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**FW: SAO - Statewide Single Audit Prior Year Finding Follow-Up: Sam Houston State University**

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**From** Valerie Bogan <Valerie.Bogan@sao.texas.gov>

**Date** Wed 1/29/2025 2:50 PM

**To** Wilson, Amy <fao.wilson@shsu.edu>

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**From:** Valerie Bogan

**Sent:** Monday, December 9, 2024 3:08 PM

**To:** 'krennee@shsu.edu' <krennee@shsu.edu>; 'Wilson, Amy' <fao.wilson@shsu.edu>; 'fao.namken@shsu.edu' <fao.namken@shsu.edu>; 'mld072@shsu.edu' <mld072@shsu.edu>

**Cc:** Brandy Corbin <Brandy.Corbin@sao.texas.gov>; Tony White <Tony.White@sao.texas.gov>

**Subject:** RE: SAO - Statewide Single Audit Prior Year Finding Follow-Up: Sam Houston State University

Good afternoon,

We have completed our follow-up work for the prior-year findings related to the Student Financial Assistance Cluster at Sam Houston State University. For the following findings, we determined that corrective action was not fully implemented; therefore, these findings will have a status of "Partially Implemented" in the audit report.

- **2023-106: General Controls**
- **2023-107: Eligibility**
- **2023-108: Special Tests and Provisions – Return of Title IV Funds**

We will request updated corrective action plans for any findings that will be reissued ("Partially Implemented"). We plan to send this request in December before the report is released in February.

Thank you for your assistance throughout the follow-up process this year. Please let us know if you have any questions.

Thank you,



Valerie W. Bogan, CFE

Managing Senior Auditor

512-936-9492

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**From:** Tony White <[Tony.White@sao.texas.gov](mailto:Tony.White@sao.texas.gov)>

**Sent:** Wednesday, May 8, 2024 1:19 PM

**To:** 'krennee@shsu.edu' <[krennee@shsu.edu](mailto:krennee@shsu.edu)>; 'Wilson, Amy' <[fao.wilson@shsu.edu](mailto:fao.wilson@shsu.edu)>; 'fao.namken@shsu.edu' <[fao.namken@shsu.edu](mailto:fao.namken@shsu.edu)>; 'mld072@shsu.edu' <[mld072@shsu.edu](mailto:mld072@shsu.edu)>

**Cc:** Valerie Bogan <[Valerie.Bogan@sao.texas.gov](mailto:Valerie.Bogan@sao.texas.gov)>; Brandy Corbin <[Brandy.Corbin@sao.texas.gov](mailto:Brandy.Corbin@sao.texas.gov)>

**Subject:** SAO - Statewide Single Audit Prior Year Finding Follow-Up: Sam Houston State University

Good afternoon,

The State Auditor's Office is currently conducting the Fiscal Year 2024 Statewide Single Audit, and an engagement letter was sent to your institution March 8<sup>th</sup>. As part of this audit, we are required to follow up on any outstanding prior year findings to determine if corrective action has been implemented, per Title 2, U.S. Code of Federal Regulations, Part 200, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards.

Findings to be followed up on:

- 2023-106: General Controls
- 2023-107: Eligibility
- 2023-108: Return of Title IV Funds

Please provide us with the current implementation status of corrective action for each finding in the box(es) at the end of the attached forms labeled "Information to be completed by Institution" by **Friday, May 17<sup>th</sup>** (if additional time is required, please let us know). Auditors will review if corrective action has been implemented, and sufficient data is available to perform follow-up testing. If both those conditions have been met, we will contact you to obtain data required to complete follow-up testing this year. Please let us know if you have any questions at all.

Thank you,

Tony White – State Auditor's Office

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# **Sam Houston State University**

*A Member of The Texas State University System*

## **FINANCIAL AID & SCHOLARSHIPS OFFICE**

**Sam Houston State University**

Reference No. 2023-106

### **Management's Response**

#### **Views of Responsible Officials 2023:**

The University acknowledges and agrees with the finding. Through analysis of the exceptions identified in the audit, the University will work to develop and implement corrective action to further improve the processes.

#### **Corrective Action Plan 2023:**

The user access has been limited to their specific job function. The university will verify user access was appropriately updated/removed. Access review procedures will be reviewed to ensure access is appropriately assigned in the future.

To streamline and assure a consistent outcome regarding the approvals for security patches to be introduced to the production environment, the University will convert these normal changes to standard changes. A standard change is "A pre-authorized change that is low risk, relatively common and follows a procedure or work instruction. (ITIL v4 definition.)" Software patching and updates are standard change candidates. Not applying security patches in a timely manner introduces a greater risk to the University than processing these requests as a normal change.

A standard change is pre-authorized and will address how IT is testing and/or validating whether the OS patches were successful in an available test environment prior to deployment to production. Test procedures will be documented as a requirement of the Standard Change Model. IT will document that outcome of the testing and/or validating of the OS patch as a Journal entry on the Standard Change prior to implementation.

The Change Advisory Board (CAB) will review these changes/procedures on a regular basis to ensure we are in compliance. Policies, Standards and Procedures will be updated to meet any required changes.



# **Sam Houston State University**

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## **FINANCIAL AID & SCHOLARSHIPS OFFICE**

### **Views of Responsible Officials 2024:**

Testing occurred prior to the prior year's corrective action plan being fully implemented. As a result, the institution accepts the continued finding.

### **Corrective Action Plan 2024:**

Corrective Action Plan continues from 2023:

The user access has been limited to their specific job function. The university will verify user access was appropriately updated/removed. Access review procedures will be reviewed to ensure access is appropriately assigned in the future.

To streamline and assure a consistent outcome regarding the approvals for security patches to be introduced to the production environment, the University will convert these normal changes to standard changes. A standard change is "A pre-authorized change that is low risk, relatively common and follows a procedure or work instruction. (ITIL v4 definition.)" Software patching and updates are standard change candidates. Not applying security patches in a timely manner introduces a greater risk to the University than processing these requests as a normal change.

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The Change Advisory Board (CAB) will review these changes/procedures on a regular basis to ensure we are in compliance. Policies, Standards and Procedures will be updated to meet any required changes.

Implementation Date: January 2025

Responsible Person: Steven Frey, Chief Information Security Officer

Amy Wilson, Director of Financial Aid and Scholarships