



Board of Trustees Audit & Compliance Committee

Friday, August 22, 2025

Microsoft Teams Virtual Meeting

Trustees: Sandra Callahan, Chair; Charbel Barakat, Oscar Horton, Lauran Monbarren

A G E N D A

- I. Call to Order and Comments Chair Sandra Callahan
- II. Public Comments Subject to USF Procedure Chair Callahan
- III. New Business – Action Items
 - a. [Approval of May 20, 2025, Meeting Note](#) Chair Callahan
 - b. [Approval to Submit Foreign Influence Annual Report](#) Chief Compliance Officer,
Dr. Caroline Fultz-Carver
 - c. [Approval of FY26 Internal Audit Work Plan](#) Chief Internal Auditor, Virginia Kalil
- IV. New Business – Information Items
 - a. [Internal Audit Annual Report 2024-2025](#) Chief Internal Auditor, Virginia Kalil
 - b. [Foreign Travel Annual Report 2024-2025](#) Director, Research Integrity & Compliance
Dr. Jason Ramage
- V. Adjournment Chair Callahan

Agenda Item: III.b

USF Board of Trustees
September 9, 2025

Issue: Foreign Influence Annual Report

Proposed action: Approval to submit Foreign Influence Annual Report to the Board of Governors

Executive Summary:

Board of Governors (BOG) Regulation 9.012(9), *Foreign Country of Concern Reporting Requirements*; and subsequent October 2023 Guidance: *Activities with Foreign Countries of Concern*, requires each state university board of trustees to submit a report to the Board of Governors for approval relating to all grant programs, agreements, partnerships, and contracts between the state university and any colleges and universities based in a foreign country of concern and foreign principals (the "Foreign Influence Annual Report"). This report covers the prior fiscal year (July 1- June 30) and captures general information using a template approved and provided by the SUS Chancellor. The Foreign Influence Annual Report must be submitted to the BOG by September 30.

We are seeking approval to submit the Foreign Influence Annual Report to the Board of Governors.

Financial Impact: Failure to timely submit an accurate Foreign Influence Annual Report may result in sanctions by the Board of Governors, including, but not limited to, withholding performance funding.

BOT Committee Review Date: 08/22/2025

Supporting Documentation Online (please circle):

☒ **Yes**

☐ **No**

Prepared by: Jorge Rodriguez, Associate Compliance Officer & Foreign Influence Compliance Officer, and Caroline Fultz-Carver, Chief Compliance Officer

Foreign Influence Annual Report

(July 1, 2024 – June 30, 2025)

Caroline Fultz-Carver, PhD, MHA, CCEP
Chief Compliance Officer



Foreign Influence Annual Report



Our university must submit an annual report to the Board of Governors (BOG) of all its grants, partnerships, agreements, and contracts with any colleges or universities based in a foreign country of concern or with a foreign principal (the “Foreign Influence Annual Report”). The reporting period is for the prior fiscal year. The report must be submitted to the BOG using a template approved by the State University System Chancellor by September 30th each year.

The Foreign Influence Annual Report requires Board of Trustee approval to submit the report to the BOG.

[BOG Regulation 9.012(9), Foreign Country of Concern Reporting Requirements, and BOG Guidance: Activities with Foreign Countries of Concern (October 2023)]

Key Terms

Foreign Country of Concern (FCOC)

People's Republic of China
Russian Federation
Islamic Republic of Iran
Democratic People's Republic of Korea
Republic of Cuba
Venezuelan regime of Nicolás Maduro
Syrian Arab Republic

*Includes any agency of or any other entity
under significant control of these countries*

Foreign Principal

- 1) Government or an official of the government of a FCOC
- 2) Political party or a member of a political party of a FCOC
- 3) Partnerships, associations, corporations, organizations, or other combinations of persons organized under the laws of or having its principal place of business in a FCOC, including subsidiaries of these entities
- 4) Any person domiciled in an FCOC, where “domiciled” means the person is physically present in a FCOC with an intent return to the FCOC and “intent” is demonstrated by an absence of seeking citizenship in the United States

Summary

Six purchase orders for commodities, which were all

- Unrelated to an academic or research collaboration with a FCOC or Foreign Principal
- Met exemption criteria from the BOG preapproval requirement; however, requires reporting per BOG October 2023 guidance
- Expired during the reporting period (July 1, 2024 - June 30, 2025)

Foreign Influence Compliance Partners

Data and Process Owners

- Foundation
- Institutional Research
Effectiveness & Assessment
- Purchasing Services
- Sponsored Research
- USF Direct Support Organizations
- University Controller's Office
- USF Health International
- USF Health Office of Clinical Research
- USF World

Project Lead and Compliance Reviews

Foreign Influence Compliance within the
Office of Compliance & Ethics

Legal Consultants

Office of the General Counsel

Discussion

Agenda Item: III.c

USF Board of Trustees

September 9, 2025

Issue: USF Internal Audit (IA) Work Plan for FY 2026

Proposed action: Approval of the IA Work Plan and allocation of resources.

