

INTERNAL AUDIT

Fiscal Year 2026 Annual Audit Plan



TEXAS SECRETARY OF STATE
Internal Audit
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Overview of SOS Internal Audit Annual Audit Plan Fiscal Year 2026

Introduction

This document provides the Fiscal Year 2026 Annual Audit Plan as required by *The Texas Internal Auditing Act (Texas Government Code, Ch. §2102.008)*. This plan provides our vision of Internal Audit efforts for the fiscal year, allocating resources to the most critical areas within the Secretary of State's Office (SOS).

Projects were identified for the Audit Plan by using a risk assessment model that considered input from SOS management. Using that input, Internal Audit exercised auditor judgment in prioritizing projects for the coming year.

Internal Audit's Vision

To be a valued, trusted and sought-after partner with management. To provide a product that contributes materially to the operational performance and governance processes of the SOS.

Internal Audit Objective

To assist effectively the agency's responsibility to maintain:

- 1) Effective and efficient operations
- 2) Reliability of financial and operational reporting
- 3) Compliance with laws and regulations
- 4) The safeguarding of agency assets

Audit Charter and Definition

The Audit Charter approved by the Secretary of State and Deputy Secretary of State in May 2024 provides authorization to Internal Audit personnel for full, free, and unrestricted access to any of the agency's systems, records (manual or electronic), functions, property, and personnel relevant to the performance of statutory responsibilities and duties assigned by the Secretary of State and Deputy Secretary. The charter also defines reporting relationships, the scope of audit work, audit reporting, and follow-up responsibilities.

The Definition of Internal Auditing states the fundamental purpose, nature, and scope of internal auditing.

*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.*¹

¹ Institute of Internal Auditors – *International Professional Practices Framework*, January 2024

Risk Assessment

Internal Audit develops the Audit Plan by first conducting a comprehensive risk assessment of agency program and activities, which includes obtaining input from agency management. Internal Audit prepared a risk assessment matrix, which is sent to management for completion. The risk assessment matrix ranked program activities based on probability and impact. Internal Audit had an 88% response rate to the risk assessment questionnaire.

A risk assessment is performed each year to identify the agency's audit universe and to prioritize the relative risk of each auditable activity within the audit universe. Through this ranking process, the auditor can more objectively and effectively identify and present a risk-based plan to agency management and the Secretary of State and Deputy Secretary of State for review and approval.

The goal of the risk assessment process is to determine units exposed to high risk and to allocate limited audit resources appropriate to that level of risk. Steps to accomplish this purpose, which ultimately results in audit selection and inclusion in the annual audit plan, include the following:

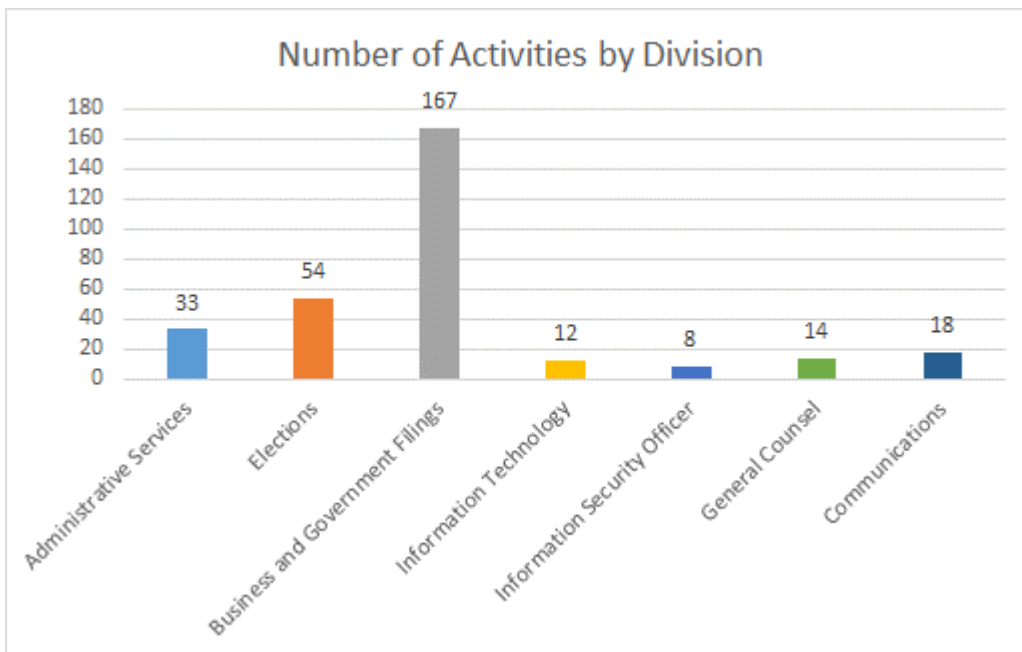
1. Identifying and cataloging auditable activities (the "audit universe") of the agency.
2. Selecting the criteria (risk categories) used to identify the significance of and likelihood that conditions and/or events may occur that would adversely affect the organization.
3. Developing definitions and guidelines relating to probability and impact rankings.
4. Preparing a risk matrix which includes each universe item to be ranked.
5. Computing the combined ranking for each universe item and the cumulative ranking.
6. Selecting and prioritizing the audits to be conducted.
7. Examining available resources.

