



**TEXAS BOARD
OF
PARDONS AND PAROLES**

Number: BPP-POL. 141.201

Date: July 24, 2025

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Supersedes: August 22, 2024

BOARD POLICY

SUBJECT: POLICY STATEMENT ON INTERNAL AUDIT PROCEDURES

PURPOSE: To authorize the appointment of an Internal Auditor to conduct a program of internal auditing for the Texas Board of Pardons and Paroles as required by Texas Government Code Section 2102.006.

AUTHORITY: Texas Government Code, Chapter 2102. Internal Auditing.
Memorandum of Understanding Board of Pardons and Paroles and Texas Board of Criminal Justice, Office of the Independent Auditor TDCJ Internal Audit Division executed on 05/15/2025 by Marsha Moberley, Presiding Officer, Texas Board of Pardons and Paroles, and Eric J.R. Nichols, Chair, Texas Board of Criminal Justice.

POLICY: It is the policy of the Texas Board of Pardons and Paroles (Board) that the Texas Board of Criminal Justice (TBCJ) Internal Audit Division will serve, through a Memorandum of Understanding, as the Internal Auditor for the Board. The Internal Auditor will remain under the supervision of the TBCJ with unrestricted access to the Presiding Officer.

Concerning audits that are the subject of this policy, the Internal Auditor will report directly to the Board. The Internal Auditor will assist the Board by furnishing independent analyses, appraisals, and recommendations concerning the adequacy and effectiveness of the Board's system of internal controls, policies, and procedures, and the quality of performance in carrying out assigned responsibilities.

At the time and in the manner provided by the State Auditor, the Board shall post on its website all internal audit plans approved by the Board as well as the Internal Auditor's annual report. The Board shall update the posting as required and in the manner provided by the State Auditor to include a detailed summary of the weaknesses, deficiencies, wrongdoings, or other concerns, if any, raised by the audit plan or annual report. Furthermore, the Board shall update the posting to include a summary of the action taken by the Board to address the concerns, if any, that are raised by the audit plan or annual report.

PROCEDURE:

- I. The Internal Auditor is authorized to conduct both financial and performance audits which assess and identify improvements to the Board's system of internal controls so that the Board may have the assurance it is:
 - A. Maintaining accurate, reliable, timely, complete, and useful information;
 - B. Complying with applicable policies, plans, procedures, laws, regulations, and contracts;
 - C. Adequately safeguarding assets;
 - D. Economically and efficiently employing resources; and
 - E. Achieving established goals and objectives as planned.
- II. The Internal Auditor shall:
 - A. Prepare and present to the Board for approval an annual audit plan, using risk assessment techniques, which identifies individual audits to be conducted during the year;
 - B. Oversee the conduct of audits as specified in the Board approved annual audit plan, with any deviations from the plan documented and communicated to the Board at the next regular meeting;
 - C. Oversee the preparation of audit reports in the format determined by the Chief Audit Executive and provide these reports to each Board Member and any other designated Board personnel;
 - D. Conduct quality assurance reviews in accordance with professional standards and ensure that the internal audit program conforms to the Global Internal Audit Standards and the Code of Ethics by the Institute of Internal Auditors, and the generally accepted government auditing standards promulgated by the comptroller general of the United States Government Accountability Office governmental auditing standards;
 - E. Prepare an annual audit report on the activities of the Internal Auditor and the responses of the departments to the recommendations made by the Internal Auditor, in the format prescribed by the State Auditor's Office, and submit the report before November 1st of each year to the Governor, the Legislative Budget Board, the Sunset Advisory Commission, the State Auditor, the Board, and other Board personnel as appropriate;

- F. Report to the Board on other matters as required; and
 - G. Refer to the State Auditor's Office or the TBCJ Inspector General those audit issues which, in the opinion of the Internal Auditor, warrant consideration of an investigation for acts or allegations of impropriety, malfeasance, or nonfeasance in the obligation, expenditure, receipt, or use of state funds, or onto specified financial transactions or practices that may involve such impropriety, malfeasance, or nonfeasance.
- III. The Internal Auditor's recommendation for the annual audit plan shall be approved by the Board in a scheduled Board meeting.
- IV. Free of Impairments
- The Office of the Independent Auditor director and staff shall be free of all operational and management responsibilities that would impair their ability to review independently all aspects of the Board's operations. The work of the Office of the Independent Auditor in no way relieves Board staff of their assigned duties and responsibilities.

ADOPTED BY MAJORITY VOTE OF THE BOARD ON THE 24TH DAY OF JULY, 2025.

MARSHA MOBERLEY, PRESIDING OFFICER (CHAIR)

**Signature on file.*