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April 25, 2014

**ASSISTANT VICE PROVOST AND EXECUTIVE DIRECTOR GULLATT**

**Subject: Final Audit Report Education Partnerships Youth Protection Guidelines  
Implementation – No. P14A014**

Attached please find a copy of the final report for: Audit Project No. P14A014: Education Partnerships Youth Protection Guidelines Implementation. With the issuance of this final report, please destroy any previous draft versions. We very much appreciate the assistance provided to us by you and members of your staff during our review. If you should have any questions please feel free to contact me at 510-987-9646 (email: [Matthew.Hicks@ucop.edu](mailto:Matthew.Hicks@ucop.edu)).



Matthew Hicks  
Audit Director

Attachment

cc: Senior Vice President Vacca  
Provost & Executive Vice President Dorr  
Deputy Director Hillmon  
Contractor Weiss  
Contractor Schneider

UNIVERSITY OF CALIFORNIA  
ETHICS, COMPLIANCE AND AUDIT SERVICES  
OFFICE OF THE PRESIDENT  
INTERNAL AUDIT SERVICES

EDUCATION PARTNERSHIPS YOUTH PROTECTION  
GUIDELINES IMPLEMENTATION  
Audit No. P14A014  
March 2014

Audit Conducted by:  
Laura Schneider, Contractor  
Jeffrey Weiss, Contractor

## **Executive Summary**

### **Introduction**

Education Partnerships (EP) is a department within the University of California Office of the President that manages programs with UC campuses to promote learning and increase student achievement. Programs are designed to provide UC campuses with research and tools to facilitate college access and expand post-secondary opportunities for students with the aim of closing the achievement gap.

The outreach programs sponsored by EP are intended for students from pre-kindergarten through college. EP serves nearly 135,000 students statewide in addition to a large number of parents, teachers, and administrators. As a proactive measure, in April 2013, EP instituted Youth Protection Guidelines (Guidelines) in an effort to promote continued youth safety and protection within the university and its supporting programs. Based on EP's internal assessment, Education Partnership employees do not meet the definition of a mandated reporter under the California Child Abuse and Neglect Reporting Act ("CANRA"); however, employees may encounter students during school site visits and other events. The guidelines, effective July 1, 2013, require all Education Partnership employees to be aware of mandated reporter requirements under CANRA, behavior with youth that would require reporting, and reporting protocols when inappropriate behavior is identified. In an effort to educate employees on the new Guidelines, EP developed an online Youth Protection CANRA training and conducted an in-person training with employees during a department meeting in October 2013.

### **Objectives and Scope**

As part of the fiscal year 2013 – 2014 annual audit plan, Internal Audit performed a review of the Education Partnerships Guidelines implementation. The audit objectives were to a) evaluate compliance with implementation Guidelines and b) assess Education Partnership employee awareness of the implemented guidelines to determine additional training opportunities.

As the Guidelines became effective July 1, 2013, the period under review covered July 1, 2013 – February 28, 2014.

To accomplish the audit objectives and scope as documented above, the following procedures were performed:

- Obtained and reviewed the Guidelines and Training provided to UCOP EP employees.
- Conducted interviews with the Deputy Director of College Access and Preparation, Operations Director, and Human Resources (HR) Business Partner to gain an understanding of implementation and on-going administration of the Guidelines.
- Conducted a survey with EP employees to confirm a) awareness of Guidelines and reporting requirements as a mandated reporter, b) attendance and completion of the youth protection training, and c) knowledge of youth protection resources. The survey was distributed to 55 department employees with a 92% response rate. The results of the survey are included in Appendix A.

- Selected a sample of EP employees to verify completion of a) the annual youth protection training and b) the Youth Protection Acknowledgment Form in accordance with the Guidelines.

## **Conclusion**

EP developed and implemented the Guidelines in an effort to educate employees about the requirements of mandated reporters under CANRA and promote a culture of youth protection within the department. The results of the employee survey indicate awareness of the Guidelines is high among EP personnel. However, through inquiry with Education Partnership leadership and review of survey results, we identified opportunities to strengthen employee understanding of the Guidelines, as noted below within the opportunities for improvement.

In addition, based on the audit steps performed, instances of non-compliance with the Guidelines were identified around completion of the annual youth protection training and timely completion of the Youth Protection Acknowledgment Form. Although Education Partnership leadership took immediate steps to address and resolve the instances of non-compliance with employees, additional opportunities exist going forward to strengthen protocols for monitoring completion of youth protection training by new and current employees on an annual basis.

Actions developed by EP will increase the awareness and accessibility of the Guidelines.