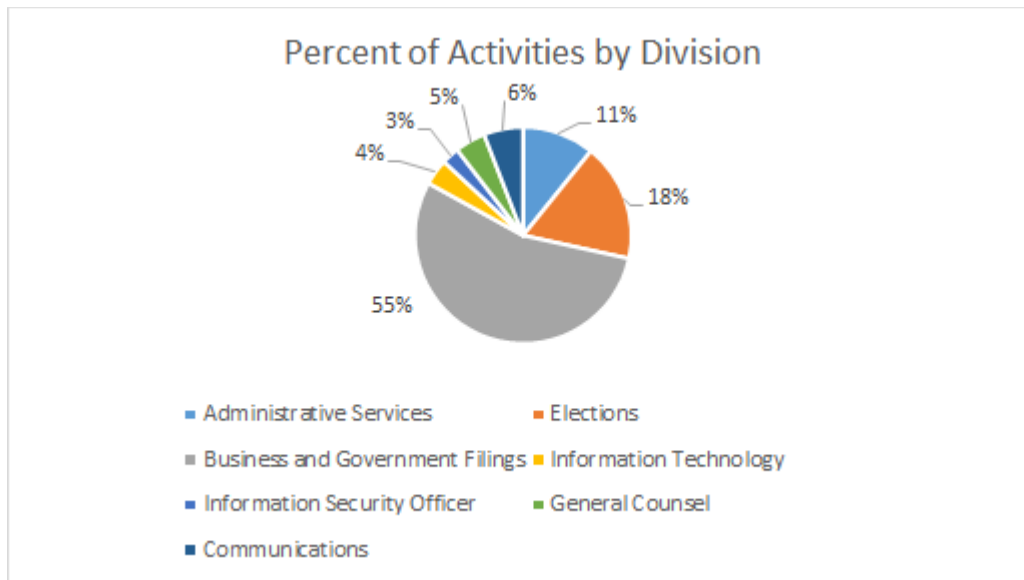
The following functional areas were asked to participate in the risk assessment process:

- Administrative Services Division
- Business and Government Filings Division
- Communications Division
- Elections Division
- General Counsel
- Information Security Officer
- Information Technology Division

Internal Audit prepared a worksheet for each functional area that contained a listing of activities conducted in each area. Each functional area was asked to complete the worksheet by reviewing the activities previously identified by Internal Audit and providing any updates, deletions or corrections. Individual activities were ranked based on probability and impact and assigned a ranking from high to low.

