



The University of Texas Medical Branch
Audit Services

Audit Report

Nursing Licensing and Certification Audit

Engagement Number MBG25AS0014

December 2025

The University of Texas Medical Branch
Audit Services
301 University Boulevard, Suite 4.100
Galveston, Texas 77555-0150

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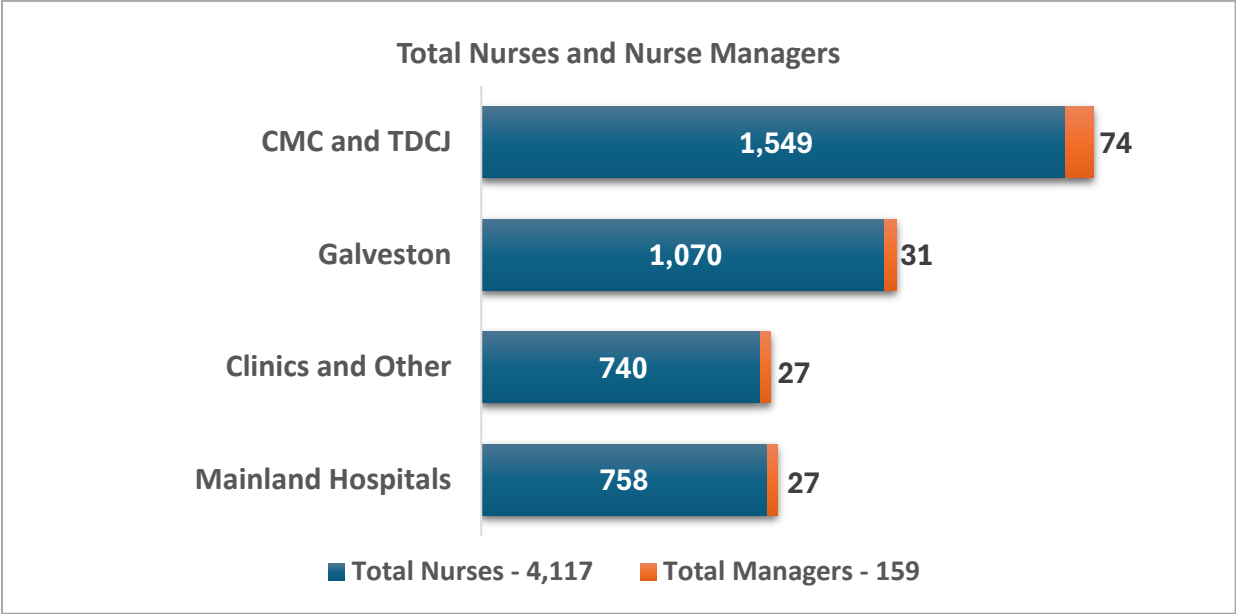
Background

The Nursing Licensing and Certification audit was included in the Fiscal Year 2025 Audit Plan with the goal of evaluating the internal controls related to nursing licensing and certifications management at the University of Texas Medical Branch (UTMB Health).

In Texas, the Board of Nursing (BON) administers all nurse licensing and registration under the authority of the Nursing Practice Act. Their process is designed to confirm that every nurse has met accredited education standards, achieves a passing score on the National Council Licensure Examination (NCLEX), and completes required continuing education hours for renewal. In addition to professional licenses, UTMB Health requires certain non-credential certifications, such as Basic Life Support (BLS) and Advanced Cardiovascular Life Support (ACLS) for designated nursing roles.

UTMB Health relies on this framework to ensure only qualified nurses are supporting patients.

