contracts were also reviewed for timely approval and renewals as applicable.</p>
<p><u>Contract Monitoring and Compliance</u></p> <p>Determine whether selected contract terms are monitored and in compliance with contract requirements.</p>	<p>Auditors used professional judgment to select a nonstatistical sample of ten contracts based upon magnitude and risk.</p> <p>Twenty-one contract terms were judgmentally selected based on risk and reviewed for evidence of monitoring and compliance with contract requirements.</p>
<p><u>Contract Reporting</u></p> <p>Determine whether contract information is being reported in compliance with state contract reporting requirements.</p>	<p>Auditors used professional judgment to select a nonstatistical sample of ten contracts based upon magnitude and risk.</p> <p>Auditors verified whether contract reporting information and forms were properly submitted to the Legislative Budget Board and the Texas Ethics Commission as required.</p>
<p><u>Required Training</u></p> <p>Determine whether contracting employees completed training in compliance with state and university requirements.</p>	<p>Auditors reviewed the university's delegation of authority to identify employees with authority to sign contracts or who may exercise discretion in awarding contracts based on employee titles.</p>

Audit Objective	Methodology
	<p>Auditors reviewed training and certification documentation to ensure all contracting employees identified completed training in compliance with Texas Government Code 656.051 and Texas Education Code 51.9337, which includes:</p> <ul style="list-style-type: none"> • Training and/or certification for purchasing personnel • Training for contract signatories
<p><u>State of Texas Contracting Standards and Oversight</u></p> <p>Determine whether the university is complying with state contracting standards and oversight requirements.</p>	<p>Auditors gained an understanding of processes in place to address Texas Government Code 2261.</p> <p>Documentation of the following processes was reviewed for evidence of compliance:</p> <ul style="list-style-type: none"> • Disclosure of potential financial conflict of interest and prohibited contracts • Posting of certain contracts • Procedure to identify contracts requiring enhanced monitoring and A&M System reporting • Completion of contract reporting form for contracts \$1 million or more • Certification of solicitation process for contracts over \$5 million • Purchasing accountability and risk analysis guidelines

Controls Assessment Classification

Audit areas highlighted in red in the Summary Table are considered to have significant weaknesses in internal controls. Significant weaknesses include errors, deficiencies or conditions which result in one or more violations of internal controls, laws, A&M System policies, or member rules. These violations have a high probability for legal consequences, financial consequences, or negative impacts to the organization's reputation. These are situations in which a CEO, Provost, Vice President, Dean, or Director need to be involved in the problem resolution.

Audit areas highlighted in yellow in the Summary Table are considered to have notable weaknesses in internal controls. Notable weaknesses include errors, deficiencies or conditions which result in minor to moderate noncompliance with internal controls, laws, A&M System polices, or member rules. These are situations which can and should be corrected at the department or supervisor level.

Audit areas highlighted in green in the Summary Table are considered to have effective internal controls.

Items that were not significant or notable were communicated to management during the audit.

Criteria

Our audit was based upon the following:

- Texas A&M University System Policies and Regulations
- Texas A&M University-Central Texas Rules and Standard Administrative Procedures
- Stated contract stipulations
- Texas A&M University System *Contract Management Handbook*
- Texas Government Code 2261, *State Contracting Standards and Oversight*
- Texas Government Code 656.051, *Training and Certification of State Agency Purchasing Personnel and Vendors*
- Texas Education Code 51.9337, *Purchasing Authority Conditional; Required Standards*
- Texas Education Code 51.3525, *Responsibility of Governing Boards Regarding Diversity, Equity, and Inclusion Initiatives*
- Texas Executive Order GA-48, *Hardening of State Government*
- General Appropriations Act, Article IX, Section 7.04, *Contract Notification: Amounts Greater than \$50,000*
- Other sound administrative practices

The audit was conducted in conformance with the Institute of Internal Auditors' *Global Internal Audit Standards*. Additionally, we conducted the audit in accordance with generally accepted government auditing standards (GAGAS). Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives. The Office of Internal Audit is independent per the GAGAS standards for internal auditors.

