

Rob Clark, Jr., CIA, CCEP, CBM, CVP

Chief Audit & Compliance Officer

Howard University

robert.clark@howard.edu

<https://www.linkedin.com/in/robclarkjr/>

www.RobClarkJr.com

770.815.7922



Audits



Objectives of the Session

- Understand what auditors do
- Tips on how to effectively go through an audit
- Provide insights on what YOU can do to mitigate risks in your area
- Emerging issues of risk in higher education
- Using risk assessment tools in your area
- Case studies (in breakout groups)





**What's the first thing you think of
when you hear the word, "auditors"?**

[SLIDO INSERT]

What is your view of auditors?

- 1) Necessary evil
- 2) Spawn of Satan
- 3) A profession mostly for suited for individuals with poor social skills and deep emotional scars
- 4) A profession in which you actually have an opportunity to make a positive difference and help protect the organization

So, what do you do for a living?



Why is Internal Auditing the Best Job at the University?

- ✓ **Broad view of the entire institution**
- ✓ **Diverse work**
- ✓ **Exposure to all parts of organization**
- ✓ **Exposure to new technologies and practices and emerging issues**



Why It's the Best Job...

- Because we have an opportunity to help the organization and to make a difference
- What are your trophies?



Internal Auditing – Institute of Internal Auditing Definition

- “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.**”

IIA Standards for the Professional Practice of Internal Auditing

What auditors tell their friends...

- “As an internal auditor, I do for the officers and management of the university what they would do themselves, if they had the time. I act as senior management’s ‘eyes’ and ‘ears’ making sure that the university’s assets are protected and that we are being good stewards of the resources that have been entrusted to the university.”



Reporting Structure



“New Terrain”

Scott Leibs, February 01, 2004
article from CFO Magazine



- "Internal audit has always walked a fine line," says Barger. "But it's their job to look for weaknesses and fix them, and we absolutely want them to do that." Adds Paul Schmidt, controller at General Motors Corp., "We have 200 people in internal audit, and it's now a more exciting place to work. Our audit committee values them, and even when we downsize, they keep a close eye on the size of internal audit to make sure we have the resources there that we need."
- Pitney Bowes Inc. CFO Bruce Nolop goes a bit further. "**[Internal] auditors are rock stars now**," he says. "This is their day in the sun."

Emerging Issues: Rapid increase in regulatory issues over data

- Gramm-Leach-Bliley Act
- FERPA
- HIPAA
- Higher Education Opportunity Act
- GDPR
- Sarbanes-Oxley
(not yet “directly” applicable to higher ed, but indirectly)
- California SB 1386
- ... in addition to other State laws



Yates Memo



- Sept. 9, 2015, Deputy U.S. Attorney General Sally Quillian Yates memo to AGs
- “Individual Accountability for Corporate Wrongdoing”
- Imposes criminal liability on individuals to enhance the deterrent value of corporate criminal liability
- Prevention remains best defense



“Are you the guy who requested a printout of the latest Higher Education regulations?”

Whose responsibility is it to mitigate legal risks at your institution?

- General Counsel
- President/Chancellor
- Chief Compliance Officer
- Each employee of the institution

COSO Framework: Enterprise Risk Management

"Enterprise Risk Management -- Integrating with Strategy and Performance"

Define the organizational structure, board policies, management risk appetite

Define objectives for strategy, operations, reporting, & compliance

What could go wrong?

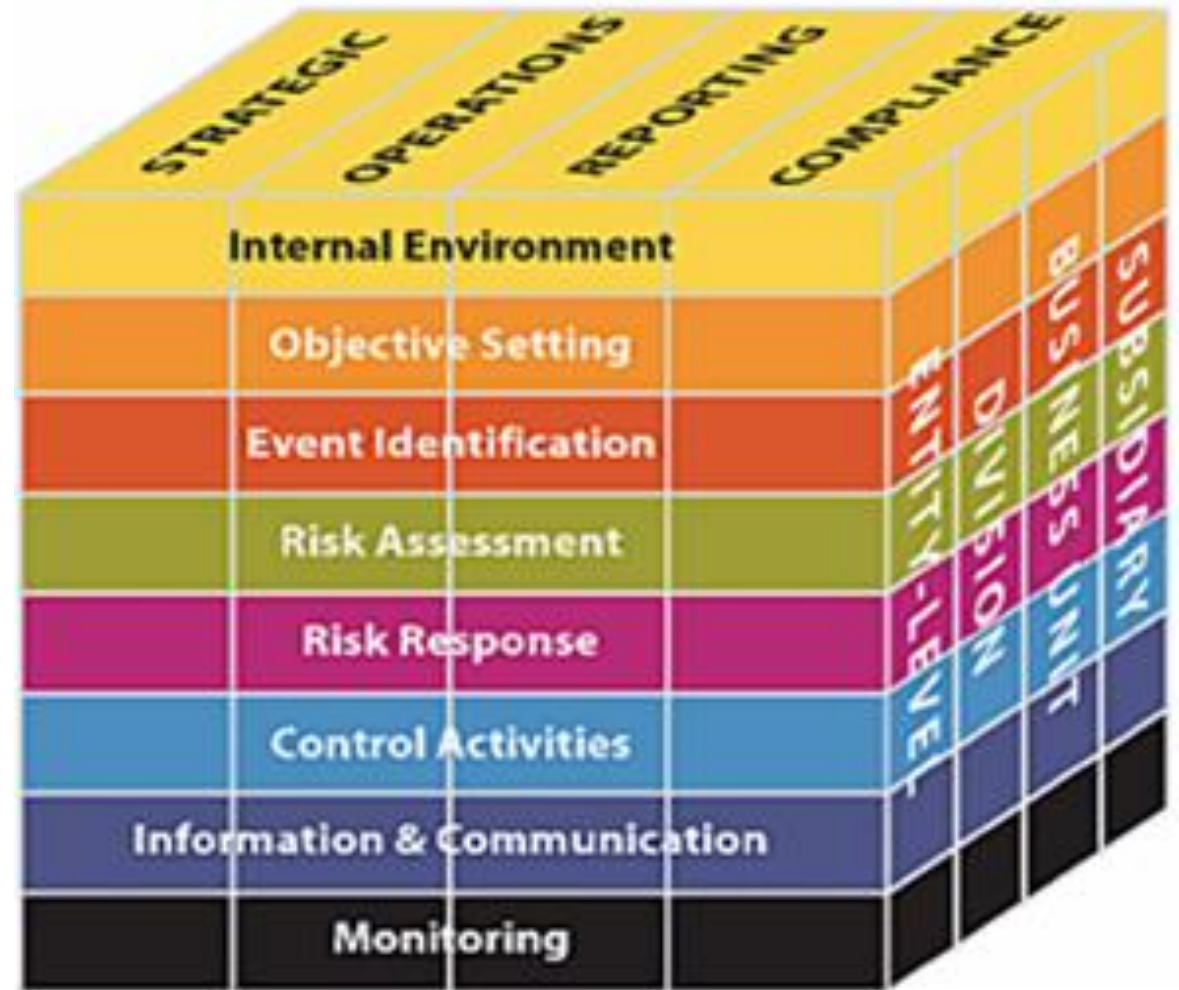
What is the impact and likelihood of risks?

How to manage risk: Share it, avoid it, reduce it, or accept it

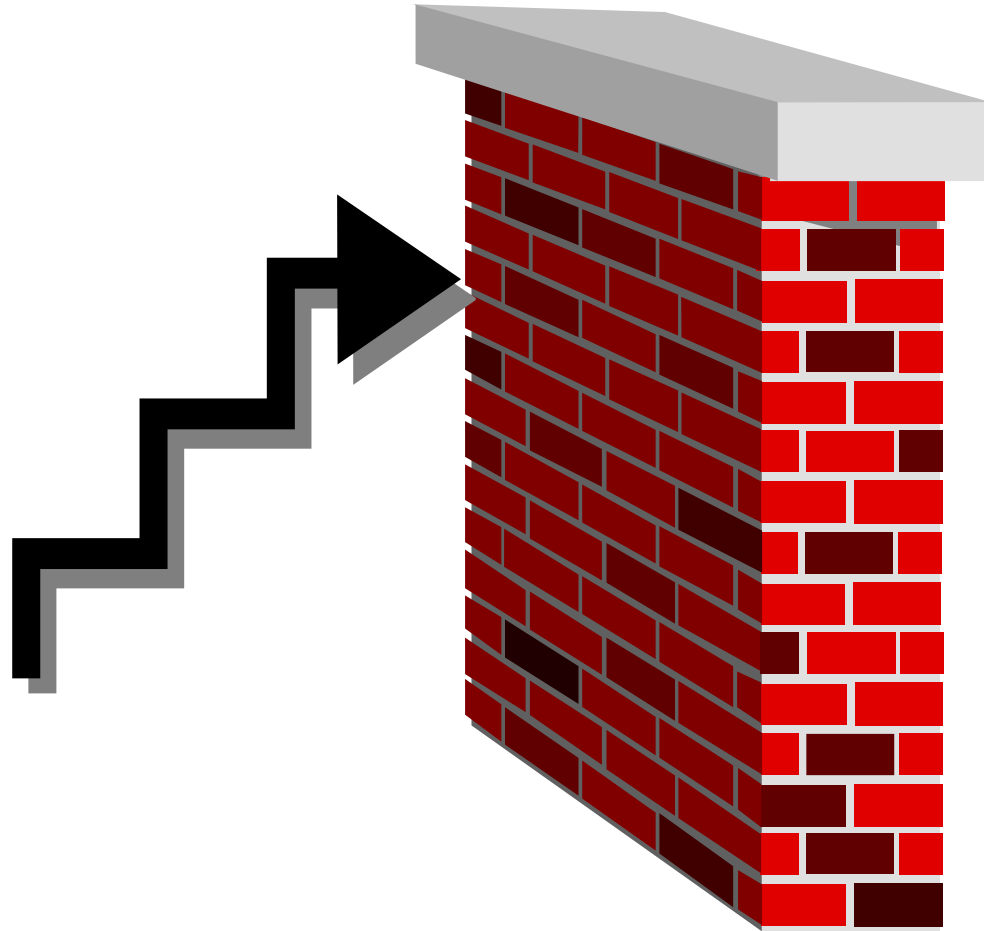
Procedures to ensure effective risk mitigation

Education & awareness of effective policies and practices

Management reviews & audit assesses



What is RISK?