Employees are responsible for maintaining all required licenses and certifications and ensuring their credentials are accurate and current in their employment records. Nurse Managers play a critical role by verifying that no staff member works with expired credentials and by taking immediate corrective action if a lapse occurs. Human Resources Employee Relations generates tracking reports from the LicenseManager Pro system, enabling departments to monitor credential status and maintain workforce readiness



UTMB Health employs 4,117 licensed nurses, including nurses with a Bachelor of Science in Nursing (BSN), Licensed Vocational Nurses (LVNs), and Registered Nurses (RNs) across its

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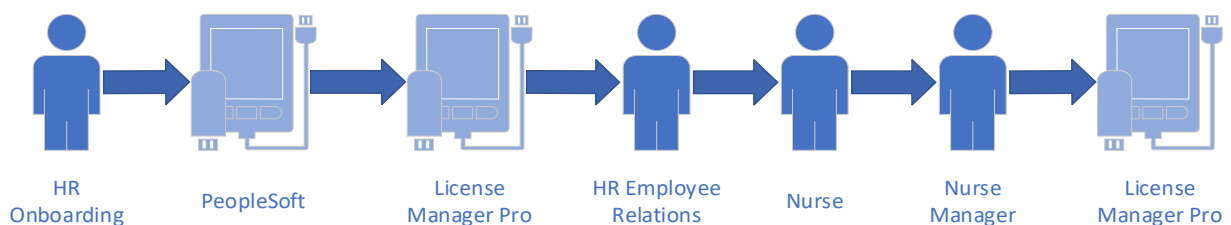
campuses, representing a diverse and highly skilled clinical workforce. There are also 159 Nurse Managers responsible for tracking and maintaining certification records, ensuring that all nursing staff meet role-specific requirements and remain compliant with institutional and regulatory standards.

LicenseManager Pro, a third-party management system provided by Precheck, is utilized to manage nursing licenses and certifications. This platform supports compliance efforts across all UTMB Health facilities by enabling real-time tracking of nurse license and certification status, automated alerts for upcoming expirations, and reporting capabilities that assist Human Resources and departmental liaisons in maintaining accurate and timely records.

Credentialing requirements at UTMB Health are governed by the Institutional Handbook of Operating Procedures (IHOP) Policy 09.11.01, which outlines standards for healthcare professionals. At the time of hire, Human Resources verifies credentials through Precheck and stores all license documentation within LicenseManager Pro.

Non-credential certifications are not verified through automated systems but are manually uploaded into the LicenseManager Pro's platform by department nurse managers. Managers are responsible for collecting documentation from employees and ensuring certification records are current and accurately reflected in LicenseManager Pro. Although these certifications are not governed by licensing boards, they are essential for clinical competency and compliance with role-specific requirements.

Below demonstrates the flow of information between systems and personnel to maintain accurate licensing and certification records in LicenseManager Pro:



Objective, Scope, and Methodology

The audit was conducted to evaluate whether controls and processes related to nursing licensing and certifications at UTMB Health are properly designed, implemented, and followed to ensure compliance with university policies and regulatory requirements. The scope of the audit was current internal controls pertaining to licensing and certifications. Our methodology included the following procedures:

- Utilized data analytics on 100% of nurse credential records to validate Primary Source Verification and confirm all certifications were active, with no expirations or suspensions.

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- Detail reviewed credentialed and non-credentialed nurses to verify license compliance and maintenance.
- Assessed internal controls in HR and Nursing Administration for oversight of licenses and certifications.
- Evaluated LicenseManager Pro’s reporting and notification features for timely compliance updates.
- Verified access to LicenseManager Pro is restricted to authorized users with appropriate permissions.

Executive Summary

UTMB Health uses LicenseManager Pro to support nurse licensing and certification management through automated alerts, credentialing policies, and collaborative verification processes. However, the existing approach lacks a unified structure, placing a heavy manual burden on nurse managers. These managers must routinely review credential records, track expiration dates, and ensure documentation accuracy without streamlined support. This fragmented process creates a cascading effect: manual workflows lead to data integrity issues, which compromise reporting accuracy and increase regulatory risk and administrative overhead across the organization. The absence of centralized oversight allows these problems to persist and compound over time.

Our review identified opportunities to strengthen certification maintenance, tracking practices, and system access controls. Current procedural inconsistencies and inefficiencies have resulted in inaccurate records caused by outdated entries, inconsistent workflows, and flawed reporting—manifesting as inflated expiration reports and missing documentation. Furthermore, all LicenseManager Pro users currently have unrestricted access to the system, with no formal review process or role-based permissions in place. To address these challenges, we recommend establishing a centralized and structured certification management process, cleaning up obsolete and inaccurate data to restore database integrity, and implementing role-based access governance to enhance security, reduce risk, and improve accountability. These measures will streamline workflows, alleviate administrative burdens on nurse managers, and strengthen compliance across the organization.

