

The logo for UCIrvine, featuring the letters 'UCIRVINE' in a large, black, serif font. The 'U' and 'C' are connected, and the 'I' is a thin vertical line. The 'R' and 'V' are also connected. The 'I' and 'R' are connected, and the 'V' and 'I' are connected. The 'N' and 'E' are connected. The logo is set against a light beige background.

UCIRVINE

The logo for Internal Audit Services, featuring the words 'INTERNAL' and 'AUDIT SERVICES' in a black, serif font, stacked vertically. The logo is set against a light beige background.

INTERNAL  
AUDIT SERVICES

## Required Training

*Internal Audit Report No. I2024-102*

May 12, 2025

***Prepared By***

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***Reviewed By***

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***Approved By***

Mike Bathke, Director

May 12, 2025

**RAMONA AGRELA  
VICE CHANCELLOR & CHIEF HUMAN RESOURCES OFFICER  
HUMAN RESOURCES**

**RE: Required Training Compliance Audit  
Report No. I2024-102**

Internal Audit Services performed a review of the Required Training Compliance, and the final report is attached.

We extend our gratitude and appreciation to all personnel with whom we had contact while conducting our review. If you have any questions, please do not hesitate to contact me.

Sincerely,



Mike Bathke  
Director

Attachment

C: Audit Committee  
Julie Lance, Senior Director of Strategic and Business Services, Human Resources

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## I. MANAGEMENT SUMMARY

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In accordance with the fiscal year (FY) 2023-2024 audit plan, Internal Audit Services (IAS) conducted a focused review of the processes and controls around required training for Campus and UCI Health (UCIH) employees to determine if current business practices in tracking and monitoring training compliance were adequate, efficient, and effective. The review disclosed that appropriate internal controls, monitoring mechanisms, and oversight procedures were not established or implemented to promote best business practice or define enforcement terms to ensure timely compliance. Specifically, the following key issues were observed:

**Cash Handling Training – Campus** – Training was not developed and provided to 168 cash handlers employed in 109 Campus departments as required by University policy, BUS-49. This observation is discussed in section V.1.

**Cash Handling Training – UCI Health** – The cash handling training compliance report for UCIH employees was reviewed and 47 employees had not completed the training by their due dates. However, the report was found to be incomplete and inaccurate due to system glitches, rendering it unreliable for this review. This observation is detailed in section V.2.

**Nurse Training** – Several training courses assigned to Clinical Nurse II by UCIH leadership or by UCIH Compliance & Privacy Office were not included in the training compliance report. In addition, several nurses were not identified in the compliance report. Due to these inaccuracies, the compliance rates for required nurse training are deemed unreliable for this review. This observation is further discussed in section V.3.

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## II. BACKGROUND

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University required training courses are tailored to each employee's role and position based on legal, regulatory, and policy requirements. These courses are assigned to faculty and staff by various University entities, such as the Compliance Office, division, and/or department leadership, as well as subject matter experts including, but not limited to, Nursing Quality, Research and Education, Human Resources, Environmental Health & Safety, etc. The majority of required training courses are assigned to employees at the beginning of each fiscal year through the UC Learning Center (UCLC), an online learning management system that manages mandatory, required, and optional training for UC system employees.

Human Resources (HR) does not oversee Campus or UCIH required training compliance. However, HR provides compliance reports to designated Campus or UCIH point-of-contacts upon request.

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### III. PURPOSE, SCOPE, AND OBJECTIVES

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The purpose of this audit was to review the currently established business practices and processes for monitoring and tracking required training compliance. The scope included a focused review and sampling of required training compliance for Campus and UCIH cash handlers as well as clinical nurses.

For testing purposes, IAS included the following objectives:

1. Obtain, review, and assess business practices and processes implemented to ensure employees complete required training in a timely manner.
2. Select and review sample required training to determine employee compliance rates for timeliness.
3. Determine if current business practices and processes implemented to track, monitor compliance are adequate, efficient, and effective.
4. Determine if current business practices and processes for the oversight of required training are adequate, efficient, and effective.
5. Determine if non-compliant employees were properly and timely followed up on and/or subject to appropriate disciplinary, corrective, or administrative actions.