Executive Summary: In accordance with the USF IA Charter, the USF Board of Trustees' Audit and Compliance Committee and the President have the responsibility to review approve the IA Work Plan. Additionally, the Global Internal Audit Standards, Board of Governors' regulations, and the IA Charter require the Chief Audit Executive to communicate the plans and resource requirements to senior management and to the board for review and approval.

The Board should consider whether the IA Work Plan is aligned with USF's strategic plans, objectives, and enterprise risk. Consider whether this plan optimizes the use of IA resources and the value added by the audit activity in the following areas: results of operations, programs, or projects, including accomplishment of objectives and effective use of resources; reliability and integrity of financial and operating information; compliance with policies, laws, regulations, and ethical standards; the means to safeguard assets; loss prevention; fraud detection; and process improvement.

Financial Impact: N/A

BOT Committee Review Date: 08/22/2025

Supporting Documentation Online (please circle): Yes No

FY26 USF IA Work Plan Overview 20250822 FR.pdf

FY26 USF IA Work Plan 20250822 DR.pdf

Prepared by: Virginia Kalil, Executive Director/Chief Internal Auditor, USF Internal Audit

Internal Audit Work Plan

Fiscal Year 2026

Virginia L. Kalil, CIA, CISA, CFE, CRISC

Executive Director/Chief Internal Auditor



Audit & Compliance Committee | August 22, 2025



UNIVERSITY of
SOUTH FLORIDA
Office of Internal Audit

Introduction

The Office of Internal Audit (IA) provides the University of South Florida (USF) and its direct support organizations (DSOs) with independent and objective assurance and advisory services to assist them in effectively and efficiently achieving their strategic goals by evaluating and improving risk management, control, compliance, and governance processes. These services add value and promote stewardship, accountability, integrity, efficiency, and compliance. In order to facilitate these services, IA develops a risk-based work plan to ensure internal audit resources are appropriate, sufficient, and effectively deployed.

Professional Standards

Professional auditing standards¹ require the Chief Audit Executive (CAE) to establish an internal audit plan that supports the achievement of the organization's objectives. The CAE must base the internal audit plan on a documented assessment of the organization's strategies, objectives, and risks. The CAE must then communicate the internal audit activity's plans and resource requirements, including significant interim changes, to senior management and the board for review and approval.

Risk Assessment

In developing the risk-based plan, IA consults with senior management, the board, and other internal risk professionals (Compliance, Risk Management, Information Security, Legal, Human Resources, Police, etc.) to obtain an understanding of the organization's strategies, key business objectives, associated risks, and risk management processes.

Resources

Once the risk assessment is complete, projects are identified and prioritized in the areas of highest risk and interest (board, senior management, IA). Project hours are then estimated and aligned with available resources. Use of external auditing services may also be considered to supplement planned resources as deemed necessary.

Plan Highlights

The work plan for fiscal year 2026 will include assurance coverage of performance metrics data integrity, information technology (IT), stadium construction, Human Capital Management, Physical Security, Athletics, and the DSOs. In addition, IA will provide advisory services related to fraud awareness, risk management, Human Capital Management interfaces, Contract & Grant reporting, Visa issuance and monitoring, and emerging risks.

¹ *Global Internal Audit Standards – Standard 9.4 Internal Audit Plan.*

Allocation of Time

Type of Service		Total	% of Total	Description
Risk-Based Engagements				
	Assurance	4,100	13%	Audits of operations and processes to address identified risks
	Advisory	3,030	10%	Consulting services requested or identified
	Direct Support Organizations	3,360	11%	Direct support organization assurance and advisory engagements
Required Engagements		900	3%	Engagements required by statute, external entities, policies, etc.
Investigations		2,729	9%	Hours reserved for investigations, EthicsPoint complaints, and special projects
Follow-up		400	1%	Follow-up on management action plans from prior engagements
General & Administrative				
	Personnel Management & Quality Review	10,500	34%	Leave, Holiday, Training, Administrative Activities, Quality Assurance Program
	Recruitment & Onboarding	400	1%	Talent search, hire, and integration
Vacancy		3,910	12%	Estimate of potential loss of resource
Contingency		1,871	6%	Reserve
		31,200	100%	

University Planned Engagements

- Cybersecurity
- Database Infrastructure-Oracle
- Database Infrastructure-SQL
- Microsoft 365 Platform
- Physical Security
- Stadium Construction
- Athletics
- Oracle Human Capital Management
- Business and Finance Shared Services
- Performance-Based Funding Data Integrity
- Preeminence Data Integrity
- Fraud Analytics & Awareness
- Banking Wires/EFTs
- Human Capital Management System Interfaces
- Contracts & Grants Reporting
- Visa Issuance & Monitoring
- Emerging Risks

Direct Support Organizations Planned Engagements

- Compliance with USF Requirements
- Donor Intent
- Cybersecurity Response Plan
- Lab Safety
- Government Property
- Cybersecurity Maturity Model Certification Advisory
- Contractual Funds Flow
- Compensation
- Attractive Items
- External Audit Support
- Preeminence
- Emerging Risks



Agenda Item: IV.a

USF Board of Trustees Audit & Compliance Committee August 22, 2025

Issue: USF Office of Internal Audit (IA) Annual Report for 2024-23

Proposed action: Informational

Executive Summary:

The IA Work Plan for fiscal year 2024-25 was approved by the Audit & Compliance Committee on August 27, 2024. This Annual Report describes the internal audit, advisory, and investigative activities and allocation of resources as compared to the approved Work Plan.