Audit Team

Brian Billington, CPA, Director
Danielle Carlson, CPA, CIA, Senior Manager
Nancy Hodgins, CPA
Lynette Shimek
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Mr. Todd Lutz, Vice President for Finance and Administration
Ms. Melissa Barlow, Associate Director of Finance and Administration
Ms. Deserie Mensch, Chief Compliance Officer



System Internal Audit

THE TEXAS A&M UNIVERSITY SYSTEM

TEXAS A&M UNIVERSITY-SAN ANTONIO

FACILITIES DEVELOPMENT REPORTING TO THE TEXAS HIGHER EDUCATION COORDINATING BOARD

MARCH 11, 2026

**Amanda Dotson, CPA
Chief Auditor**



Overall Conclusion

Texas A&M University-San Antonio is in compliance with applicable Texas Higher Education Coordinating Board (THECB) facilities development project reporting requirements.

Summary Table

Audit Areas	Controls Assessment
Development Projects	Effective – No Observations
Energy Savings Performance Projects	Effective – No Observations
Improved Real Property Acquisitions	Effective – No Observations

Basis of Audit

Objective, Scope, & Methodology

The overall objective of this audit was to determine if development projects, energy savings performance projects, and improved real property acquisitions complied with certification, application, and approval requirements, as applicable.

The audit focused on the following areas:

- Development projects
- Energy savings performance projects
- Improved real property acquisitions

The audit period was primarily September 1, 2018 through August 31, 2025. Fieldwork was conducted from September 2025 to February 2026.

Our audit methodology included gaining an understanding of processes in place through interviews, observation, and review of documentation as well as testing of data using sampling as follows:

Audit Objective	Methodology
<u>Development Projects</u> Determine whether development projects complied with THECB requirements for certifications and applications.	 Auditors reviewed the population of construction and renovation projects for the audit period and selected the five projects subject to THECB requirements for testing. Auditors obtained and reviewed documentation to determine if certifications and applications were submitted in compliance with THECB requirements. For the projects completed, auditors determined if the THECB facilities database was updated.
<u>Energy Savings Performance Projects</u> Determine whether energy savings performance projects complied with THECB requirements for	 There were no energy savings performance projects during the audit period.

Audit Objective	Methodology
certifications, applications, and contract approvals.	
<u>Improved Real Property Acquisitions</u> Determine whether improved real property acquisitions complied with THECB requirements for certifications and applications.	Auditors reviewed the population of real property acquisitions for the audit period and determined no acquisitions were subject to THECB requirements.

Controls Assessment Classification

Audit areas highlighted in red in the Summary Table are considered to have significant weaknesses in internal controls. Significant weaknesses include errors, deficiencies or conditions which result in one or more violations of internal controls, laws, A&M System policies, or member rules. These violations have a high probability for legal consequences, financial consequences, or negative impacts to the organization’s reputation. These are situations in which a CEO, Provost, Vice President, Dean, or Director need to be involved in the problem resolution.

Audit areas highlighted in yellow in the Summary Table are considered to have notable weaknesses in internal controls. Notable weaknesses include errors, deficiencies or conditions which result in minor to moderate noncompliance with internal controls, laws, A&M System polices, or member rules. These are situations which can and should be corrected at the department or supervisor level.

Audit areas highlighted in green in the Summary Table are considered to have effective internal controls.

Items that were not significant or notable were communicated to management during the audit.

Criteria

Our audit was based upon the following:

- Texas A&M University System Policies and Regulations
- Texas Administrative Code Title 19, Part 1, Chapter 17
- Texas Higher Education Coordinating Board's 2023 Facilities Audit Protocol
- Other sound administrative practices

The audit was conducted in conformance with the Institute of Internal Auditors' *Global Internal Audit Standards*. Additionally, we conducted the audit in accordance with generally accepted government auditing standards (GAGAS). Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives. The Office of Internal Audit is independent per the GAGAS standards for internal auditors.