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### IV. CONCLUSION

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IAS observed a yearly increase in the number of incomplete required training courses over the past three years. However, discrepancies in the required training compliance reports, due to UCLC system glitches, rendered the training compliance rates unreliable. Additionally, IAS noted inconsistencies in management's monitoring and tracking of required training. These inconsistencies were attributed to a lack of guidelines establishing best business practices and defined rules for enforcement.

IAS discussed these observations with management, who formulated action plans to address the issues. The details are presented below.

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### V. OBSERVATIONS AND MANAGEMENT ACTION PLANS

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#### 1. Cash Handling Training – Campus

##### Background

University of California Office of the President (UCOP) Policy for Cash and Cash Equivalents Received, BUS-49, Section IX.15 states:

- "Campuses will develop and deliver cash handling training to all employees who handle cash."
- Training will be offered: "When a new employee commences work in a cash handling job. At least once per year for all cash handling employees to refresh knowledge concerning policies, procedures and techniques and to provide updated information on internal and external policies."

### Observation

Based on a review of the cash handling training compliance report provided by HR and lists of cash handlers provided by Accounting & Fiscal Services:

1. Cash handling training was not developed and provided to 168 cash handlers employed in 109 Campus departments as required by University policy, BUS-49.
2. In the last three fiscal years, only two campus employees were assigned to the cash handling training, an eCourse in UCLC, developed by the UCIH Cashier's Office in 2018.

Required training provides essential fundamentals and procedures that enable departments and units to establish appropriate business processes and implement effective procedures to reduce potential risks for errors or theft.

### Management Action Plan

1. Financial Services will develop a Cash Handling Training course and make it available in UCLC.
2. Financial Services will notify via email all cash handlers employed in campus departments that they are required to complete the UCLC training course.

**Due Date:** July 31, 2025

Completed management action plan on May 2, 2015, no further follow-up is necessary.

## 2. Cash Handling Training – UCI Health

### Background

UCOP Policy for Cash and Cash Equivalents Received, BUS-49, Section IX.15 states:

- "Campuses will develop and deliver cash handling training to all employees who handle cash."

- Training will be offered: "When a new employee commences work in a cash handling job. At least once per year for all cash handling employees to refresh knowledge concerning policies, procedures and techniques and to provide updated information on internal and external policies."

In 2018, UCIH Cashier's Office developed an eCourse titled Cash Collections and Deposits (CCD) in UCLC. Prior to 2018, the Cashier's Office provided in-person training.

### Observation

IAS conducted a review to determine the required training compliance rates for UCIH cash handlers and to assess the completeness and accuracy of the cash handling training compliance report provided by HR on May 16, 2024. The review highlighted the following findings:

1. The Cashier Manager identified 618 UCIH cash handlers as of June 2024. However, the HR training compliance report accounted for only 435 of the 618 cash handlers, while listing a total of 603 cash handlers overall. In addition, the HR report did not include the Cashier Manager and several other cash handlers. However, the UCIH Cashier Manager generated a report on July 31, 2024, which showed she had completed the required training on February 15, 2024.
2. According to the HR training compliance report, 47 employees had not completed the training before their due dates (July 24, 2019, through May 10, 2024). However, due to the discrepancies noted above, the accuracy of the training compliance rate is not reliable for this report and for proper monitoring and tracking.

An accurate and comprehensive compliance reporting is crucial for effective oversight, monitoring, and tracking of training compliance.

### Management Action Plan

UC Irvine Human Resources (HR) will:

1. Communicate with content owners to ensure their compliance reporting parameters are current and accurate, making necessary adjustments as needed.
2. Assess UCLC for configuration limitations and report findings to UCOP, the system owners.
3. Evaluate the feasibility of decentralizing UCLC to allow content owners direct access for:
  - Configuring their training courses,
  - Defining target audiences, and

- Managing compliance reporting.