Detailed Results

Decentralized Certification Management

Nurse managers across UTMB Health are responsible for entering non-credentialed certifications into LicenseManager Pro. These certifications are specific to the employee’s job duties and are designated based on job codes. On average each patient care professional will need 3-5 different certifications in addition to their license and the nurse manager is responsible for monitoring the compliance of these certifications. The current state of certification management relies on a

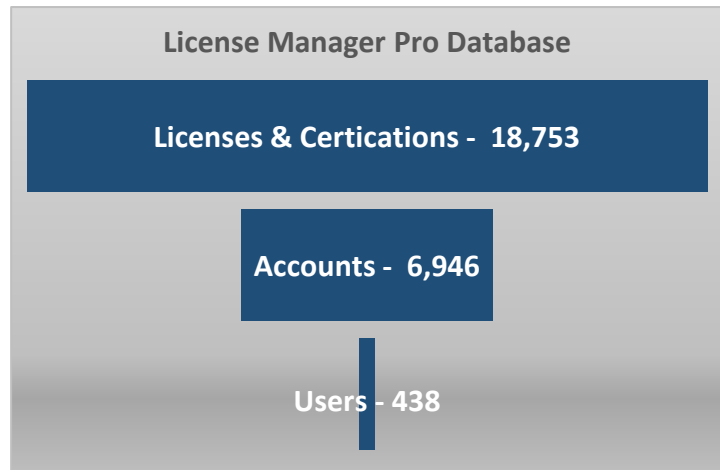
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decentralized system. This means that 400+ individual users, nurse managers and/or administrative staff, are independently responsible for overseeing and updating the certification records for all licensed nurses, which collectively involve over 18,000 records.

There are no standardized, organization-wide protocols or consistent guidelines for how these updates should be handled, leading to varied and informal processes across different departments or units.



Recommendation 001 High – Centralized Nurse License and Certification Monitoring:

Nurse Administration Management should coordinate with Human Resources to implement a centralized process for managing nursing certifications within LicenseManager Pro. The process should clearly define roles and responsibilities for each step of the certification process.

Management’s Response: Nursing Administration and Human Resources will review current process workflow and software capabilities and identify any gaps or limitations of LicenseManager Pro . This review may provide evidence of a need for a new vendor solution.

Additionally, Nursing Administration and Human Resources will conduct a review of roles and responsibilities within the non-credentiable certification monitoring process for those individuals responsible for data entry/access. The roles and responsibilities will be clarified and/or reduced to support process improvements.

Responsible Party: Vice President, Human Resources and Vice President & System Chief Nursing Executive

Implementation Date: January 31, 2026

Nurse Managers must input the renewed certification into the LicenseManager Pro database. This process relies on a decentralized submission process and manual data entry. Different departments follow informal, inconsistent update processes and required certification documents are not consistently uploaded. As a result, the database contains outdated licenses, expired certifications, and certifications with insufficient documentation attached. Duplicate or

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obsolete records accumulate over time and outdated certifications remain visible in the expiration lists.

Recommendation 002 High – Nurse License and Certification Recording Processes:

Nurse Administration Management should coordinate with Human Resources to implement standardized protocols for data entry, documentation uploads, record updates, and removal of obsolete entries. This should also include a standardization and centralized submission process for nurses to report their updated certifications with appropriate documentation.

Management’s Response: Nursing Administration and Human Resources will partner to update and/or create necessary Standard Operating Procedures along with training documents to promote consistency in process implementation for current and new HR and Nursing users.

Responsible Party: Vice President, Human Resources and Vice President & System Chief Nursing Executive

Implementation Date: February 28, 2026

Database Integrity and Reporting

The database holds records for certifications no longer in use or monitored by UTMB Health, i.e. the National Professional Development Certification (NPDC) certification which is no longer a required part of any job code accounts for 1,385 records. Inaccurate data creates an inability to rely on LicenseManager Pro’s reporting tools to track and monitor licenses and certifications.