Audit Team

Robin Woods, CPA, CIA
Jessica Bolding, CPA, CIA
Aliza Monroe, CIA

Distribution List

Texas A&M University-San Antonio

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Dr. Mohamed Abdelrahman, Provost and Senior Vice President for Academic Affairs
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Ms. Corrin Le Vasseur, Executive Director of Operations
Mr. Ernest Haffner, Director of Facilities and Construction
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Mr. Ryan Griffin, Vice Chancellor and Chief Financial Officer
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Mr. Clint Cooper, Executive Director, Real Estate
Mr. Brett McCully, Chief Facilities Officer
Mr. Matt Henley, Executive Director, Facilities and Construction
Mr. Peter Schmid, Director, Facilities and Construction
Ms. Janet Gordon, System Ethics and Compliance Officer



System Internal Audit

THE TEXAS A&M UNIVERSITY SYSTEM

TEXAS A&M INTERNATIONAL UNIVERSITY

FACILITIES DEVELOPMENT REPORTING TO THE TEXAS HIGHER EDUCATION COORDINATING BOARD

MARCH 11, 2026

**Amanda Dotson, CPA
Chief Auditor**



Overall Conclusion

Texas A&M International University is in compliance with applicable Texas Higher Education Coordinating Board (THECB) facilities development project reporting requirements.

The audit identified one energy savings performance contract at TAMIU that was not reported timely to the THECB. The university followed THECB guidance to remediate the delay during audit fieldwork and is now compliant.

Summary Table

Audit Areas	Controls Assessment
Development Projects	Effective – No Observations
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Improved Real Property Acquisitions	Effective – No Observations

Basis of Audit

Objective, Scope, & Methodology

The overall objective of this audit was to determine if development projects, energy savings performance projects, and improved real property acquisitions complied with certification, application, and approval requirements, as applicable.

The audit focused on the following areas:

- Development projects
- Energy savings performance projects
- Improved real property acquisitions

The audit period was primarily September 1, 2016 through August 31, 2025. Fieldwork was conducted from September 2025 to February 2026.

Our audit methodology included gaining an understanding of processes in place through interviews, observation, and review of documentation as well as testing of data using sampling as follows:

Audit Objective	Methodology
<p><u>Development Projects</u></p> <p>Determine whether development projects complied with THECB requirements for certifications and applications.</p>	<p>Auditors reviewed the population of construction and renovation projects for the audit period and selected the three projects subject to THECB requirements for testing.</p> <p>Auditors obtained and reviewed documentation to determine if certifications and applications were submitted in compliance with THECB requirements. For the projects completed, auditors determined if the THECB facilities database was updated.</p>
<p><u>Energy Savings Performance Projects</u></p> <p>Determine whether energy savings performance projects complied with THECB requirements for</p>	<p>The population of two projects was selected for testing. Auditors obtained and reviewed documentation to determine if certifications and applications were submitted, and THECB contract approval was received</p>

Audit Objective	Methodology
certifications, applications, and contract approvals.	in compliance with THECB requirements.
<p><u>Improved Real Property Acquisitions</u></p> <p>Determine whether improved real property acquisitions complied with THECB requirements for certifications and applications.</p>	There were no real property acquisitions during the audit period.

Controls Assessment Classification

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Audit Team

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Ms. Monica Robledo, Director of Compliance

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Mr. Peter Schmid, Director, Facilities and Construction
Ms. Janet Gordon, System Ethics and Compliance Officer



System Internal Audit

THE TEXAS A&M UNIVERSITY SYSTEM

TEXAS A&M UNIVERSITY-KINGSVILLE

FACILITIES DEVELOPMENT REPORTING TO THE TEXAS HIGHER EDUCATION COORDINATING BOARD

MARCH 11, 2026

**Amanda Dotson, CPA
Chief Auditor**



Overall Conclusion

Texas A&M University-Kingsville is in compliance with applicable Texas Higher Education Board (THECB) facilities development project reporting requirements.

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Audit Objective	Methodology
certifications, applications, and contract approvals.	
<u>Improved Real Property Acquisitions</u> Determine whether improved real property acquisitions complied with THECB requirements for certifications and applications.	Auditors reviewed the population of real property acquisitions for the audit period and determined no acquisitions were subject to THECB requirements.

Controls Assessment Classification

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