Strategic Plan



Anything that could prevent the organization from meeting its goals

The background of the entire graphic is a dark blue gradient with a bright light source at the top center. On the left, there is a rectangular inset showing a fiery car crash. The main text is centered and overlaid on the blue background.

ACTION NEWS

WSB-TV·DT ATLANTA

2

COVERAGE
YOU CAN COUNT ON

[HIGH DEFINITION TELEVISION]

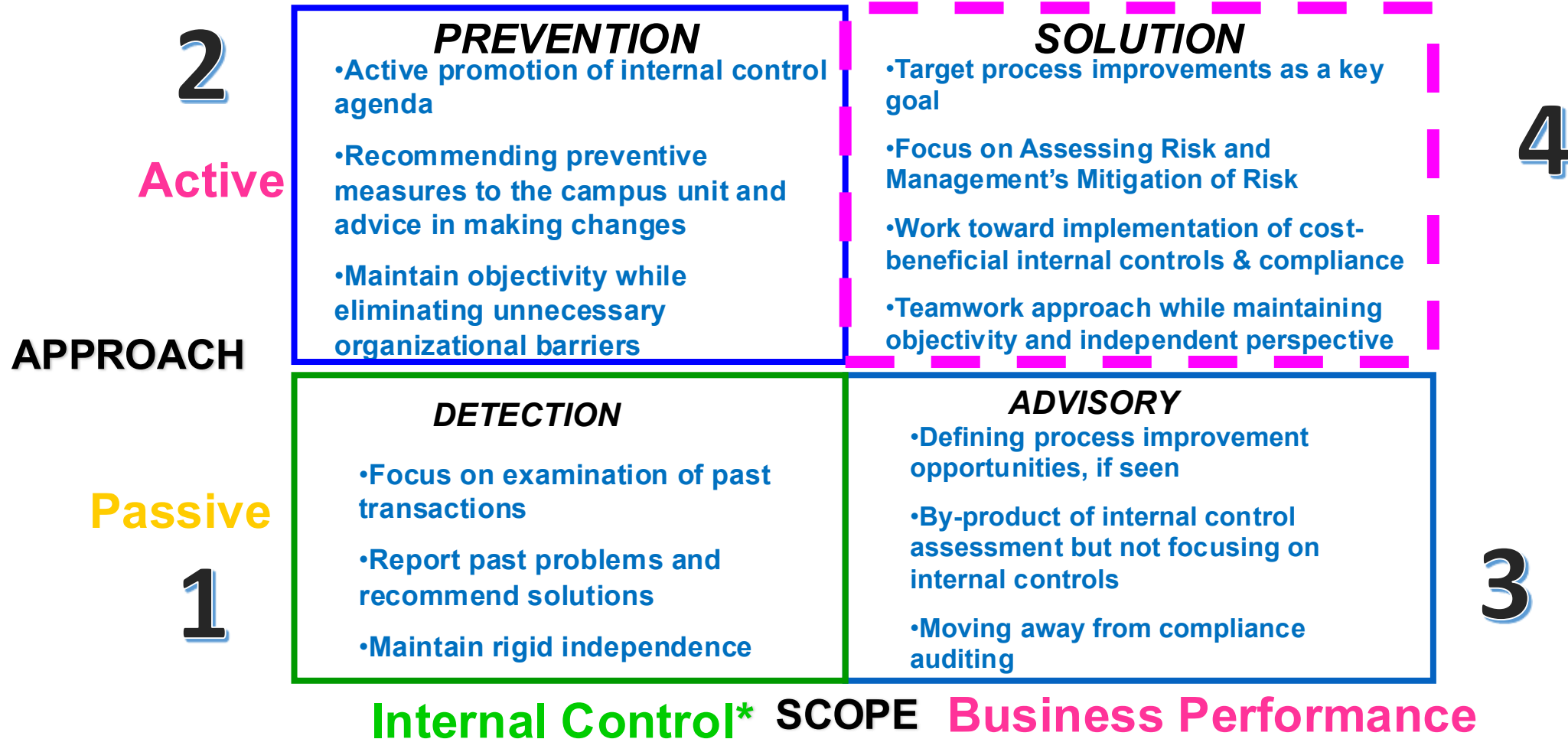
Have you read your institution's strategic plan?

- See what senior management views as most important
- Map your job responsibilities to the accomplishment of the Plan
- Better communicate the value of the services you and your department provide



Internal Audit Primary Mission

Four Potential Orientations



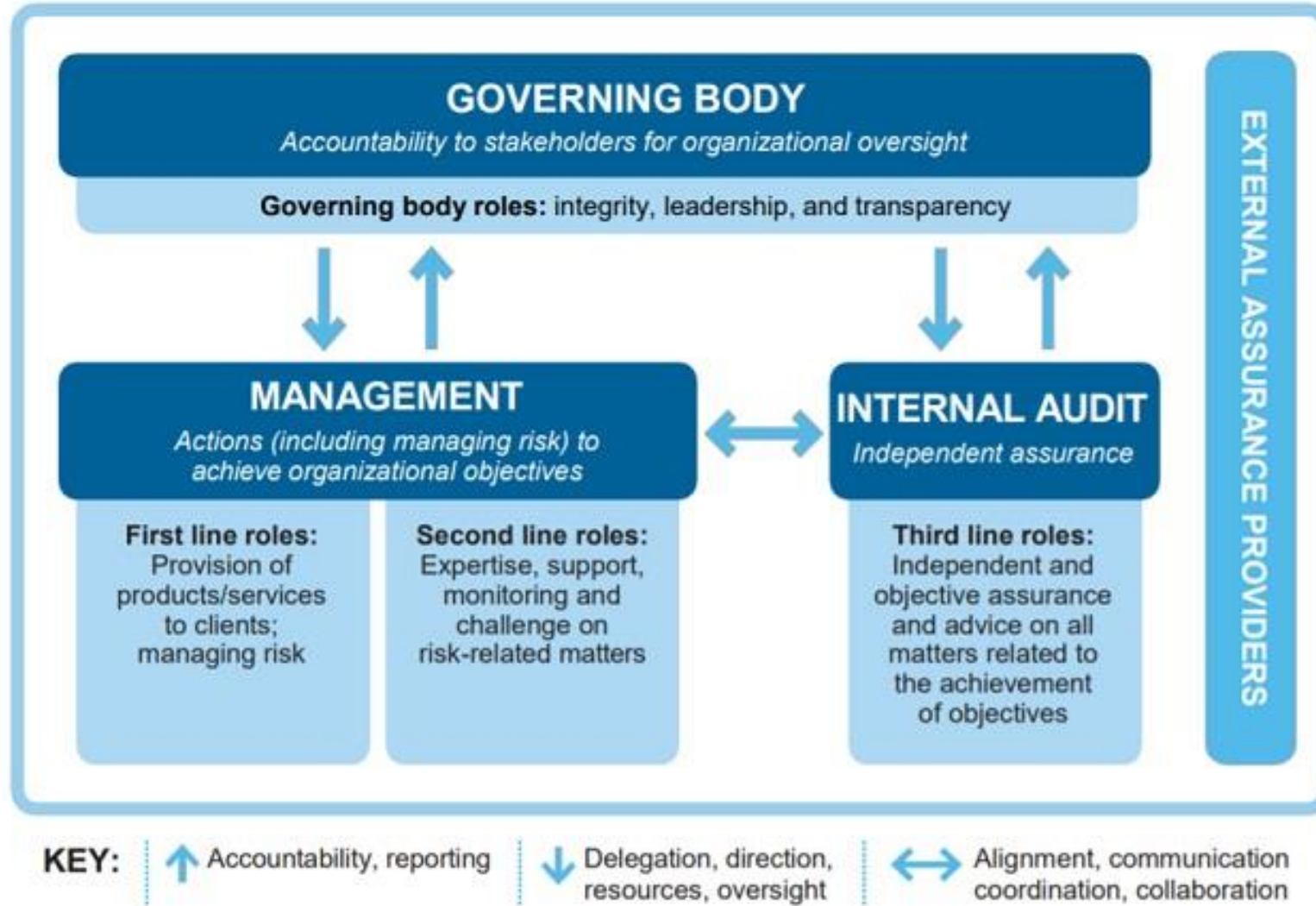
*Defined along the lines of COSO's Integrated Framework