In FY 2025, the audit team completed 17 audits, 26 advisory projects, and 38 investigations. Audit project summaries are included in the report. Additionally, semiannual follow-up reports were produced summarizing the status of management's actions plans to address risks identified.

As part of the department's Quality Assurance and Improvement Program (QAIP), internal assessments performed throughout the year confirmed IA's conformance with the Institute of Internal Auditors' International Standards for the Professional Practices of Internal Auditing, Code of Ethics, and Core Principles as well as the new Global Internal Audit Standards.

Financial Impact: N/A

BOT Committee Review Date: 08/22/2025

Supporting Documentation Online (please circle):

Yes

No

2024-25 Annual Report Overview 20250822 FR.pdf

2024-25 Internal Audit Annual Report 20250822 FR.pdf

Prepared by: Virginia Kalil, Executive Director/Chief Internal Auditor, USF Internal Audit

Internal Audit Annual Report

Fiscal Year 2025

Virginia L. Kalil, CIA, CISA, CFE, CRISC

Executive Director/Chief Internal Auditor

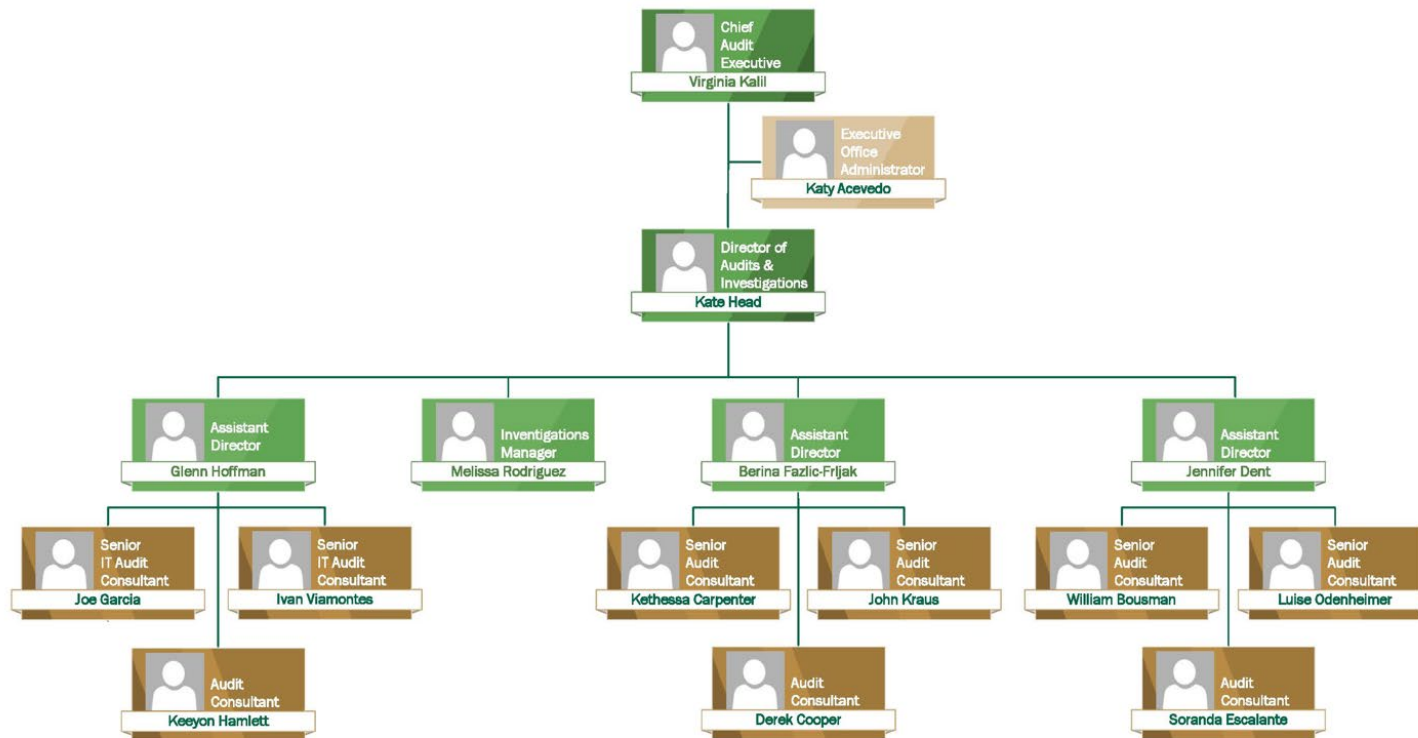


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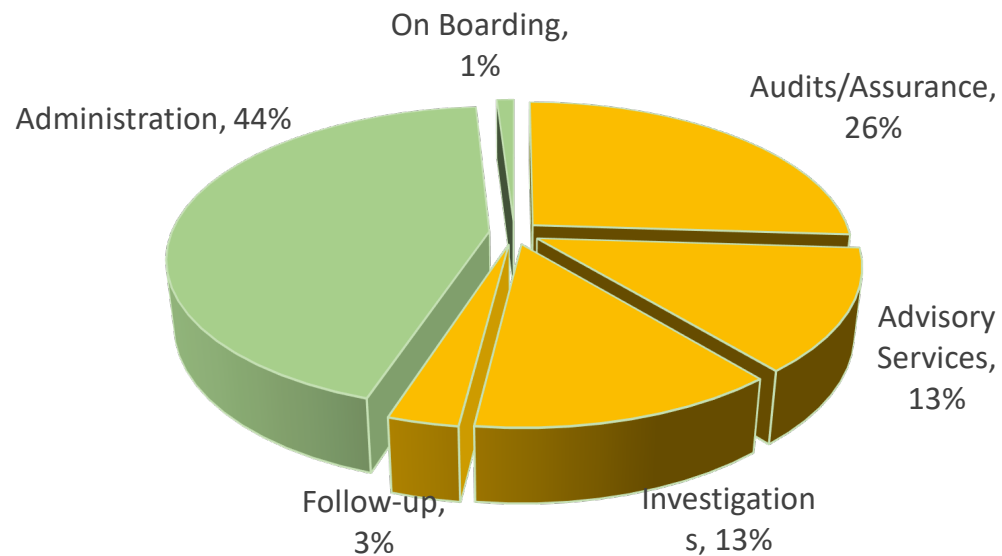


UNIVERSITY of
SOUTH FLORIDA
Office of Internal Audit

Organizational Chart as of June 30, 2025



Total Resource Allocation



PROJECT	BUDGET	%	ACTUAL	%
DIRECT SERVICES:				
Audit/Assurance	6,350	22%	7,908	26%
Advisory Services	4,230	14%	3,874	13%
Investigations	2,700	9%	3,823	13%
Follow-up	600	2%	835	3%
Contingency	1,900	7%	0	0%
Total Direct Services	15,780	54%	16,440	55%
OTHER:				
Administration	11,060	38%	12,949	44%
On Boarding	200	1%	251	1%
Unplanned Leave/Vacancy	2,080	7%	80	0%
Total Other	13,340	46%	13,280	45%
TOTAL	29,120	100%	29,720	100%

