



**Texas Lottery Commission  
Internal Audit Services  
FY 2025  
Annual Internal Audit Plan**



**McConnell Jones**  
Diverse Thinking | Unique Perspectives

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# McConnell Jones

August 7, 2024

The Honorable Greg Abbott, Governor  
Members of the Legislative Budget Board  
Members of the Sunset Advisory Commission  
Internal Audit Coordinator, State Auditor's Office

Dear Ladies and Gentlemen:

Attached is the FY 2025 Internal Audit Plan for the Texas Lottery Commission (TLC) approved by TLC's Commissioners on August 6, 2024. The Annual Internal Audit Plan will enable the TLC to comply with the Texas Internal Auditing Act, Texas Government Code Chapter 2102 as amended by House Bill 2485 during the 78th Legislature and House Bill 16 during the 83rd Legislature. McConnell & Jones LLP (MJ) will execute this annual audit plan in accordance with The Texas Internal Auditing Act, The Institute of Internal Auditors' (IIA) International Standards for the Professional Practice of Internal Auditing, the IIA's Code of Ethics, and Generally Accepted Government Auditing Standards (GAGAS).

Please contact Darlene Brown at 512.828.3218 or Chairman Robert G. Rivera at [Robert.rivera@lottery.state.tx.us](mailto:Robert.rivera@lottery.state.tx.us) if you should have any questions about this audit plan.

Sincerely,

Darlene Brown, CIA, CFE  
Partner



## **1.0 COMPLIANCE WITH TEXAS GOVERNMENT CODE, SECTION 2102.015: POSTING THE AUDIT PLAN AND ANNUAL REPORT ON THE INTERNET**

Texas Government Code, Section 2102.015, requires state agencies and institutions of higher education to post agency internal audit plans and internal audit annual reports to the agency's website within 30 days of approval. Texas Government Code, Section 2102.015, also requires agencies to update the posting on the website to include a detailed summary of any weaknesses, deficiencies, wrongdoings, or other concerns raised by the audit plan or annual report and include a summary of the actions taken by the agency to address the issues raised.

In accordance with requirements of Texas Government Code, Section 2102.015, MJ will provide the required internal audit plan, internal audit annual report and any other required internal audit information to the Texas Lottery Commission's Executive Director who will ensure the information is posted to the TLC's website.

## **2.0 PURPOSE**

The purpose of this document is to communicate the annual risk-based audit plan as approved by the TLC's Commissioners, the methodology used to develop the annual audit plan, the timing and resource requirements necessary to complete the audit plan.

The Annual Internal Audit Plan was developed based on a prioritization of the audit universe, updating the prior years' risk assessment, input from the TLC leadership team, Commissioners and guidance provided by the State Auditor's Office (SAO). Using our risk assessment framework, we identified the organizational sources for potential engagements and auditable activities; examined organizational risk factors; evaluated the proposed engagements; and prioritized the audits based on the risk rating.

## **3.0 RISK ASSESSMENT**

Risk is defined as the possibility of an event occurring that will have an impact on the achievement of objectives. Risk is measured in terms of impact and likelihood. An organization's risk exposure is determined through the identification of risks and evaluating the impact on operations and likelihood of occurrence.

Risk assessments identify an organization's exposure to business disruptions and barriers to achieving the organization's strategic goals. They serve as a tool to focus limited resources to perform evaluations of controls that are in place to limit the exposure.

In accordance with Texas Internal Auditing Act and The Institute of Internal Auditors (IIA) Standard 2010.A1, this internal audit plan is based on a documented risk assessment and input of the TLC leadership team and Commissioners. Our assessment evaluated risk exposures relating to the TLC's governance, operations, and information systems regarding the reliability and integrity of financial and operational information; effectiveness and efficiency of operations; safeguarding of assets; and compliance with laws, regulations, policies and procedures, and contracts.

The types of risk exposure relevant to the TLC are:

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- *Financial Exposure:* Financial exposure exists whenever an audit area is susceptible to errors or defalcations that affect the general ledger and financial statements or the integrity and safekeeping of agency assets, regardless of the financial statement impact.
- *Compliance Exposure:* Compliance exposure exists whenever an event in an audit area could cause the agency to fail to comply with regulations mandated by state or federal authorities, irrespective of whether financial exposure exists.
- *Information Exposure:* An information exposure exists whenever there is information of a sensitive or confidential nature, which could be altered, destroyed, or misused.
- *Efficiency Exposure:* An efficiency exposure exists whenever agency resources are not being utilized in an effective or efficient manner.
- *Human Resource Exposure:* A human resource exposure exists whenever an area is managing human resources in a way, which is contrary to agency policy.
- *Environmental Exposure:* An environmental exposure exists whenever internal or external factors pose a threat to the stability and efficiency of an audit area. Examples of factors that affect environmental exposure are:
  - Recent changes in key personnel
  - Changing economic conditions
  - Time elapsed since last audit
  - Pressures on management to meet objectives
  - Past audit findings and quality of internal control
- *Public Service Exposure:* A public service exposure exists whenever an event in an audit area could jeopardize existing public services or new public services.
- *Reputational Exposure:* A reputational exposures exists whenever an event in the audit area could jeopardize the reputation of the agency and stakeholder trust.