Please fill in the survey

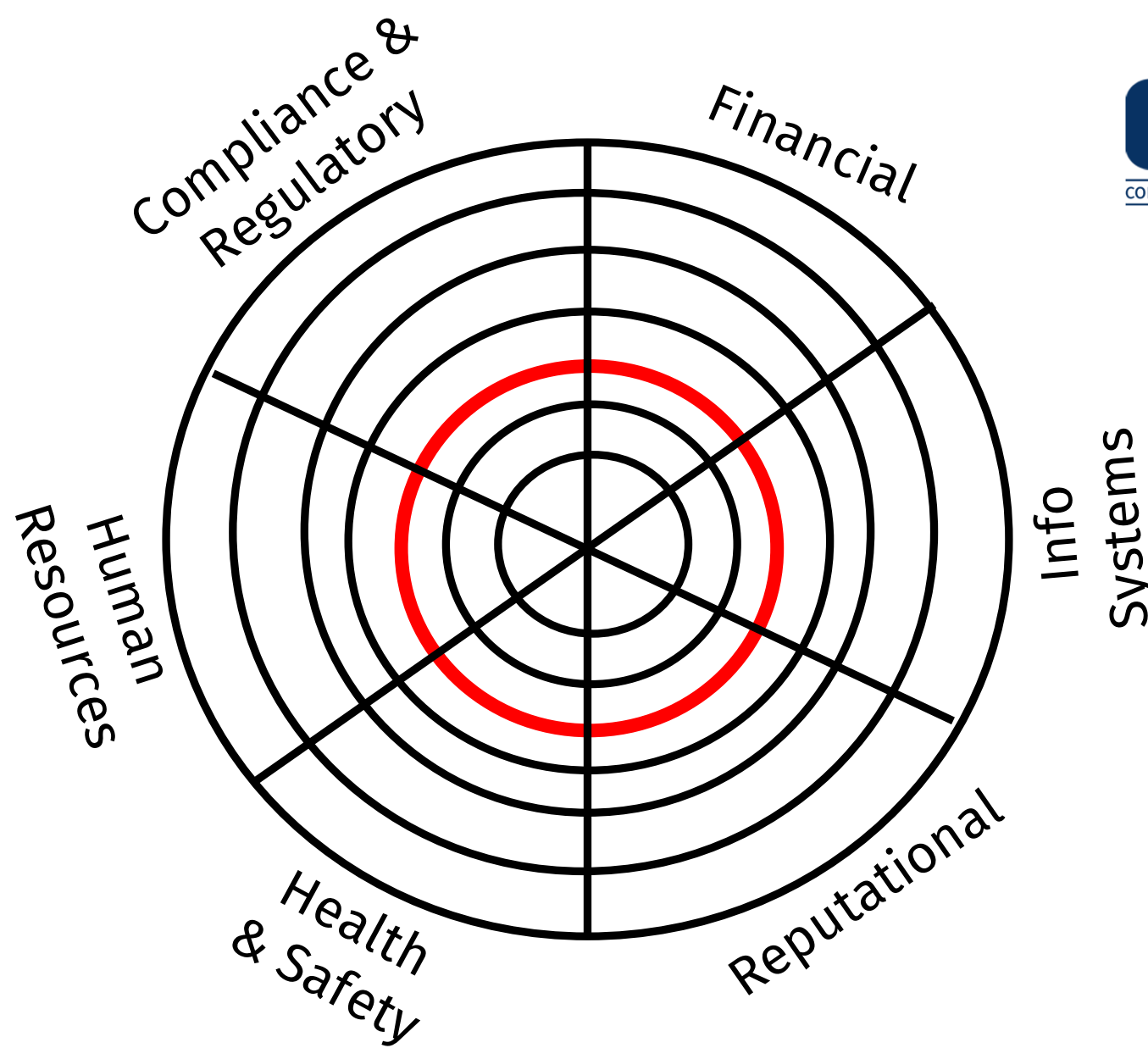


The IIA's Three Lines Model

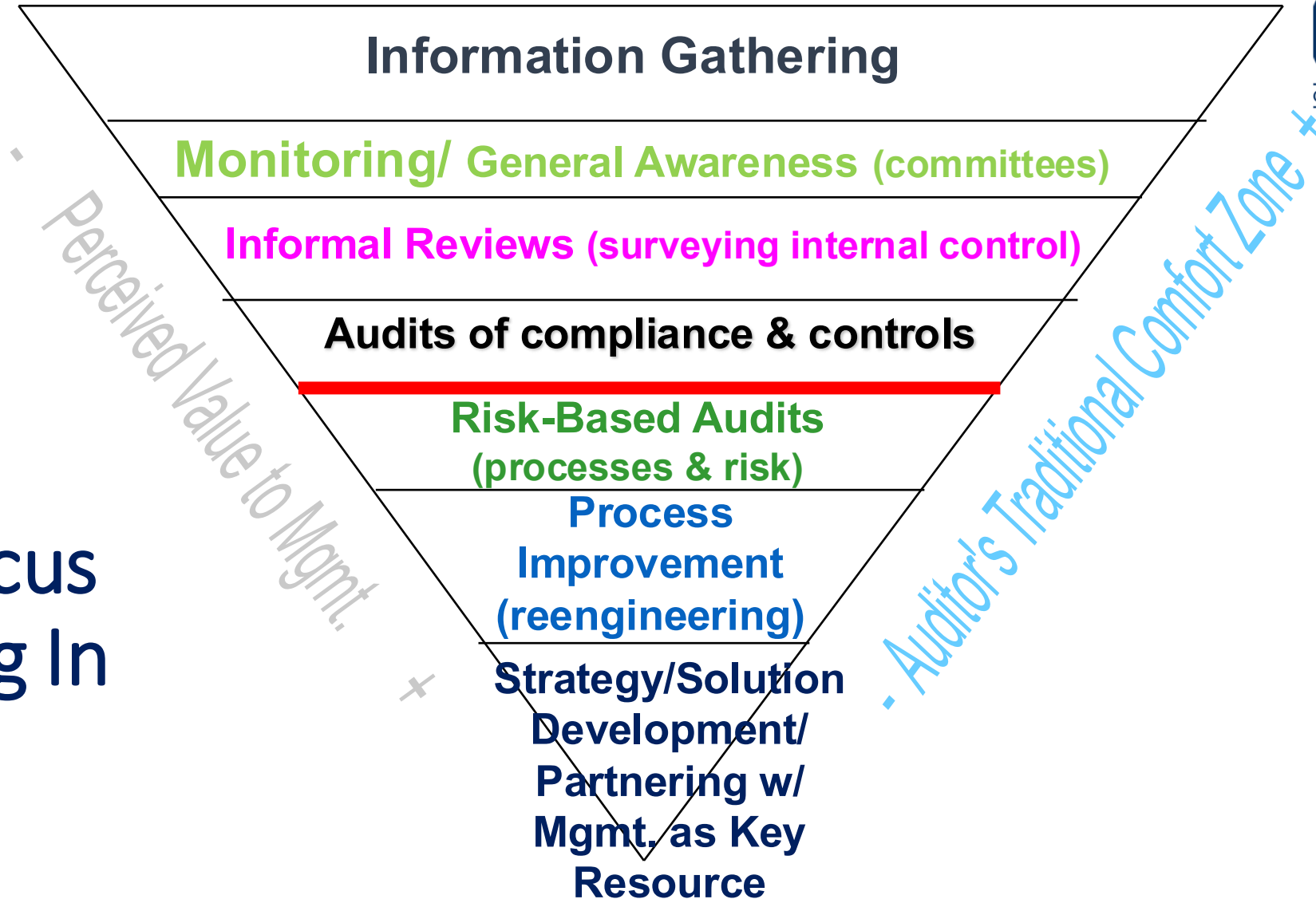


Source: Institute of Internal Auditors

Audit Risk Universe



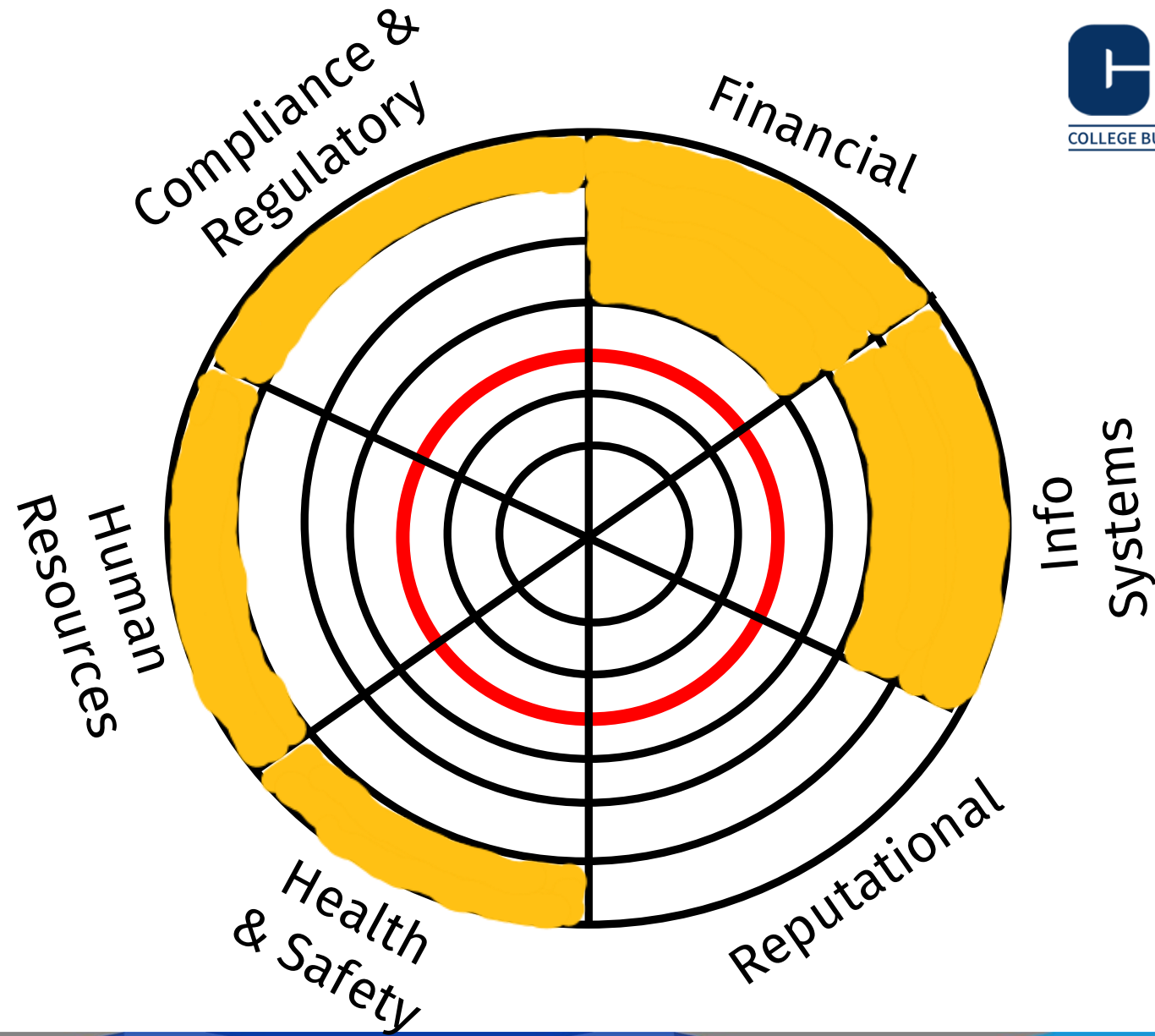
Audit Focus -- Zeroing In



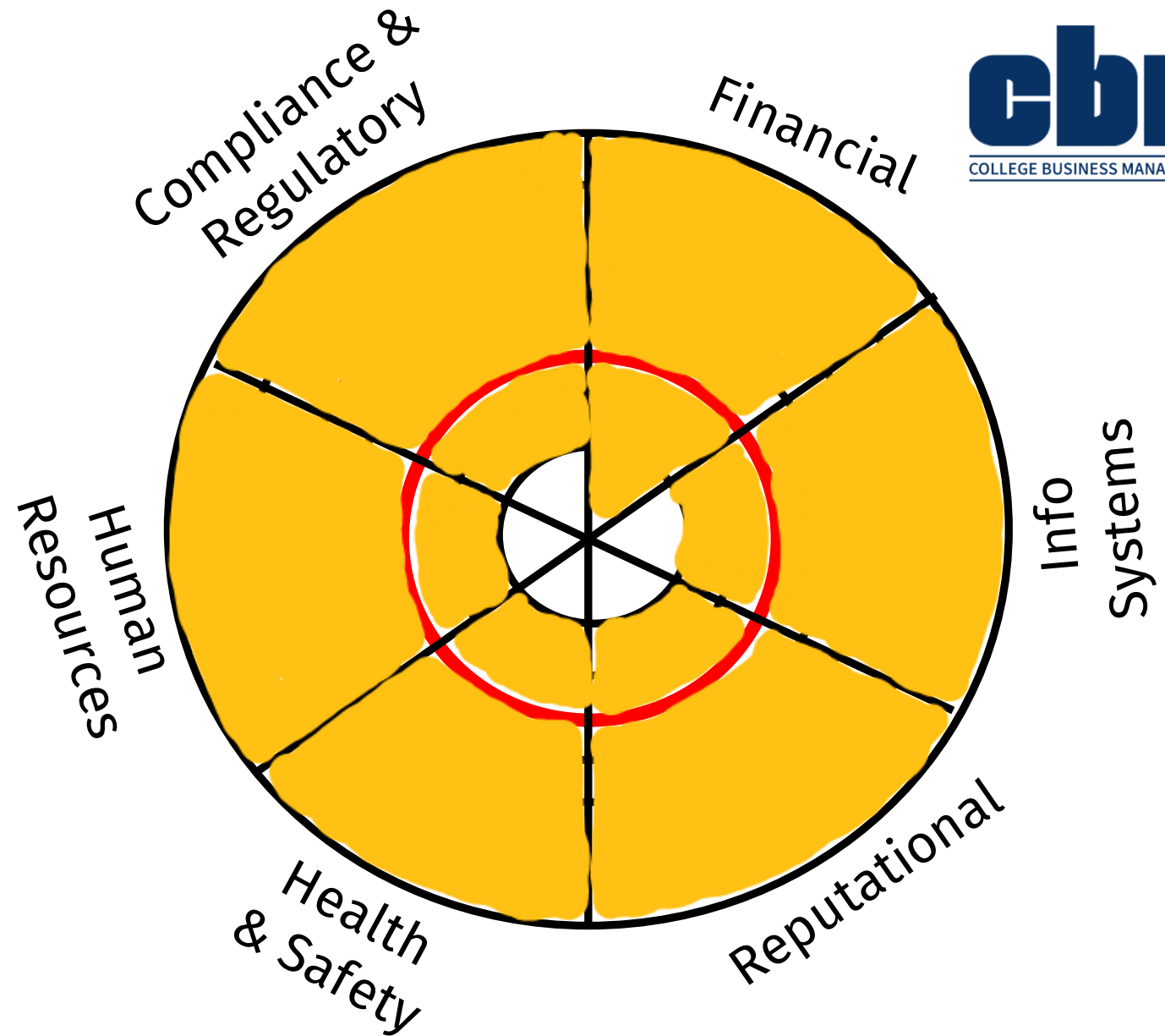
© Original Artist
Reproduction rights obtainable from
www.CartoonStock.com



Audit Risk Universe - Past Focus



Audit Risk Universe - Focus Goal



The Approach – Setting the Scope

- Talk with all members of Senior Management (one-on-one discussions)
- Talk with line-level and managers as well
- Ask key questions, such as:
- **“Where are potential exposures?”**
- **“What keeps you up at night?”**
- **“Where do you see risks for your unit and the institution?”**
- Complete worksheet to inventory the risks



Risk Assessment Discussion Tool

[illegible]

Feature films are the result
of years
of scientific study combined with the
experience of years

What is YOUR Strategy for Risk Assessment?

It'll sort itself out



Translation: If I ignore it and do nothing, then maybe the problem will go away... it won't

The Questions:

- “What are some of the potential adverse situations that could occur within...?”
- Note: We are NOT asking, “What would you like Internal Auditing to do for you?”
- Neither are we asking “What internal controls should be in place?”