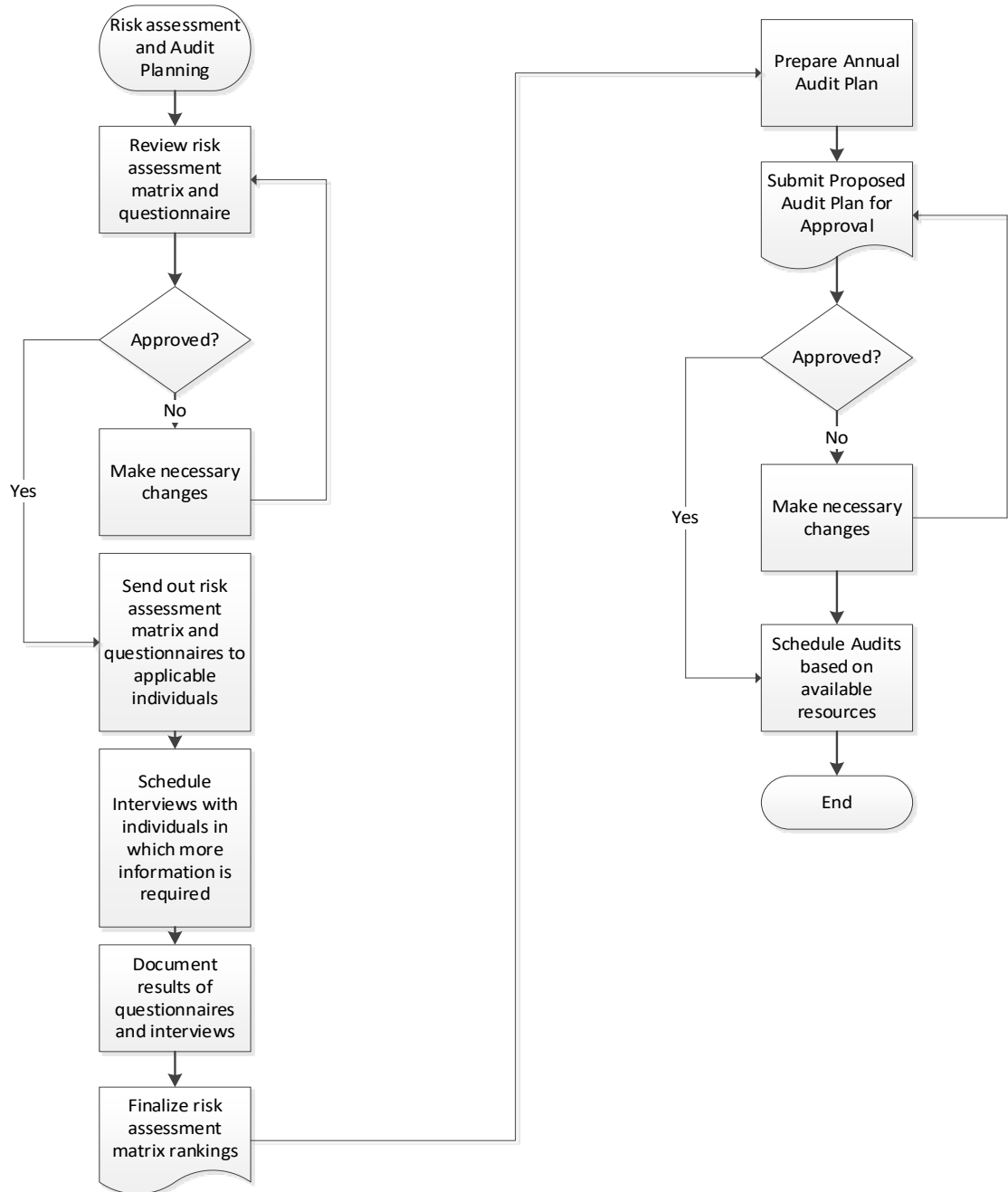
Internal Audit identified 306 activities conducted by the Secretary of State's Office. Internal Audit requested each division rank the individual activities based on probability and impact.