MJ discussed the Agency's risk exposures with the TLC's leadership team and Audit Subcommittee members. We then updated the Annual Internal Audit Plan based upon current risks facing TLC operations.



#### 4.0 FY 2025 ANNUAL AUDIT PLAN

MJ will conduct seven scheduled audits, one consulting engagement, update the risk assessment, conduct prior audit finding follow-up activities, prepare the FY 2026 Annual Internal Audit Plan and prepare the FY 2025 Internal Audit Annual Report in accordance with the Texas Internal Auditing Act. These activities are estimated to require **2,070 hours**. The planned audits, timing and estimated hours are summarized in the table below. MJ will work with TLC leadership on the timing for each audit.

##### FY 2025 Annual Internal Audit Plan Activities

Audit Activity #	Description	Risk Rating	Estimated Timing	Estimated Hours
1	Advertising Operations <ul style="list-style-type: none"> <li>Advertising Budget</li> <li>Contract Management</li> <li>Branding and Promotion Activities</li> <li>Partnerships</li> </ul>	High	September 2024– November 2024	230
2	Information Technology Software Systems Development Lifecycle Advisory Engagement <ul style="list-style-type: none"> <li>Internally Developed Software</li> <li>Lottery Operator Developed Software for Texas</li> </ul>	High	October 2024 – December 2024	304
3	Budget Function <ul style="list-style-type: none"> <li>Budget Planning</li> <li>Budget Development</li> <li>Budget Monitoring &amp; Reporting</li> <li>Budget Amendments</li> </ul>	High	January 2025 – March 2025	304
4	Rule Making Process <ul style="list-style-type: none"> <li>Need Identification</li> <li>Rule Updates</li> <li>Compliance</li> <li>Tracking</li> </ul>	High	March 2025– April 2025	168
5	Tax Collections and Annuity Payments <ul style="list-style-type: none"> <li>Tax Liability Identification, Collection, and Submission</li> <li>Annuity Payment Reserves, Tracking, and Payment</li> </ul>	High	May 2025– June 2025	212
6	Data Protection <ul style="list-style-type: none"> <li>Personal Identifiable Information (PII) Protection</li> <li>Sensitive Data Protection</li> <li>Winner Anonymity Protection</li> </ul>	High	June 2025 – July 2025	264
7	Drawings Studio <ul style="list-style-type: none"> <li>Drawing Studio Operations</li> <li>Independent Auditor Oversight and Reporting</li> </ul>	High	July 2025	116



Audit Activity #	Description	Risk Rating	Estimated Timing	Estimated Hours
8	Enforcement Operations <ul style="list-style-type: none"> <li>Staffing</li> <li>Complaint Intake and Assignment</li> <li>Complaint Tracking</li> <li>Complaint Reporting</li> </ul>	High	July 2025 – August 2025	196
9	Information System User Access <ul style="list-style-type: none"> <li>Quarterly Network Access Testing</li> </ul>	High	On-Going	87
10	Follow-Up on Prior Audit Findings	High	On-Going	32
11	Monitor Ethics Hotline	Compliance	On-Going	2
12	External Audit / Review Assistance	N/A	On-Going	2
13	Update Risk Assessment & Annual Audit Plan	Compliance	June 2025	44
14	Annual Internal Audit Report	Compliance	August 2025	9
15	Audit Communications, Committee Meetings, Project Management	N/A	On-Going	100
	<b>Total Hours</b>			<b>2,070</b>
	<b>Total Fees</b>			<b>\$295,997</b>

*Proposed audits will focus on internal controls and business processes.*

## 5.0 SIGNIFICANT INTERIM CHANGES

Interim changes to the annual audit plan may occur from time to time due to changes in management direction, objectives, business risks, timing of initiatives, and staff availability. In accordance with IIA Performance Standard 2020, MJ will communicate any significant changes of the audit plan to TLC executive management and present these changes to the TLC's Commissioners for review and approval. Notification of significant changes to the internal audit plan approved by the Commissioners will be submitted to the State Auditor's Office.

This annual audit plan was presented to the Commissioners on August 6, 2024.