Risks: Financial

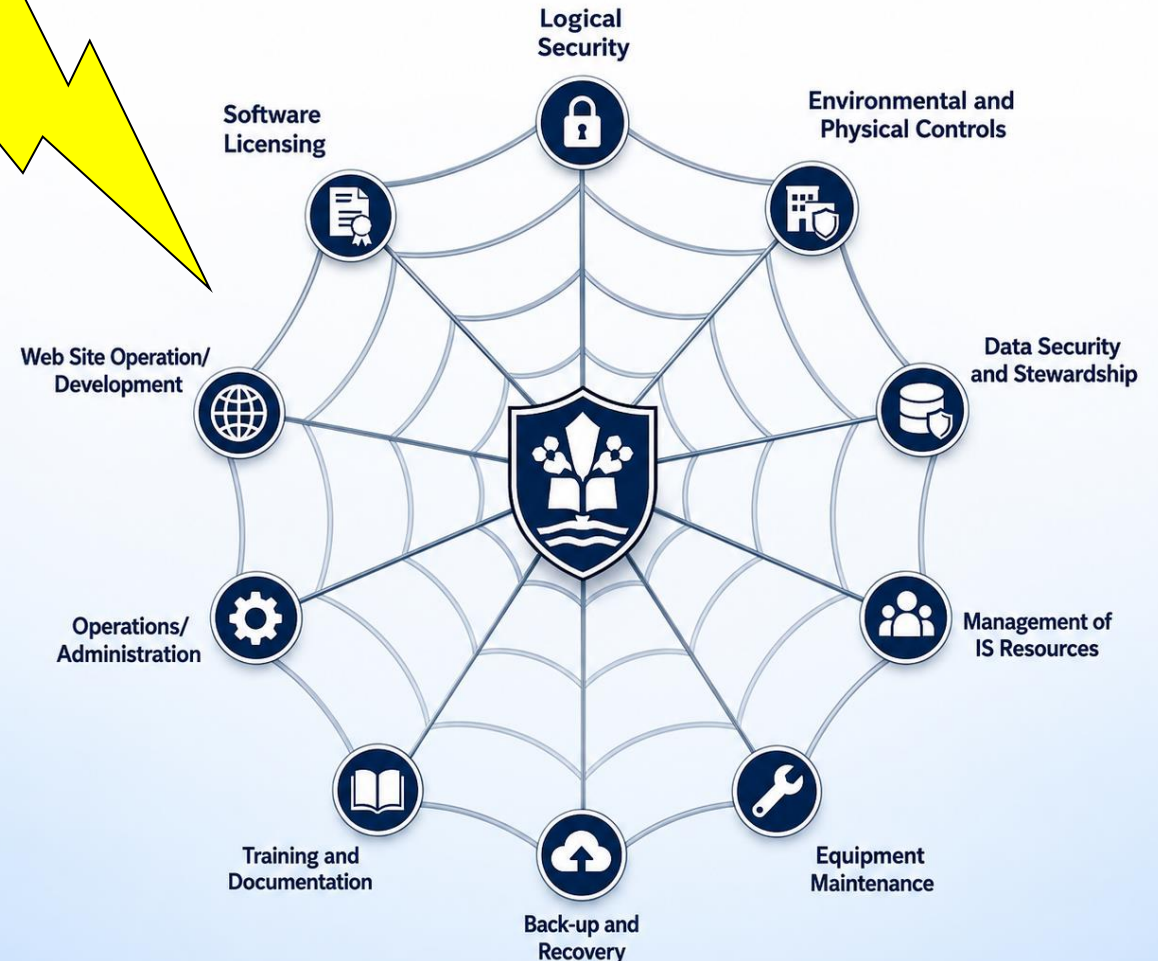
- Accuracy of records
- Sponsored programs
- Foundation funds
- Travel
- Procurement/ P-Cards
- Telecommunications
- Capital Assets
- Cash and Receivables
- Payroll
- Risk Management



Risks: Information Systems

- Logical Security
- Environmental and Physical Controls
- Data Security and Stewardship
- Management of IS Resources
- Equipment Maintenance
- Back-up and Recovery
- Training and Documentation
- Operations/ Administration
- Web Site Operation/ Development
- Software Licensing

Information System Risks



Why?

- Cybersecurity threats continue to evolve
- Cybercriminals have changed
- Higher Ed is a growing target
- Increasing number of exploits target individual users
- Greater need for awareness of risks and sound practices



THE COST OF CYBER CRIME IN 2026

Cyber crime continues to rise—driving unprecedented costs for businesses and people worldwide.

GLOBAL COST OF CYBER CRIME IN 2026

\$10.5 TRILLION



UP 15% FROM 2025 ↗

Cyber crime costs are projected to surge past \$10 trillion annually by 2026.

KEY COST DRIVERS



Rising sophistication of attacks

Attackers are using AI, automation, and advanced techniques.



Expanding attack surface

Cloud, remote work, IoT, and third-party risks increase exposure.



High impact on operations

Downtime, data loss, and regulatory penalties drive greater costs.