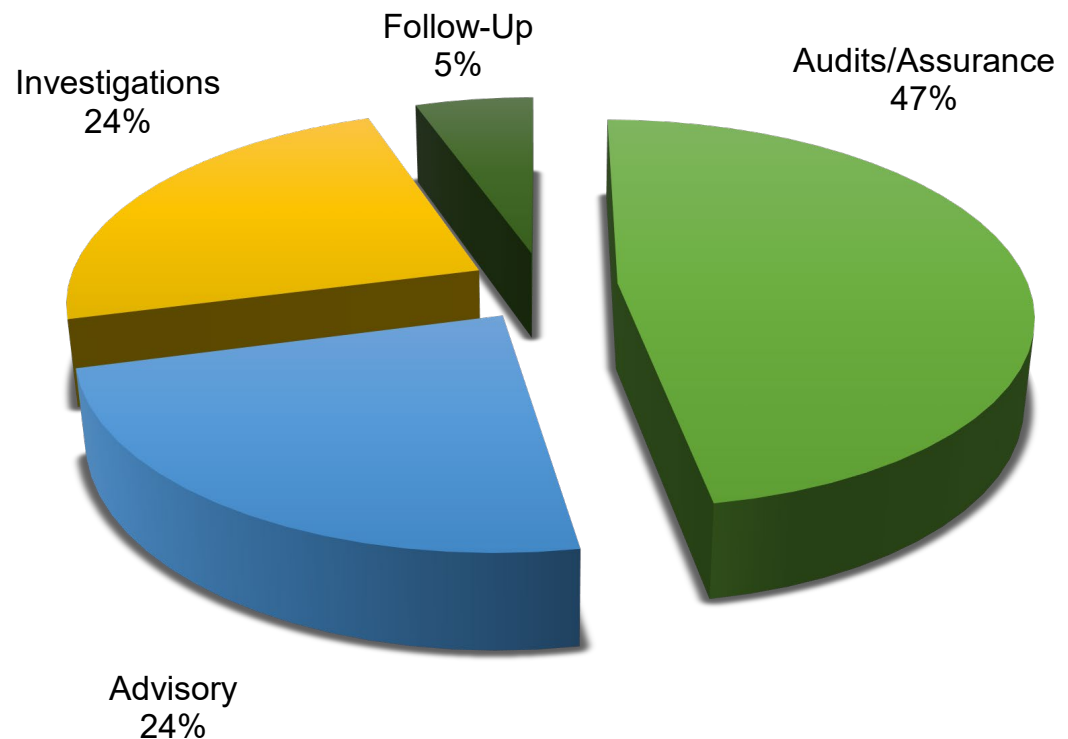
Direct Services Highlights

Completed

- 17 audits (6 IT)
- 26 advisory project (7 Major)
- 38 investigations

In Progress

- 2 major consulting project
- 12 investigations



University Audits Completed

- Performance-Based Funding Data Integrity
- Preeminence Data Integrity
- Foreign Influence Travel
- Foreign Influence – Screening Foreign Researchers
- Decentralized Information Technology (IT)
- Network Infrastructure
- Cloud Computing
- IT Change Management
- Remote Access

Direct Support Organizations Audits Completed

- USF Foundation Scholarship Awards
- USF Foundation Donor Intent
- University Medical Services Association Travel Expenditures
- University Medical Services Association Data Privacy
- Institute of Applied Engineering Deltek Logical Access Review
- Institute of Applied Engineering Procurement Card Audit
- USF Research Foundation Intellectual Property
- USF Research Foundation Accounting Policies

Risks & Action Plans

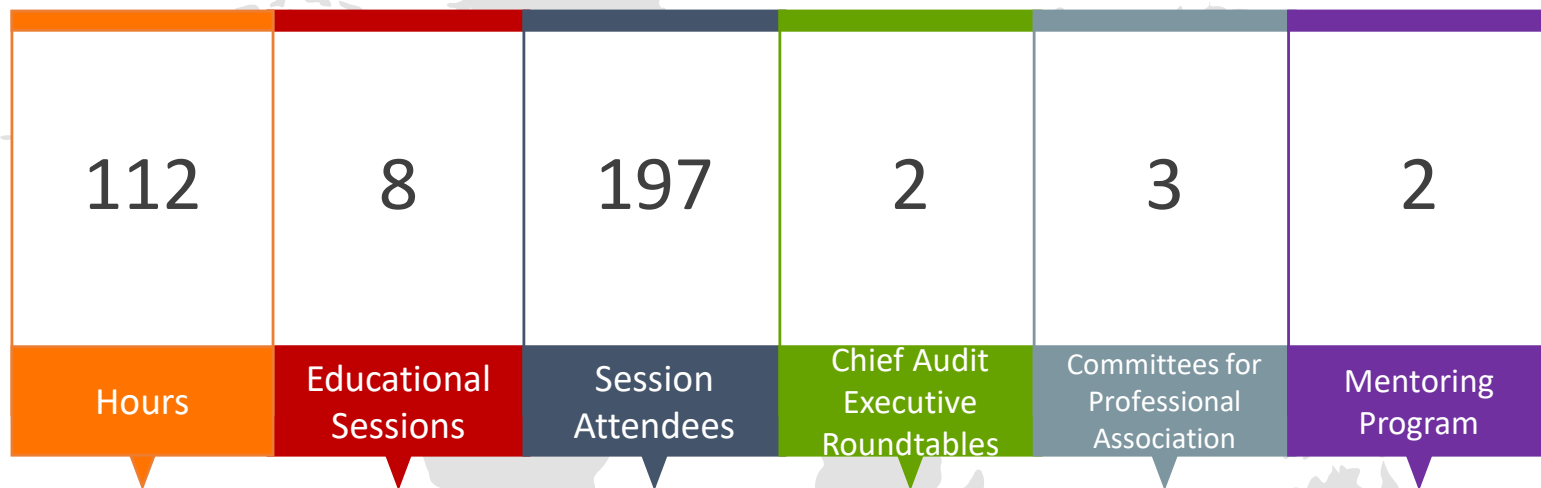
- Categories:
 - *Assignment of Responsibility*
 - *Authorization: Adequacy & Timeliness*
 - *Compliance with Federal Laws*
 - *Compliance with State and Local Laws (Not USF)*
 - *Donor/Grantor Intent*
 - *Effective & Efficient Operations*
 - *IT: Confidentiality, Integrity, & Availability of Data/Systems*
 - *Reporting: Accuracy, Completeness, & Timeliness*
 - *Safeguarding of Assets*
 - *Separation of Duties*
 - *Training & Guidance: Accuracy, Completeness, & Timeliness*
- 93% implementation rate of management action plans*

**Adjusted to exclude action plans not yet due on June 30, 2025*

Quality Assurance & Improvement Program

- Internal assessments confirmed conformance with the Institute of Internal Audit (IIA) Standards
- External assessment required every five years performed in 2023 confirmed conformance with IIA Standards
- Next external assessment planned to be conducted in Spring 2028

