

An Audit of the Academic and Health Affairs (AHA) Program Approval Process

The AHA Division complied with requirements for Ph.D.
program approvals.

July 2025

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Executive Summary

Conclusion

The Texas Higher Education Coordinating Board (THECB) Academic and Health Affairs (AHA) Division complies with requirements relating to Ph.D. program approvals. The AHA Division approved new programs in accordance with applicable statutes, rules, and regulations. In addition, the AHA Division ensured all desk reviews and site visits were conducted by contractors who are disciplinary experts in their respective fields.

The specific requirements that Internal Audit considered during this review of the AHA Division include:

Title	Requirements
Texas Administrative Code (TAC), Title 19, Part 1, Chapter 2, Subchapter A, Rule §2.143	Establishes the procedures and requirements for agency rulemaking within the THECB. Governs how rules are proposed, reviewed, and adopted.
Texas Administrative Code (TAC), Title 19, Part 1, Chapter 2, Subchapter A, Rule §2.5	Outlines the authority and responsibilities of the THECB in overseeing higher education, including planning, coordination, and administration of statewide policies.
Texas Administrative Code (TAC), Title 19, Part 1, Chapter 2, Subchapter G, Rule §2.146	Sets requirements for selecting and approving contractors who provide services or participate in programs administered by THECB, ensuring contractor qualifications meet applicable state standards.

Internal Audit identified and communicated opportunities to improve existing processes to agency management.

Appendix A: Objective, Scope, Criteria, and Methodology

Audit Objective

Does the agency comply with academic program approval requirements?

Audit Scope

All payments made to AHA contractors from June 1, 2023, through December 31, 2024.

Criteria

We used the following criteria to evaluate the information provided:

- TAC Title 19 Part 1 Chapter 2
Subchapter A Rule §2.143
- TAC Title 19 Part 1 Chapter 2
Subchapter A Rule §2.5
- TAC Title 19 Part 1 Chapter 2
Subchapter G Rule §2.146

Methodology

To accomplish the audit objective, we:

- Interviewed Academic Health Affairs division staff.
- Reviewed selected rules and requirements.
- Reviewed invoices, desk reviews/site visit reports, contracts, and planning notifications.
- Assessed compliance with TAC, internal policies, and the DIR Security Controls Catalog.

We conducted this audit in accordance with generally accepted government auditing standards and the *International Standards for the Professional Practice of Internal Auditing*. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

Appendix B: Background Information

The AHA Division's Ph.D. approval process has evolved following significant changes that were implemented effective June 1, 2023. This update formalized requirements for institutions to submit a planning notification at least one year before the full proposal for new doctoral programs. Following this notification, a 30-day comment period allows for feedback from other institutions. The THECB then conducts a thorough review of the detailed proposal before the THECB Board makes the approval decision.

This audit was included in the FY 2025 Internal Audit Plan to assess the agency's compliance with applicable requirements. Currently, the process to receive approval of a new Ph.D. program requires desk and site reviews of the proposed program. The desk review is an initial assessment of the submitted doctoral program submitted by an external expert whose primary purpose is to evaluate the completeness, clarity, and academic rigor of the proposal before the site visit. The reviewer assesses whether the proposal provides sufficient information to make an informed judgment about the program's potential quality and viability. The site visit provides an opportunity for the reviewers to interact directly with faculty and administration to gather more in-depth information and to discuss questions arising from the desk review.

1. This audit focused on the AHA Academic Approval Process for new Ph.D. programs. Universities are required to submit their initial planning notification at least a year before the full proposal.
2. Following the notification, a comprehensive program proposal detailing curriculum, faculty resources and needs is submitted to the THECB.
3. The THECB conducts a thorough review involving internal staff and external experts (desk reviews/site visits).
4. The proposal is reviewed by the Committee on Academic and Workforce Success (CAWS).
5. THECB Board makes final decision on approval.

Appendix C: Distribution List

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