COST BREAKDOWN BY TYPE OF CYBER CRIME (2026)



RANSOMWARE

\$2.73T

Business disruption, ransom payments, and recovery



PHISHING & SOCIAL ENGINEERING

\$1.76T

Fraud, credential theft, and account takeover



CLOUD COMPROMISE

\$1.47T

Data breaches, service disruption, and misconfiguration



PAYMENT FRAUD & FINANCIAL CRIME

\$1.26T

Unauthorized transactions and online payment fraud



IDENTITY THEFT

\$1.12T

Account takeover, new account fraud, and identity misuse



MALWARE & VIRUSES

\$0.91T

Damage, data loss, and system recovery



BUSINESS EMAIL COMPROMISE

\$0.74T

Fraudulent wire transfers and scams



INSIDER THREATS

\$0.56T

Data theft, sabotage, and policy violations



IOT/OT & SUPPLY CHAIN ATTACKS

\$0.44T

Operational disruption and third-party risk



WEB ATTACKS

\$0.27T

DDoS, defacement, and web exploits

BY THE NUMBERS (2026)



\$4.88M

Average cost of a data breach



277 DAYS

Average time to identify and contain a breach



66%

Of organizations expect higher losses in 2026



\$1.9M

Average ransom demand

TOP 5 INDUSTRIES BY TOTAL COST (2026)



Financial Services

\$2.27T



Healthcare

\$1.56T



Manufacturing

\$1.22T



Retail

\$1.11T



Technology

\$0.97T

THE OUTLOOK

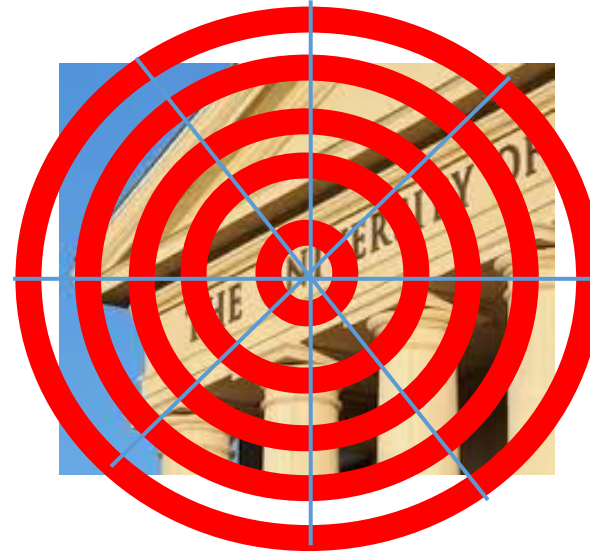


Cyber crime is a trillion-dollar challenge—but proactive security and resilience can reduce the risk.

Higher Education Growing Target

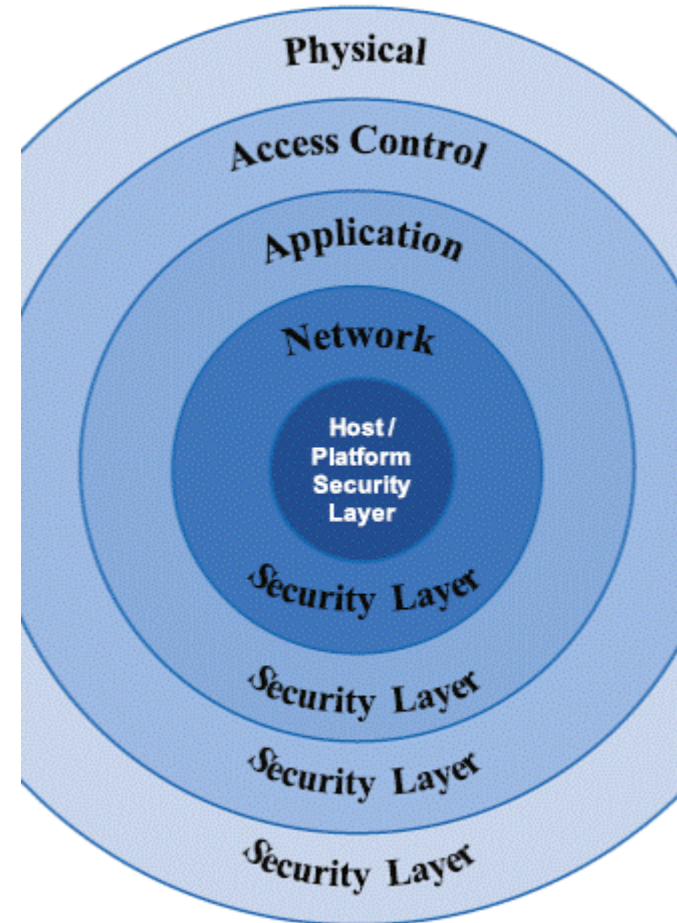
LOTS of valuable info:

- SS#, financial aid (tax returns), financial info, banking info, medical records
- Known for its “open” environment (“academic freedom”) and lax security
- Decentralized security profile
- Typically under-funded for information security



Layers to Computer Security

- Access-controlled server rooms
- Firewalls & Intrusion Prevention Systems (IPS)
- Intrusion Detection Systems (IDS)
- Multi-factor authentication
- Antivirus scanning
- File and data encryption
- Secure coding of applications
- Enterprise rights management
- User controls



Why Does This Matter To Me?

Because IT security is not just for “techie nerds”



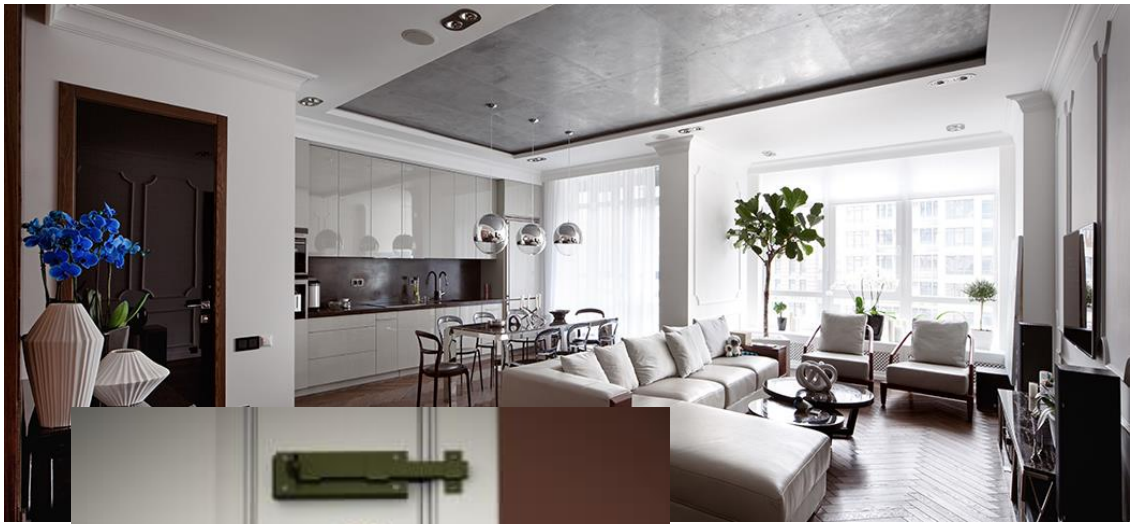
Information Security – Weakest Link:

PEBCAK



95% of cyber-attacks start with an employee being tricked







NOTICE
DO NOT PROP
DOOR OPEN
FOR ANY REASON



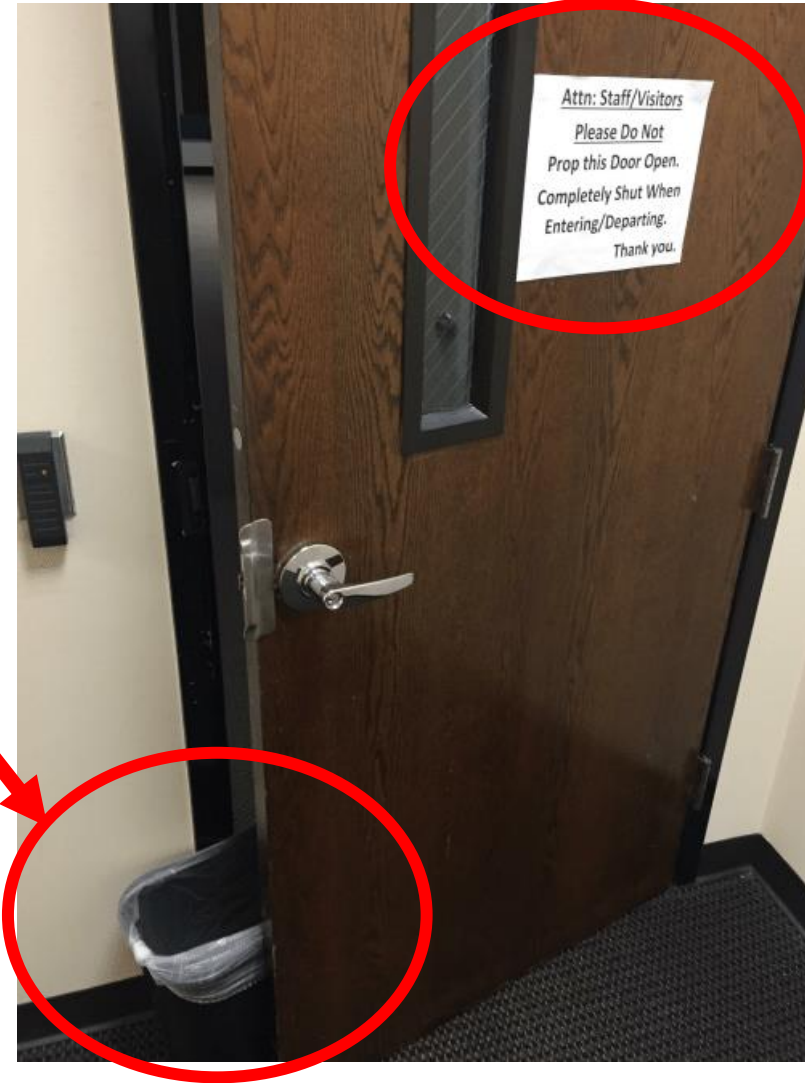


**Do not prop open
door and allow
coyotes into
sandwich shop**





**Now *everyone* in
the building is at
risk**



What are Cyber Criminals Seeking?