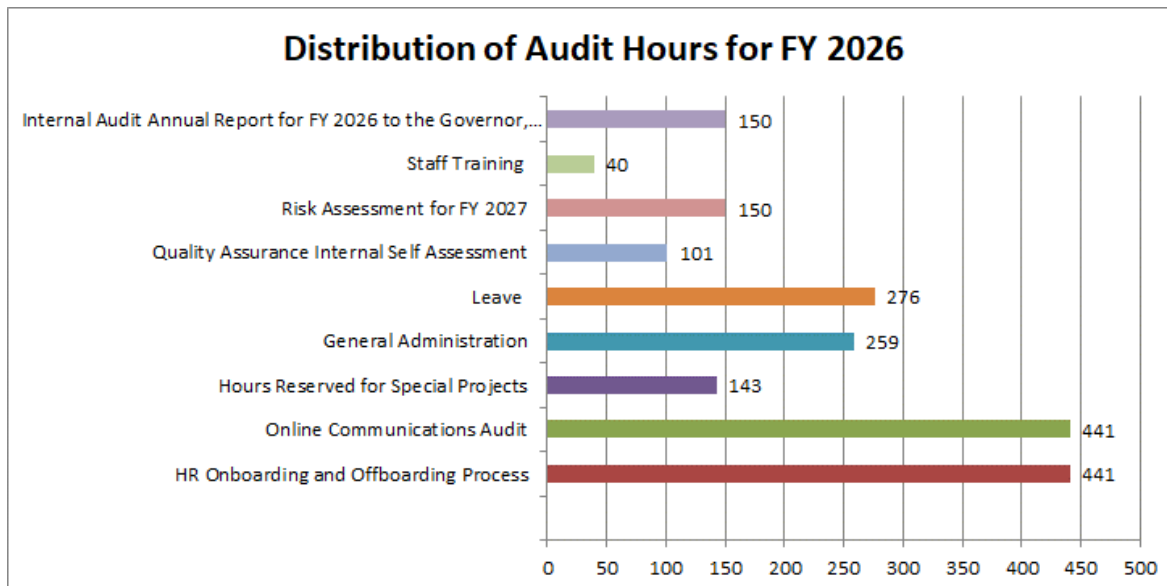


The following diagram depicts a high-level view of the risk assessment and audit planning process.

Texas Secretary of State
Internal Audit
Risk Assessment and Audit Planning Process



The Chart below shows Internal Audit's budgeted time allocations for the coming fiscal year.



Acceptable Level of Risk

Although the Audit Plan contemplates a range of audit effort, it does not provide coverage for all SOS components or systems. Internal Audit attempted to maximize Internal Audit resources to provide reasonable coverage of the business activities requiring the most attention.

However, because Internal Audit cannot audit every area, it is important for the Secretary of State, Deputy Secretary of State and management to understand the limitations of the audit coverage. Internal Audit believes that this plan allocates Internal Audit resources to the most important priorities and risks of the agency at this point in time.

Internal Audit is committed to being a valuable resource in improving the agency's operations and proposes a plan that targets key processes, yet builds flexibility to allow for the Secretary of State, Deputy Secretary of State and management requests that require immediate attention.

In recognition that operating environments and risks are subject to change, Internal Audit may adjust its Internal Audit Plan to address significant changes that occur throughout the year. In response to unanticipated changes in the operating environment, some projects included in the plan may not be performed and others may be added. Proposed modifications to the Internal Audit Plan will be communicated to the Secretary of State and Deputy Secretary of State for approval.

Fiscal Year 2026 Internal Audit Plan Allocation

The Audit Plan depicts hours allocated to audit engagements in various programs and Divisions of the Secretary of State's Office and is shown in Schedule 1. Detailed objectives will be formalized for each engagement during the planning process.

The Audit Plan includes the following sections:

Projects Carried Forward

There are no carryover projects from FY 2025.

Financial and Performance Assurance Activities

Internal Audit provides assurance services for the agency, which are defined as objective examinations of evidence for providing an independent assessment on risk management, control, and governance processes for the organization. Examples may include financial, compliance, economy and efficiency, effectiveness, investigations, and information technology engagements.

Special Initiatives

In addition to assurance and consulting engagements, Internal Audit allocates resources toward special initiatives. These initiatives include any liaison activities

that may occur during the year and special requests to be responsive to the immediate needs of the Secretary of State, Deputy Secretary of State and management.

Consulting and Advisory Activities

By definition, internal auditing includes the provision of consulting services. Consulting services are advisory and related client service activities, the nature and scope of which are agreed upon with the client. These activities are intended to add value and improve an organization's governance, risk management, and control processes without the internal auditor assuming management responsibility.

Examples include counsel, advice, facilitation, and training. Progressive Internal Audit departments provide additional management assistance or consulting services to their organizations. Upon request, Internal Audit will provide both formal and informal advice and suggestions on management issues, concerns, and draft policies and procedures.

Additionally, Internal Audit will provide representation on SOS committees and working groups as needed and requested by the Secretary of State, Deputy Secretary of State and management. By providing consulting or advisory activities, Internal Audit adds value to the SOS beyond assurance services and assists in strengthening agency internal controls.

Administrative Activities

Internal Audit included hours for various administrative activities, some of which are mandated either by the professional standards or required by statute. Leave time for Internal Audit is also included to show a full picture of hours to be used by Internal Audit during the year.