## Opportunities for Improvement and Action Plans

### 1. Annual Youth Protection Training not Completed by Some Employees

We noted that 5 of 15 EP employees selected for testing did not attend the inaugural youth protection trainings offered at either the GEAR UP program meeting on 8/15/2013 or the EP department meeting on 10/10/2013. In addition, we confirmed with the EP Operations Director that no documentation was received from the five employees or supervisors to evidence completion of the youth protection online CANRA training.

Per the Guidelines: *“All current UCOP EP staff must participate in Youth Protection Guidelines training, which is conducted annually during a department staff meeting [...] In addition, all new hires in Education Partnerships are required to participate in Youth Protection Guidelines training upon starting their new positions.”*

As a result of the audit, employees identified were immediately contacted and instructed to complete training online to fulfill the training requirement of the Guidelines. We obtained the Certificate of Completion to verify the employees selected subsequently completed the youth protection online CANRA training.

In addition, there does not appear to be a process in place to follow up with employees unable to attend in person youth protection trainings to verify completion through other available methods; e.g. online.

**Action Plan:** *The HR Business Partner will be responsible for tracking employee completion of the Youth Protection Guidelines training and maintaining confirmation from employees that training has been completed. Going forward, upon completion of the annual Youth Protection Guidelines training at the EP department meeting, the Operations Director will notify the HR Business Partner of employees who attended the training. For employees unable to attend the training conducted during the department meeting, the HR Business Partner will notify the employee and the employee's supervisor of the required youth protection training online. The HR Business Partner will monitor completion of training and follow up with employee and the employee's supervisor on any confirmations not received within 30 days of notification. Upon completion of the training, the employee will submit the Certificate of Completion to the HR Business Partner.*

*In addition, newly hired employees within EP will be required to complete the online youth protection training and sign the Youth Protection Acknowledgment Form as part of the onboarding process administered by HR. The HR Business Partner will be responsible for tracking employee completion of the youth protection training and acknowledgement form. In the event the training or acknowledgement form is not completed within 30 days of the employees start date, the HR Business Partner will follow up with the employee and the employee's supervisor until evidence of completion is obtained.*

**Target Date:** 10/31/2014

## 2. Youth Protection Acknowledgment Form not Completed Timely

We noted that 3 of 15 EP employees selected for testing did not sign and submit the Youth Protection Acknowledgment Form until February 2014, after the 9/1/2013 deadline per the Guidelines.

Per the Guidelines: *“Current employees without the acknowledgment in their file will be asked to sign and submit this authorization before September 1, 2013. Employees who start after this date, or who are unprepared to complete the acknowledgment, will be required to participate in training and then asked to sign the acknowledgment.”*

In addition, there does not appear to be a process in place to follow up with EP employees who do not complete the Youth Protection Acknowledgment Form.

**Action Plan:** *Newly hired employees within EP will be required to sign the Youth Protection Acknowledgment Form and complete the online youth protection training as part of the onboarding process administered by HR for new employees. The HR Business Partner will be responsible for tracking employee completion of the youth protection training and acknowledgement form. In the event the training or acknowledgement form is not completed within 30 days of the employees start date, the HR Business Partner will follow up with the employee and the employee's supervisor until evidence of completion is obtained.*

**Target Date:** *This is an event driven remediation. Therefore, upon occurrence of a new hire, the action item will be implemented.*

## 3. Improve Understanding of Youth Protection Reporting Requirements

Results of the survey conducted with EP employees suggest opportunities to improve awareness of reporting requirements for mandated reporters. In the survey, 88% of employees agreed they know the procedures for reporting suspicious or inappropriate behavior, however, only 58% correctly identified that mandated reporters must report issues directly to Child Protective Services (CPS). In addition, only 40% of employees correctly indicated that for mandated reporters, reporting the issue to an employer, supervisor, school principal or counselor is not a substitute for CPS. The survey results suggest EP employees are unclear about the expectations and procedures for reporting an issue as well as the reporting channels available for reporting an issue. Further, when asked what areas they would like additional training in, EP employees indicated scenarios of how and when to report issues would be beneficial.

**Action Plan:** *Using the survey results from the audit, EP will update the training materials for the next youth protection training scheduled for July 2014. Training will be updated to include additional content around reporting procedures. Going forward, EP will leverage the survey as an on-going tool to validate youth protection awareness and comprehension amongst employees and identify additional opportunities for training.*

**Target Date:** *10/31/2014*

#### **4. Improve Employee Access to Youth Protection Training Materials and Clarify Training Requirements**

Results of the survey conducted with EP employees suggest opportunities to improve access to youth protection training materials and resources. Noted 22% of survey respondents indicated they could not easily locate a copy of the EP youth protection training materials. Additionally, while 90% of survey respondents indicated they were aware that specific program and/or campus youth protection policies should be obtained and referred to in planning events involving youth, 27% indicated they did not know how to locate these resources. Although training materials and resources are available on the EP SharePoint site, they are not in a location easily located by employees. The department should consider re-locating materials and notifying employees of the new location via email communication or future department meeting.