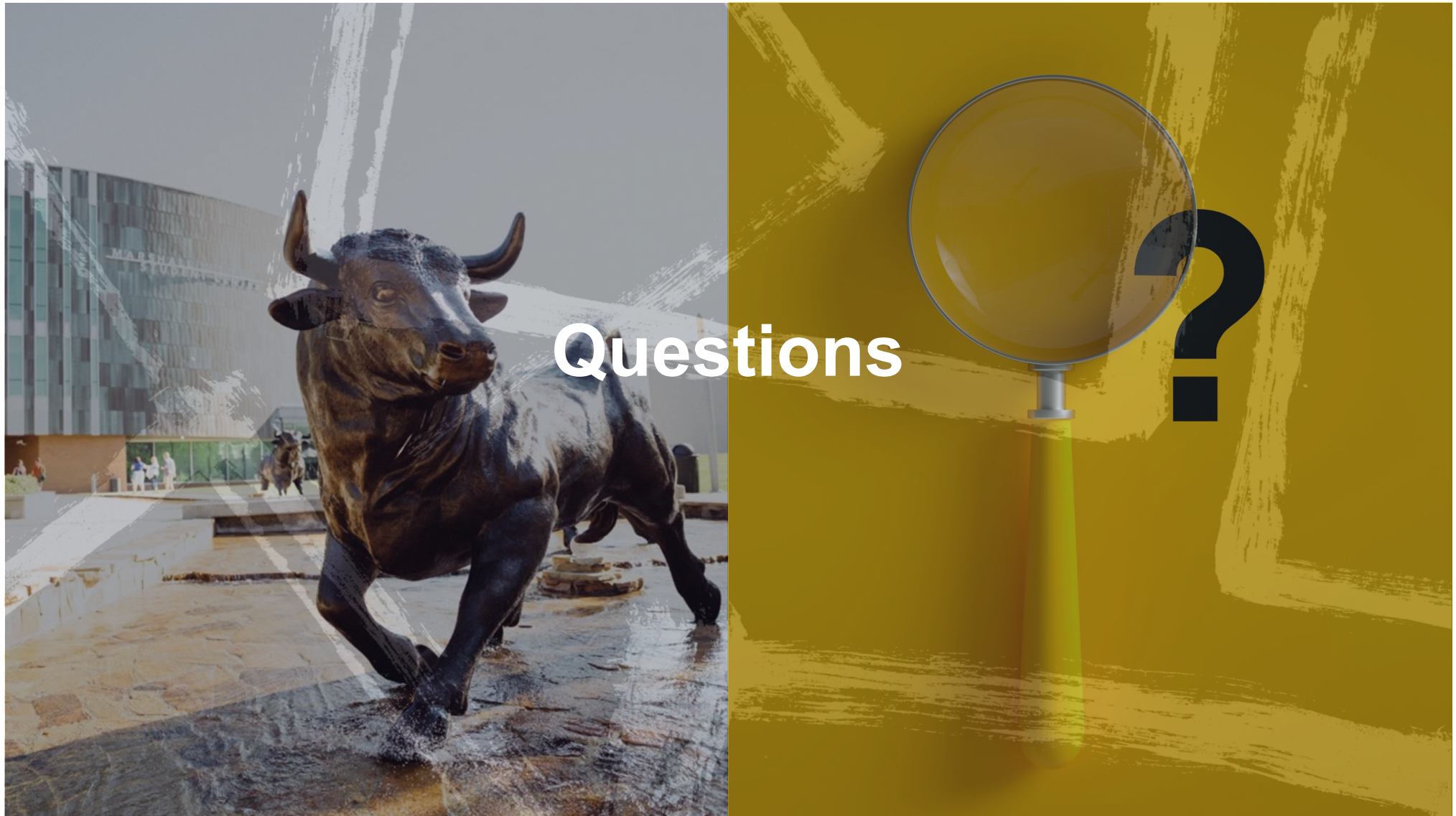
Service to the Profession



112	8	197	2	3	2
Hours	Educational Sessions	Session Attendees	Chief Audit Executive Roundtables	Committees for Professional Association	Mentoring Program

- Information Technology (IT)
- Data Analytics
- Governance

- Quality Assurance
- Fraud Prevention & Detection



Agenda Item: IV.b

**USF Board of Trustees
Audit & Compliance Committee
August 22, 2025**

Issue: Annual Foreign Travel Report

Proposed action: Informational

Executive Summary:

Florida Statute 1010.36, Foreign Travel and Research Institutions, requires all SUS institutions to establish an approval and monitoring program for international travel by January 1, 2022. Section 1010.36(4) requires USF to submit an annual report of employment-related foreign travel to countries of concern to the Board of Governors (BOG) or other appropriate governing board. In 2022, the BOG issued guidance clarifying that the annual travel report must be submitted to the USF Board of Trustees on July 31, beginning in 2022. The attached report represents the annual foreign travel report and covers the period from July 1, 2024 through June 30, 2025. The report also includes additional travel in fiscal periods 2023 and 2024 that, although reviewed and approved, had not been previously identified as completed travel and therefore are being reported now.