Professional Standards

Internal Audit adheres to *Government Auditing Standards*, as promulgated by the U.S. Government Accountability Office and the *International Standards for the Professional Practice of Internal Auditing*, as promulgated by the Institute of Internal Auditors, which includes the *Code of Ethics*. In addition, Internal Audit conforms to requirements found in the *Texas Internal Auditing Act* (Texas Government Code Chapter 2102 and complies with all policies and procedures of the SOS.

Changes Subsequent to Approval

Changes in operations, priorities, workloads, and timing of agency initiatives, management requests, and staff availability may affect the audit plan and require changes to the approved audit plan. Internal audit will assess emerging risks and monitor the audit plan throughout the year and consult with Executive Management to adjust the plan as needed. Material recommendations for change to the audit plan will be submitted to Executive Management for approval.

Closing

Audit plans act as a guide for audit departments. Internal Audit's plan includes proposed projects and other initiatives to perform during the year. Internal Audit budgeted time for special requests in order to be responsive to the immediate needs of the Secretary of State, Deputy Secretary of State and management as they may arise throughout the fiscal year.

As discussed above under "Acceptable Level of Risk", the Internal Audit plan does not, nor is it intended to, address or provide complete coverage for all SOS components or system risks. Internal Audit believes that this plan allocates the resources of Internal Audit to the most important priorities and risks of the agency at this point in time.

Internal Audit wishes to thank SOS management and staff for their assistance in providing information, which led to the development of this proposed plan. In addition, Internal Audit looks forward to helping the agency meet its objectives this fiscal year. For further information on the FY2026 Internal Audit Plan, please contact Darrell Carter, at (512) 475-2726 or by email at wcarter@sos.texas.gov.

Schedule 1 - Fiscal Year 2026 Internal Audit Plan

PROJECT NUMBER	PROJECT DESCRIPTION (Note E)	Program (Note A)	BUDGETED FY 2026 HOURS
Projects Started and Carried Forward from Fiscal Year 2025			
		AW	
	Subtotal Carry Forward Projects		0
Financial / Performance Assurance Activities			
2026-300	HR Onboarding and Offboarding Process	ASD	441
2026-301	Online Communications Audit	AW	441
	Subtotal Financial / Performance Audits		882
Special Initiatives			
Various	Hours Reserved for Special Assigned Audits, Investigations or Advisory Projects	N/A	143
Consulting / Advisory Activities			
2026-600	Language Translation Process		
	Subtotal Advisory / Liaison Projects		0
	Subtotal - Audits, Investigations and Advisory Projects		1,025
Administrative & Required Internal Audit Activities			
2026-400	General Administration (Note B)	N/A	259
	Leave (Note C)	N/A	276

Texas Secretary of State's Office
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Pending	Quality Assurance Internal Self-Assessment (Note G)	N/A	101
Pending	Risk Assessment for FY 2027	N/A	150
2026-401	Staff Training (Note F)	N/A	40
2026-402	Internal Audit Annual Report for FY 2026 to the Governor, LBB, SAO	N/A	150
Subtotal - Administrative & Other Internal Audit Projects			976
Total Available Hours (Note D)			2,000

Notes:

Acronyms: SOS-Secretary of State; IR-Information Technology; AW-Agency Wide; ASD-Administrative Services; AG-Agency Counsel; HR-Human Resources; ED-Elections Division; BPD-Business and Public Filings; GF-Govt Filings; BA-Boarder Affairs; LG-Legal; GR-Govt Relations; CM-Communications, ADV-Advisory.

B Administration / Special Projects of the Internal Audit Function (Ave 15%)

C Based on maximum annual accrual (vacation & sick) for 12 months

D Available Hours: (261 working days X 8 hrs./day) - (11 holidays X 8 hrs. / day) = 2,000 total Audit hours.

E Detailed objectives will be formalized for each engagement during the planning process.

F Internal Auditors are required by professional standards to obtain forty hours of Continuing Professional Education (CPE) each year.

G Required by professional standards.

TEXAS SECRETARY OF STATE

Annual Internal Audit Plan Fiscal Year 2026

November 2025

Plan Approved:

Jane Nelson
Secretary of State

Date

Dave Nelson
Deputy Secretary of State

Date

Darrell Carter, CPA, CIA, CRMA
Internal Auditor, Secretary of State

Date