**Due Date:** 11/30/2025

### 3. Nurse Training

#### **Background**

Annual training consists of mandatory courses based on legal and/or regulatory requirements, UC system requirements, and those determined by UCI Compliance and UCIH and UCI School of Medicine leadership. All UCIH and UCI School of Medicine faculty and staff are required to complete these annual training courses. Assigned courses vary based on role and are assigned at the beginning of each fiscal year in UCLC, a learning management system for both mandatory and optional training for UC system employees.

#### **Observation**

IAS conducted a review to determine the required training compliance rates for Clinical Nurse II (CNII), who work with patients or have exposure to biological agents. The review also assessed the completeness and accuracy of the required training compliance report provided by HR. The review highlighted the following findings:

1. The compliance report did not capture all the required training courses assigned to CNII. The following required training courses were missing from the compliance report:
  - Nine of 14 required training courses assigned by UCIH leadership
  - None of the five training courses assigned by Compliance & Privacy Office
2. The compliance report did not capture all active CNII that were assigned to complete the required training courses. A sample review of CNII employed in three departments with payroll payments for seven months or more disclosed the following number of CNII were not identified in the compliance report:
  - Four of 79 CNII in Operating Room
  - Five of 99 CNII in Surgical Intensive Care Unit
  - Two of 224 CNII in the Emergency Department

HR attributed these inconsistencies to leave of absence and recent position changes.

3. Analysis of the compliance report revealed a declining trend in CNII's compliance rate over three consecutive years. The table below summarizes the number of uncompleted required training courses for CNII across all UCIH departments.

Fiscal Year	Number of courses
2023-2024	3,277
2022-2023	490
2021-2022	126

Given these discrepancies, the reported training compliance rate is deemed inaccurate and unreliable for monitoring, tracking, and reporting purposes.

An accurate and comprehensive compliance reporting is crucial for effective oversight, monitoring, and tracking of training compliance.

In addressing the decline in required training compliance, Nurse Managers stated that nurses face significant challenges in completing the assigned training, whether mandatory, required, or optional. Nurse Managers have identified several key factors that, when combined, create a challenging environment for ensuring timely completion of required training.

1. Volume of training: Nurses face significant challenges in completing all assigned training. The sheer quantity of training modules can be overwhelming.
2. Time constraints: Nurse are frequently expected to complete a substantial amount of training outside their regular work hours. This expectation places an additional burden on nurses who are already managing demanding schedules.
3. Work-life balance: The requirement to complete training during personal time can negatively impact work-life balance, potentially contributing to stress and burnout among nursing staff.

The situation is particularly problematic for new hires. The current onboarding process overwhelms new hires by assigning approximately 100 courses within their first week. More alarmingly, due to the sheer volume of assigned courses, new hires are unable to complete all the required training before they begin working in their designated units. Consequently, many courses are flagged as overdue even before the new employees start their actual duties.

Nurse managers also face significant challenges in effectively monitoring, tracking, and enforcing training compliance. These challenges are compounded by several factors:

1. High staff-to-manager ratio: In SICU, each manager is responsible for overseeing the training compliance of 60 nurses.
2. Varied due dates: The assigned courses for each nurse have different due dates, creating a complex matrix of deadlines that is difficult to manage efficiently.



3. Delayed notifications: UCLC notifications for overdue courses are sent only after the due dates have passed, limiting the ability to take proactive measures.
4. Limited visibility: Managers lack advanced knowledge of deadlines, further complicating our ability to monitor compliance effectively.

### **Management Action Plan**

UC Irvine Human Resources (HR) will:

1. Communicate with content owners to ensure their compliance reporting parameters are current and accurate, making necessary adjustments as needed.
2. Assess UCLC for configuration limitations and report findings to UCOP, the system owners.
3. Evaluate the feasibility of decentralizing UCLC to allow content owners direct access for:
  - Configuring their training courses,
  - Defining target audiences, and
  - Managing compliance reporting.

**Due Date:** 11/30/2025