- Personal Identifying Information (PII)
 - Social Security Numbers
 - Credit card numbers, security codes, exp. dates
 - Birth Dates
 - Home addresses
 - Mothers' maiden names
 - Banking info
 - Intellectual Property
 - Medical records
- **Login credentials & trusted access**



What YOUR data is worth on the Dark Web



Spotify Account
\$2.75



Hulu Account
\$2.75



Netflix Account
\$1.00 - \$3.00



PayPal Credentials
\$1.50



Social Security Number
\$1.00



Driver's License
\$20.00



Credit Card
\$8.00 - \$22.00



Email Address & Password
\$0.70 - \$2.30



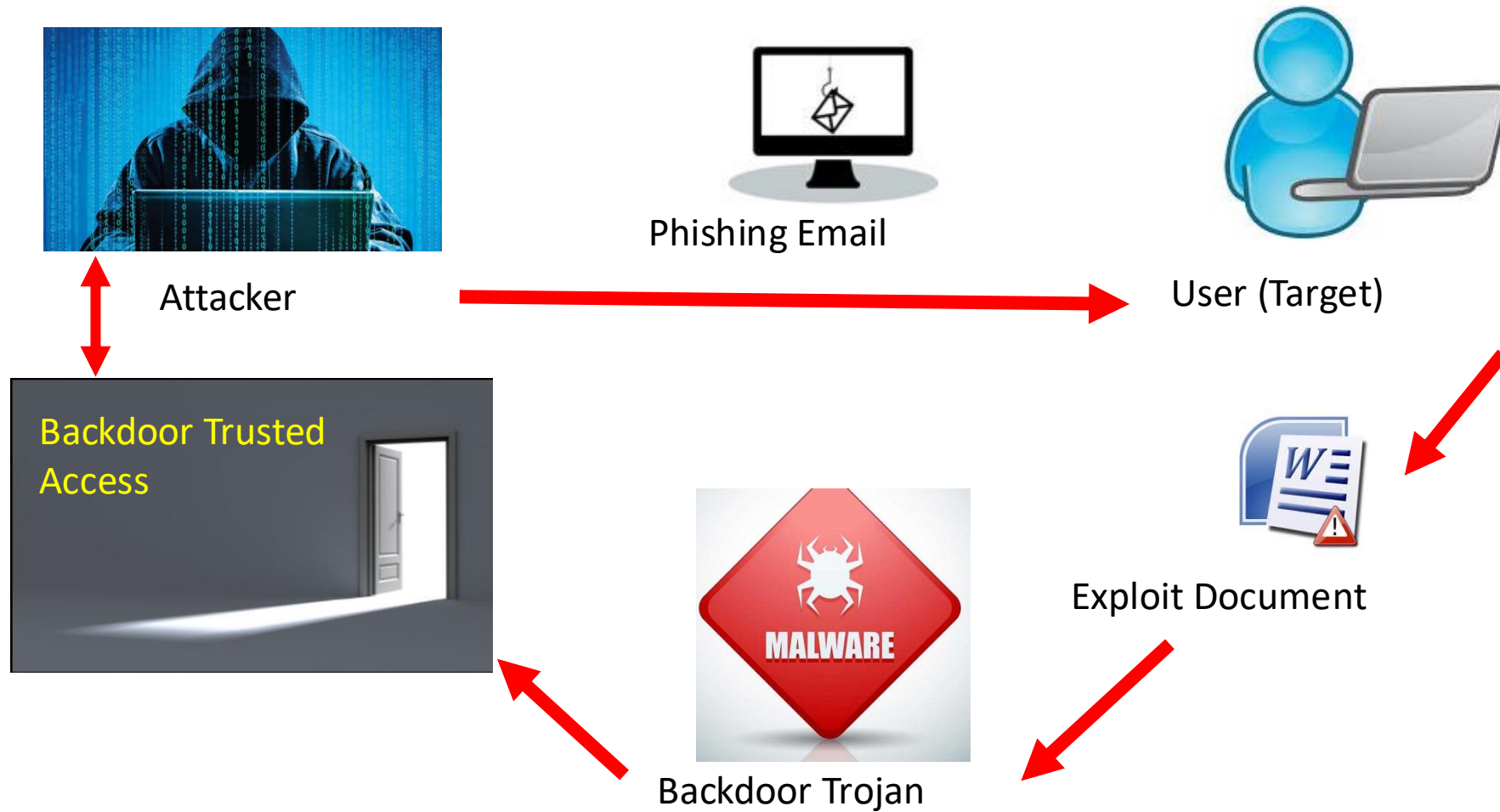
Medical Record from
Large Scale Attack
\$1.50 - \$10.00



Complete Medical Record
Up to \$1000.00

Source: Dark web market listings Markets monitored were Dream, Point and Wall Street Market. Prices collected in USD as displayed on listings. Per Top10VPN

How Do Cyber Criminals Get Your Information?



Once Backdoor Access is Gained...

- Attacker can install rootkits, bootkits, **keystroke-loggers**, anti-antivirus malware, etc.
- Most users will be unaware that their system has been compromised



How to Protect Yourself

- Regularly update your ***strong, unique*** password
- Never use same password for multiple platforms
- Treat your passwords like underwear...



- **Change** them often,
- keep them **private** (don't leave them laying around), and
- **never share** them with anyone

See my
password
on the back
side

How long does it take to use AI to crack a password?

GDPR
ISO 27001
ISO 27002

PCI DSS
NIST 800.53

DOD/CMMC

Number of Characters	Numbers Only	Lowercase Letters	Upper and Lowercase Letters	Numbers, Upper and Lowercase Letters	Numbers, Upper and Lowercase Letters, Symbols
4	Instantly	Instantly	Instantly	Instantly	Instantly
5	Instantly	Instantly	Instantly	Instantly	Instantly
6	Instantly	Instantly	Instantly	Instantly	Instantly
7	Instantly	Instantly	1 sec	2 secs	4 secs
8	Instantly	Instantly	28 secs	2 mins	5 mins
9	Instantly	3 secs	24 mins	2 hours	6 hours
10	Instantly	1 min	21 hours	5 days	2 weeks
11	Instantly	32 mins	1 month	10 months	3 years
12	1 sec	14 hours	6 years	53 years	226 years
13	5 secs	2 weeks	332 years	3k years	15k years
14	52 secs	1 year	17k years	202k years	1m years
15	9 mins	27 years	898k years	12m years	77m years
16	1 hour	713 years	46m years	779m years	5bn years
17	14 hours	18k years	2bn years	48bn years	380bn years
18	6 days	481k years	126bn years	2tn years	26tn years



Note:
It takes AI 6 days to crack an 18-character numbers-only password. Add an uppercase and lowercase letter, and it'll take AI 26 trillion years! Once you get above 16 characters, it is much harder for AI to run through all the password combos, so the longer the password, the better.

Source: Hive Systems

How long should your password be?



We laugh – but she was trying...

During a recent password audit by a company, it was found that an employee was using the following password:

“MickeyMinniePlutoHueyLouieDeweyDonaldGoofy1Sacramento”

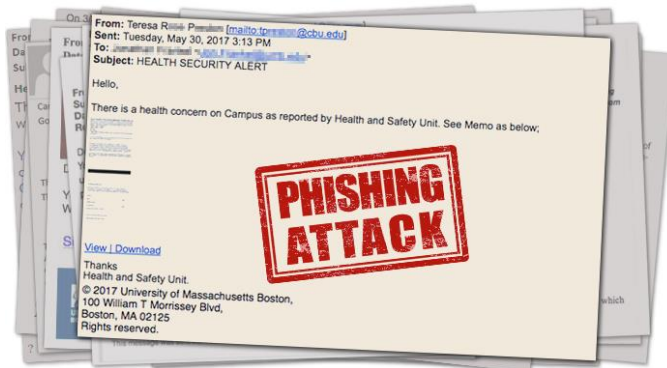
When asked why she had such a long password, she rolled her eyes and said, “Hello! I was told it had to be at least 8 characters and include at least one number and a capital.”

Ways to Spot Phishing Schemes



1) Double check the **origin** of an email before opening or acting or responding.

- Email addresses can be spoofed. ***Look for unusual domains*** (e.g., example.com.hk)
- ***Sense of urgency?*** Criminals are looking to have you respond quickly.
- Body of message and signature: ***generic or personalized?*** Customary to what you would expect from sender?



Extremely Urgent: Final attempt to contact you...this is time sensitive



Heather <patricia@mshmoss.com>

Sep 14, 2015, 3:15 PM

to: [REDACTED]@gmail.com" <[REDACTED]@gmail.com>

What would you say if I told you the government owed you up to \$5,775 cash to go to school? Well, they DO and all you have to do is pick a school, pick a subject and claim it!

- THIS IS NOT A LOAN, you will never have to pay this back
- Online classes are available

Take this SERIOUSLY, Soon This Program Will Close Until Next Year. Click below to take the two-minute questionnaire and start the approval process...

[Click Here To Let Us Know If You'd Prefer Check Or Direct Deposit](#)

Example #4:

The content of the message makes promises, often about large sums of money that seem "too good to be true." This example also attempts to collect personal banking information and uses a spoofed email address.

PO box 105603
Atlanta, GA 30348-5603

You are receiving this message as we respect your privacy. We hope you find these communications valuable; however, if you would prefer to no longer receive emails from us, please click [here](#).