Outdated and duplicate records in LicenseManager PRO distort expiration reports and obscure the true compliance status. Reporting tools do not flag missing documentation, and audit testing showed one in five nurses had incomplete records. Without monitoring checks, incorrect data remains in the system, reducing reliability. The audit identified 1,892 entries marked as expired or missing licenses. These inconsistencies appear to stem from legacy data that was never properly archived or updated within the reporting system.

Recommendation 003 Medium – Removal of Current Obsolete Entries:

Human Resources and Nursing Administration should work together to remove obsolete license entries and update legacy data within LicenseManager Pro’s reporting platform to ensure consistency between reported license statuses and employee credentials. Additionally, they should work with Precheck to implement edit checks and drop down options within the system to prevent duplication of certifications and reduce the potential for manual entry errors.

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Management's Response: Human Resources will run a LicenseManager Pro report to identify outdated and duplicative information that should be archived. Any technology control to minimize duplication and automate archival will depend on the LicenseManager Pro functionality analysis outlined in Recommendation 001.

Responsible Party: Vice President, Human Resources and Vice President & System Chief Nursing Executive

Implementation Date: January 31, 2026

User Permissions within LicenseManager Pro

System access to LicenseManager Pro must be regularly reviewed and aligned with users' job responsibilities, with privileges restricted to the minimum necessary. However, data analytics and stakeholder interviews revealed that all users currently have full edit rights, with no role-based restrictions such as view-only or delete limitations. Although access is generally department-specific, there are no system controls to enforce these boundaries. The absence of a formal access review policy and designated ownership has resulted in a manual, inconsistent process. Unrestricted permissions and outdated access roles increase the risk of unauthorized changes, regulatory non-compliance, and lack of accountability for system activity.

Recommendation 004 Medium – User Permissions within LicenseManager Pro:

Management should implement formal access control procedures within LicenseManager Pro to ensure user permissions are appropriately assigned, reviewed, and maintained. This includes:

- Establishing defined access roles with appropriate edit/view restrictions based on job responsibilities.
- Conducting periodic reviews of user permissions to identify and remove unnecessary access.
- Assigning ownership for access management and developing formal policies for granting, modifying, and revoking permissions.
- Implementing oversight mechanisms to monitor compliance with access protocols.

Management's Response: Human Resources will run a LicenseManager Pro report of existing users and their permissions and make changes to user access (e.g. view only, update/edit, etc.) as appropriate for their role. Human Resources will also inactivate any users who no longer have role in the non-credentiable certification monitoring process.

Nursing Administration and Human Resources will develop an approval process for individuals who will get future access and at what level.

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Nursing Administration and Human Resources will develop an internal self-audit schedule and review process to ensure accuracy of controls.

Responsible Party: Vice President, Human Resources and Vice President & System Chief Nursing Executive

Implementation Date: March 1, 2026

Conclusion

We greatly appreciate the assistance provided by the Human Resources and Nurse Managers and hope that the information presented in our report is beneficial.

This audit was conducted in conformance with The Institute of Internal Auditors' *Global Internal Audit Standards*. Additionally, we conducted the audit in accordance with the Generally Accepted Government Auditing Standards. 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 on our audit objectives.

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Observation Ratings

Priority	An issue that, if not addressed timely, has a high probability to directly impact achievement of a strategic or important operational objective of the University or the UT System as a whole.
High	An issue considered to have a medium to high probability of adverse effects to a significant office or business process or to the University as a whole.
Medium	An issue considered to have a low to medium probability of adverse effects to an office or business process or to the University as a whole.
Low	An issue considered to have minimal probability of adverse effects to an office or business process or to the University as a whole.

Report Date:

December 10, 2025

Report Distribution:

To: Philesha Evans, Vice President Human Resources
 Jerry Mansfield, Vice President and System Chief Nursing Executive

Cc: Dr. Jochen Reiser, President and Chief Executive Officer
 Dawn Wright, Senior Vice President & Chief Human Resources Officer
 Wayne Keathley, Executive Vice President and Chief Operating Officer Clinical Enterprise
 UTMB Health Institutional Audit Committee