Financial Impact: N/A

BOT Committee Review Date: August 22, 2025

Supporting Documentation Online (please circle):

Yes

No

Prepared by: Mitchell McNelly, Senior Foreign Influence Analyst and Jason Ramage, Director of Research Integrity & Compliance

Annual Foreign Travel Report

July 1, 2024 – June 30, 2025

Jay Ramage, PhD, MS, MBA
Director, Research Integrity & Compliance
USF Research & Innovation



Legislative Requirements

- Florida Statute 1010.36 requires all SUS institutions to establish an approval and monitoring program for international travel.
- Section 1010.36(4) requires USF to submit an annual report of foreign travel to the Board of Governors (BOG) or other appropriate governing board.
- The BOG issued guidance stating the annual report must be submitted to the USF Board of Trustees on or before July 31 of each year.

Foreign Countries of Concern (FCOC)

People's Republic of China

Russian Federation

Islamic Republic of Iran

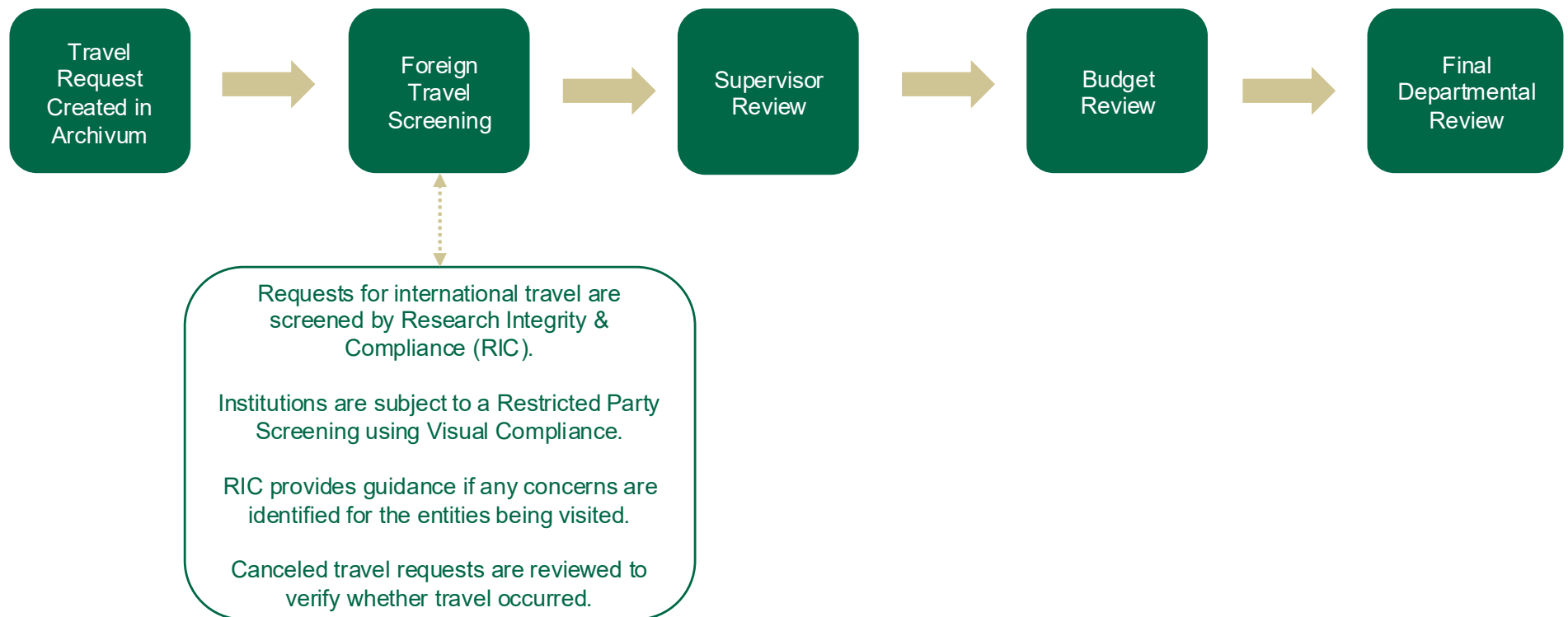
Democratic People's Republic of Korea (North Korea)

Republic of Cuba

Venezuelan regime of Nicolás Maduro

Syrian Arab Republic

Travel Review Process



Summary

- In fiscal period 2025 (July 1, 2024 – June 30, 2025), RIC conducted a total of 1504 screenings for international travel (a 6% increase over FY 2024). Of this total, 18 (1.2%) involved an FCOC
- Of FCOC travel, 1 (6%) involved travel to Cuba and 17 (94%) involved travel to China
- The report also includes additional travel in fiscal periods 2023 and 2024 that, although reviewed and approved, had not been previously identified as completed travel