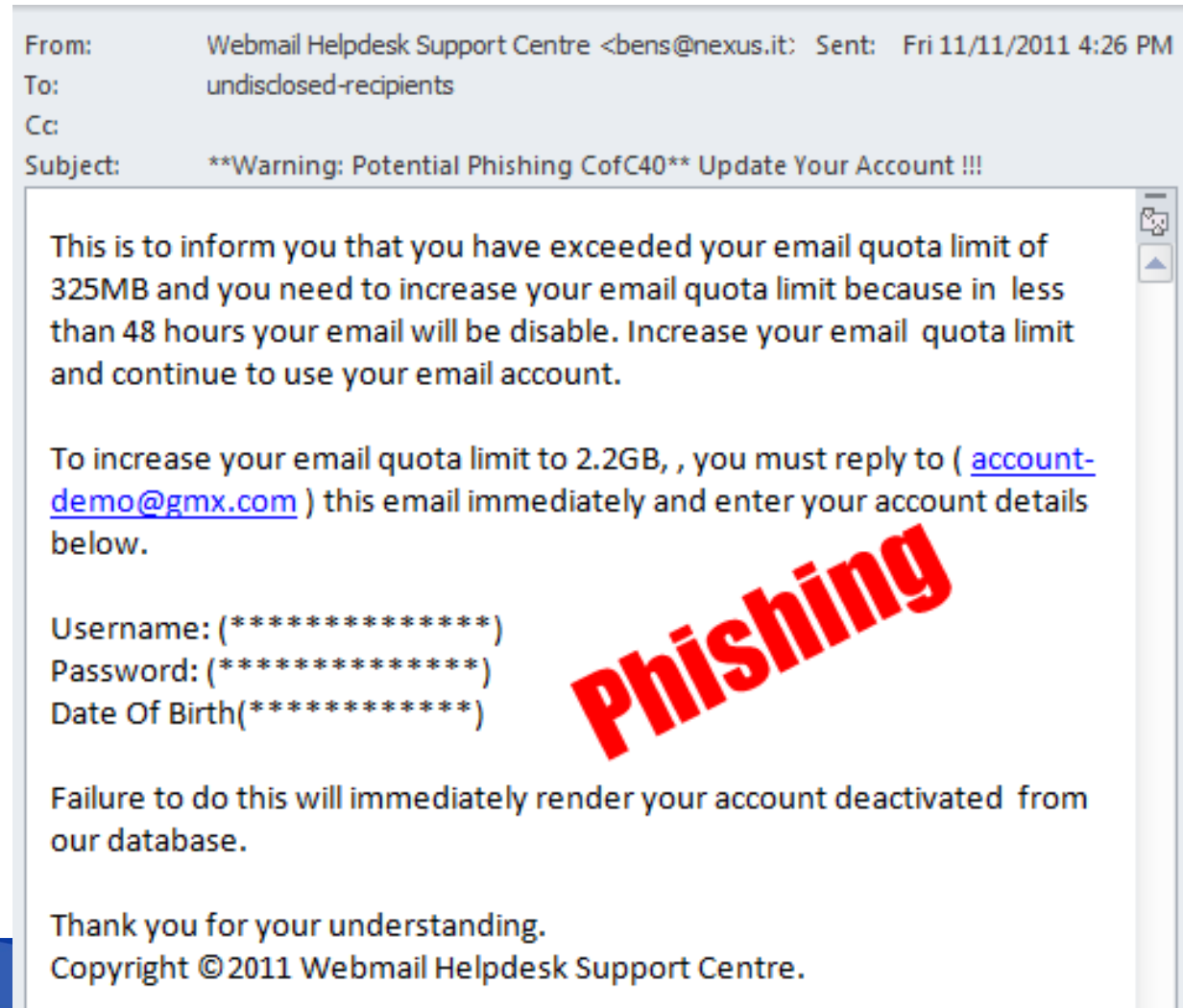
What to look for in email (cont.)

- Content – asking you to ***open a file*** or go to a ***website link***?
- ***Hover*** mouse over link (**DO NOT CLICK**... just ***hover***). It should show the actual link.



2) Never share personal identifiable information via email

- Legitimate emails will never ask you to share sensitive PII. Most phishing emails are bait to see if you will.



3) Never use login forms embedded in emails

- Instead, access the organization's webpage directly from your browser.
- If you receive a **call** (“**Vishing**”), ask for a call-back number and verify that against known numbers



Double and triple check URL before filling out ANY form



Example of a Non-Georgia Tech Domain

Should be https:// not http://



Webmail Login

GT Account:

Password:

☐ Remember my account on this machine and browser.
[Why to be careful using this feature](#)

Webmail client:

OIT will never ask you to "Validate" your account.

4) Check legitimacy of email

Legitimate companies are less likely to use public email providers like Yahoo, Gmail, Hotmail, Outlook, etc.

YAHOO!

Gmail



Hotmail®

Outlook

What to do when you receive a spurious email?

- **DO NOT CLICK ON ANY LINK** or download any attachment!
- Alert IT Department
- ***SHIFT-DELETE*** (permanently delete email)

Stop! Don't click that link!



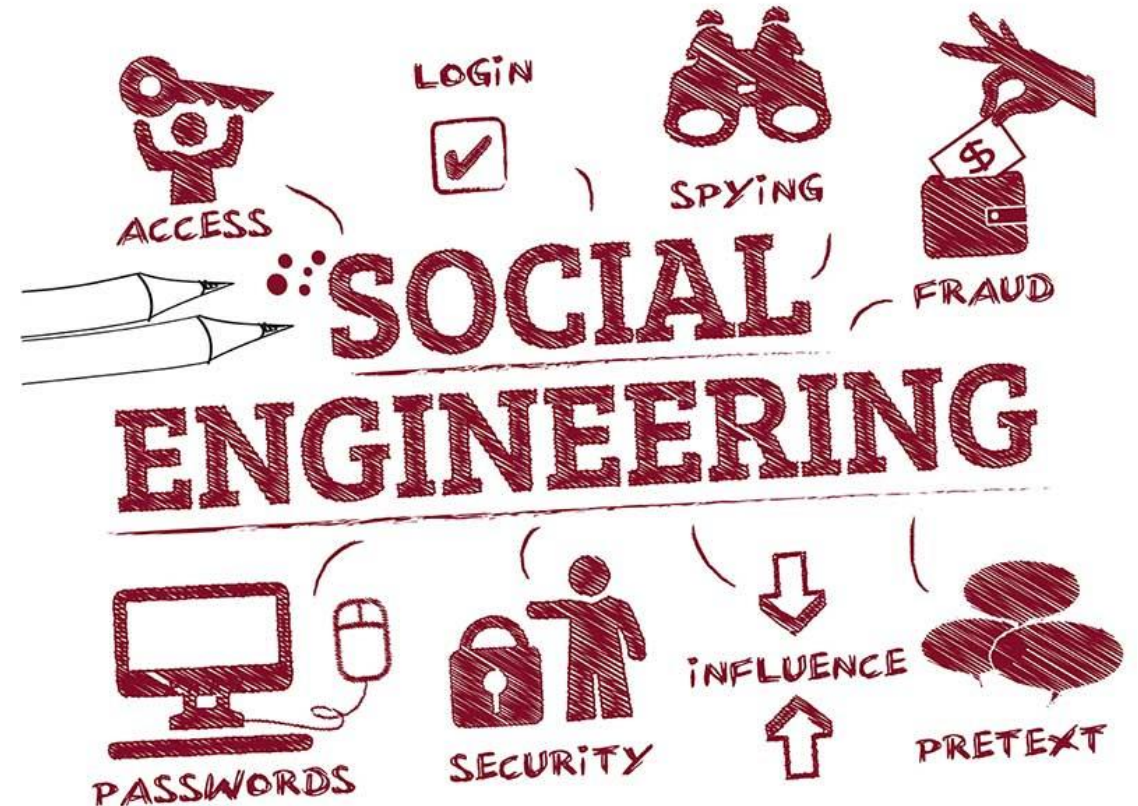
Other IT Security Effective Practices

- Develop clear computer use policies for employees and 3rd party vendors
- Restrict users from having administrator access
- Review user access in each dept. to ensure “need-to-know” for each user
- Regularly update system software and antivirus software (don’t forget other devices, e.g., printers, routers, etc.)
- Ensure against software piracy in dept.
- Back up data and store securely

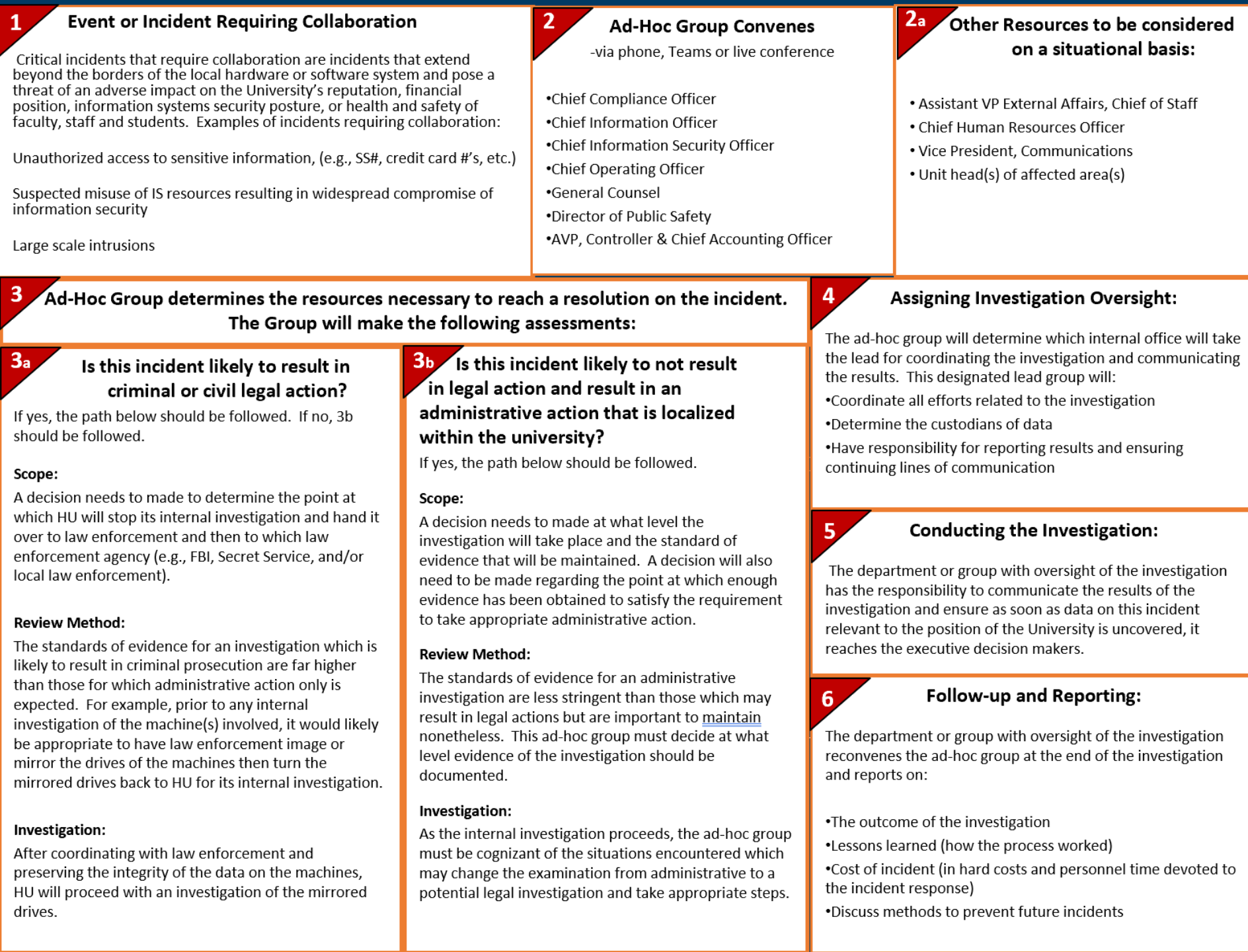


Other IT Security Effective Practices (cont.)

- Use end-to-end encryption to access or send any sensitive data (e.g., VPN)
- Beware of social engineering (be prudent about what information you share on social media)
- Develop incident-response plan



Incident Response Model



Other IT Security Effective Practices (cont.)

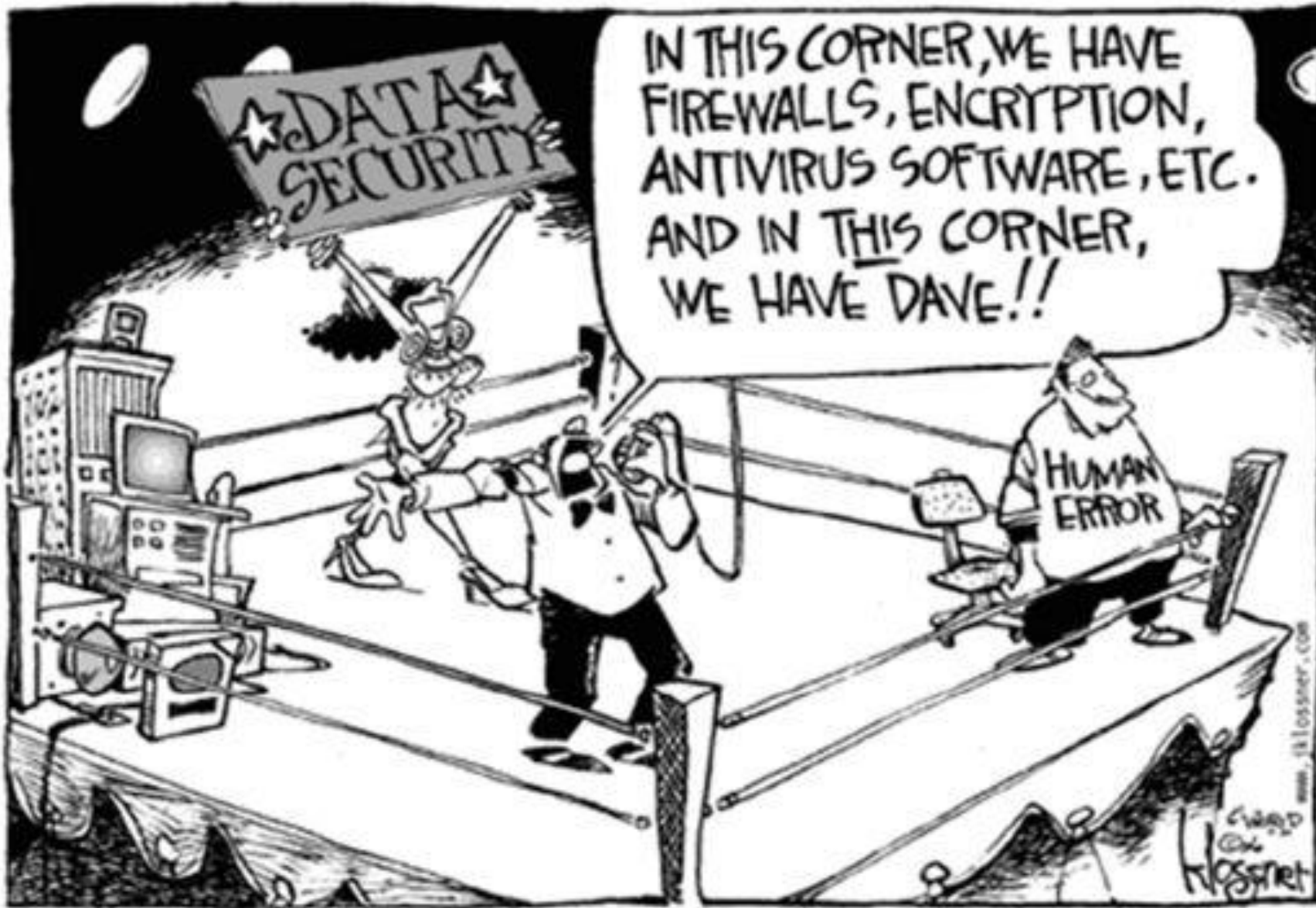
- Develop **business continuity plan** for each unit
- TEST each unit's ability to implement business continuity



Other IT Security Effective Practices (cont.)

- Educate and train ALL employees and ***HOLD ACCOUNTABLE***
- ***MONITOR*** to ensure compliance





Don't become the weakest link...

... to avoid the IT department assigning you an error code:

“ID – 10 –T”

IDIOT



IT Security...

... is **EVERYBODY'S** responsibility





Risks: Human Resources

- Appropriate hiring (EEOC)
- Leave Reporting
- Sexual Harassment Awareness
- Employment Eligibility Verification
- Consultant or Employee?
- Annual Performance Evaluations
- Off campus assignments
- Non-standard work assignments



Risks: Health & Safety

- Safety of Workplace
- Hazardous Materials
- Biological Safety
- Chemical Safety
- Hazardous Equipment
- Emergency Plans
- Training



Risks: Legal & Regulatory

- Who is authorized to contract on behalf of the university?
- Policy on receipt of Gifts
- Awareness of Open Records Act requirements



The Audit Plan

- Focus on reviewing how each organization is moving toward effectively and efficiently **managing** each of the risks
- Independent verifications & attestations to determine strength of processes
- Conclusions are forward-looking - **how well positioned are they to deal with risk ?**



Summary of Observations and Opportunities for Improvement – Howard University School of ABC (HUABC)

This departmental review covers controls and procedures related to various operational areas within HUABC. The Office of Audit & Compliance (OAC) testing scope covered from **August 1, 2021, to September 30, 2023**. Our assessment work occurred from September 2023 until January 2026 and identified 22 opportunities for improvement that impact the management of risks related to HUABC controls and procedures.

The individual observations contributing to each overall observation noted to the right along with management recommendations are detailed in slides 2 – 5. Each individual observation is given one of the ratings noted below.

Rating	OAC Rating Description
	Green: Low Risk. Strong controls in place with limited to no further opportunity for improvement.
	Light Green: Medium-low Risk. Reasonable controls in place. There may be minor opportunities for business process enhancement and control improvement.
	Yellow: Medium Risk. Opportunity for improvement. A vulnerability in internal controls or business processes that requires attention.
	Orange: Medium-high Risk. Opportunity for moderate improvement. Ineffective design and/or inconsistent application of the framework of governance and controls. Senior management attention is recommended, and operating management action is required.
	Red: High Risk. Opportunity for significant improvement. Weaknesses in the process that present risk exposure to unit/University. Senior management attention is required.

TABLE OF CONTENTS AND SUMMARY

AREA OF RISK MITIGATION	Low Risk	Medium-low Risk	Medium Risk	Medium High	High Risk	Page
EXECUTIVE SUMMARY						
FISCAL – Policies, Procedures, Training						2
Accuracy of Financial Records						3
Payroll Processing						4
Procurement						5
Procurement Card						6
Travel						7
Sponsored Programs						8
Tuition Remission						9
HR– Policies, Procedures, Training						10
Hiring/Onboarding process						11
Consultants vs. Employees						12
Compliance with EEOA & Title IX						13
Performance Evaluations						14
Conflict of Interest						15
Bison One Card						16
Student Time Reporting						17
IT – Policies, Procedures, Training						18
Business Continuity of Info Systems						19
Physical and Environmental Controls						20
Website Operation						21
STUDENTS- Policies, Procedures, Training						22
Accommodations for Disabilities						23
Exam Accommodations						24
Final Exam Schedule & Administrative						25
Exam Administration						26
Grievances						27
Grade Changes						28
Withdrawals						29
Structural Analysis						30
Protection of Information						31

Results of Audit Approach



- Senior Management had a direct hand in identifying key areas of risk and setting the scope of reviews... = **“BUY-IN”**
- Audit Plan & Program seen as **“valuable,” “useful,” “on-target,” “focusing on what matters”**
- **Action Plan** becomes a **“Management Tool”** not just an audit report
- Guiding the organization in developing a plan to manage its risks
- Lead to centralized policy improvements

[illegible]

If you suspect fraud, waste, abuse...

- Contact Internal Auditing
- Contact Hotline
- Report it



What NOT to do...

CM, CVVD

CIA, CISA, CCEP, CBM, CVP

POB CLANK' JH

Next Steps

- Read & align with your strategic plan
- Assess the risks & “audit” your own unit
 - With your team!
 - What adverse situations could occur?
 - What would the impact be?
 - What’s the likelihood that could occur?
- Ensure there are mitigation strategies in place
- Monitor, monitor, monitor



Be a Risk Champion



CPE Credit Code

RobClarkSpeaking@gmail.com

770.815.7922

[linkedin.com/in/robclarkjr/](https://www.linkedin.com/in/robclarkjr/)

www.RobClarkJr.com