Annual Foreign Travel Report

July 1, 2024 – June 30, 2025

Traveler	Foreign Country of Concern Visited	City(ies) Visited	Institution(s) Visited
Adam Carmer	People's Republic of China	Hong Kong	Hong Kong Polytechnic University, Hotel ICON
Kyoung Cho	People's Republic of China	Changchun	Changchun Normal University, Changchun Music Institute
Liwang Cui	People's Republic of China	Kunming, Shenyang	China Medical University, Kunming Medical University
Heather Judkins	People's Republic of China	Hong Kong	Hong Kong University of Science and Technology
Frank Muller-Karger	People's Republic of China	Hong Kong	University of Hong Kong
Seckin Ozkul	People's Republic of China	Beijing	Tongji University
Christina Richards	People's Republic of China	Kunming	Xishuangbanna Tropical Botanical Garden
John Robison	People's Republic of China	Xian	Xi'an Conservatory of Music
John Robison	People's Republic of China	Beijing	Central Conservatory of Music, Yansha Shopping Mall, Beijing Perth Music Company
Isabel Romero	People's Republic of China	Hong Kong	Hong Kong University of Science and Technology

Annual Foreign Travel Report

July 1, 2024 – June 30, 2025 (continued)

Traveler	Foreign Country of Concern Visited	City(ies) Visited	Institution(s) Visited
Yicheng Tu	People's Republic of China	Hong Kong	Hong Kong Polytechnic University, Hong Kong University of Science and Technology
DaZhi Wang	People's Republic of China	Kunming	Chinese Biological Investigators Society, Guizhou University, Guizhou Medical University, Chinese Society of Biochemistry and Molecular Biology, Chinese Society of Cell Biology
Zhigao Wang	People's Republic of China	Guangzhou	GuangZhou Laboratory, TNF Superfamily Conference, Chinese Society for Cell Death Research, Chinese Society for Cell Biology
Samuel Wu	People's Republic of China	Zhuhai, Hangzhou	International Chinese Statistical Association, Zhejiang University, Joint Conference on Statistics and Data Science in China, Chinese Society of Survey Statistics, Chinese Society of Probability and Statistics, National Industrial Statistics Teaching and Research Association, Chinese Society of Business Statistics, The Bernoulli Society, Beijing Normal University
Xinyan Yan	People's Republic of China	Shenzhen	China International Conference in Finance, Cheung Kong Graduate School of Business, The Chinese University of Hong Kong, Shenzhen Institute of Data Economy, Shanghai Advanced Institute of Finance, Shanghai Jiao Tong University, Southern University of Science and Technology, Chinese Association of Finance
Gabriel Picone	Republic of Cuba	Varadero	VII International Congress on Comprehensive Management of Complex Ulcers and Wounds, Center for Genetic Engineering and Biotechnology, Palacio de la Convenciones

Annual Foreign Travel Report

July 1, 2023 – June 30, 2024

(travel not previously reported on FY2024 annual report)

Traveler	Foreign Country of Concern Visited	City(ies) Visited	Institution(s) Visited
Ilene Berson	People's Republic of China	Shanghai	Shanghai Institute of Early Childhood Education
Michael Berson	People's Republic of China	Shanghai	Shanghai Institute of Early Childhood Education
Chi-Keung Fung	People's Republic of China	Hong Kong, Guangzhou	Guangzhou University
Chi-Keung Fung	People's Republic of China	Hong Kong, Shanghai, Xiamen	Shanghai Conservatory of Music / Jimei University / Anhui Normal University
John Robison	People's Republic of China	Xi'an	Shaanxi Normal University
Yicheng Tu	People's Republic of China	Jiaxing	Yangtze Delta Region Research Institute of Tsinghua University
Gabriel Picone	Republic of Cuba	Havana	Cuban Society of Cardiology / Cuban Congress of Endocrinology / Cuba-Mexico International Symposium on Obesity / Havana International Conference Center

Annual Foreign Travel Report

July 1, 2022 – June 30, 2023

(travel not previously reported on FY2023 annual report)

Traveler	Foreign Country of Concern Visited	City(ies) Visited	Institution(s) Visited
Gert-Jan de Vreede	People's Republic of China	Beijing	Renmin University
Yicheng Tu	People's Republic of China	Dalian	Beijing University of Technology / 2023 Asia-Pacific Conference on Image Processing, Electronics and Computers
Tiffany Chenneville	Republic of Cuba	Havana	Cuban Society of Psychology
Gabriel Picone	Republic of Cuba	Havana	University of Havana / Center for Genetic Engineering and Biotechnology
Gabriel Picone	Republic of Cuba	Havana	University of Havana / Center for Genetic Engineering and Biotechnology

Research Integrity & Compliance Foreign Influence Team

- Fred Pflueger, PhD, Export Control Officer
- Mitchell McNelly, MA, Senior Foreign Influence Analyst
- Urika DelVecchio, MA, Foreign Influence Analyst

Questions