Additionally, EP has identified several methods for employees to complete the required youth protection training; however, these methods are not clearly outlined to employees. Current training options utilized in FY2013-2014 include program specific training for GEAR UP employees, the EP departmental training, and online training.

***Action Plan:** The EP youth protection training materials will be moved to a more accessible location on the department's SharePoint site. Once the training materials and resources have been relocated, EP employees will be notified by the Assistant Vice Provost and Executive Director of the new SharePoint location. Additionally, a listing of training options to fulfill the requirement of the Guidelines will be published on SharePoint with the training materials.*

***Target Date:** The training materials and resources were moved to a more accessible location on the department's SharePoint site prior to issuance of the report. Communication to EP employees of the new location for training materials and resources on the department's SharePoint site will be completed by 8/31/2014. A listing of youth protection training opportunities will be posted to the SharePoint site by 8/31/2014.*

## Appendix A – Education Partnerships Employee Survey Results

### Q1. What best describes your position at Ed Partnerships?

	Response Percent
Contractor	3.9%
Analyst	31.4%
Manager	19.6%
Administrative Support	23.5%
Other	21.6%

### Q2. How long have you been working in the department of Ed Partnerships?

	Response Percent
Less than 1 year	9.8%
1 - 3 years	17.6%
3 - 5 years	25.5%
> 5 years	47.1%

### Q3. In the last year, how much interaction have you had with youth (under 18)? Interaction with youth may include communication through email, phone, or participation in events on a campus, at a high school, or with UCOP.

	Response Percent
I have not had any interaction with youth.	29.4%
Once a year	27.5%
Several times a year	21.6%
Once a month	7.8%
Once a week	5.9%
More than once a week	7.8%

### Q4. Which of the following events have you attended, hosted, or facilitated in the last year? (Please select all that apply)

	Response Percent
Seminar/workshop	45.1%
Same day field trip/college visit	11.8%
Overnight trip	9.8%
Residential programs	3.9%
I have not participated in any events.	31.4%
Other (please specify)	23.5%

### Q5. Have you completed any Youth Protection trainings in the last year?

	Response Percent
Yes	84.3%
No	11.8%
I don't know	3.9%

### Q6. Have you signed the Youth Protection Acknowledgement Form?

	Response Percent
Yes	86.3%
No	5.9%
I don't know	7.8%



**Q7. To what extent do you agree with the following statements?**

	Strongly Disagree	Disagree	Neither Agree nor Disagree	Agree	Strongly Agree
a. I believe the Youth Protection training is beneficial for someone in my position given my job responsibilities.	1	2	8	22	18
b. I am able to easily locate a copy of the Education Partnerships Youth Protection training materials.	1	3	8	23	16
c. I know the procedures for reporting a concern or complaint if I witness suspicious or inappropriate behavior between personnel and minors.	1	1	4	27	18
d. I understand the role of a Mandated Reporter.	1	2	2	25	21
e. I am able to identify red flags that would potentially require to me to report an instance of child abuse or neglect as a mandated reporter.	1	1	2	29	18
f. I am familiar with the types of contact and communication with youth that are ALLOWED by personnel working with youth (Note: if you do not work with or have not had contact with youth, please answer "Neither Agree nor Disagree")	2	2	20	14	13
g. I am familiar with the types of contact and communication with youth that are PROHIBITED by personnel working with youth (Note: if you do not work with or have not had contact with youth, please answer "Neither Agree nor Disagree")	2	1	19	16	13
h. I am aware that in planning events involving youth, I should refer to and obtain the specific program and/or campus youth protection policies.	1	0	4	29	17
i. I know how to locate the resources necessary to assist in planning events involving youth.	2	3	9	22	15

**Q8. Please respond to the following statements:**

	True	False	I Don't Know
a. UCOP Education Partnerships requires staff to participate in an annual Youth Protection training even though your job responsibilities may not meet the established definition of a mandated reporter under the California Child Abuse and Neglect Reporting	45	0	5
b. Mandated reporters encounter children through their employment.	35	10	5
c. Mandated reporters conduct investigations related to any known or suspected instances of child abuse or neglect.	7	38	5
d. Mandated reporters are required by the state of California to report any known or suspected instances of child abuse or neglect.	48	0	2
e. Mandated reporters report any known or suspected instances of child abuse or neglect directly to Child Protective Services (CPS).	29	13	8
f. Mandated reporters may report any known or suspected instances of child abuse to an employer, supervisor, school principal, or school counselor as a substitute for CPS.	25	20	5
g. Mandated reporters must be able to prove that the abuse has occurred.	0	46	4

**Q9. Which of the following are red flags for potential abuse or neglect? (Please select all that apply)**

	<b>Response Percent</b>
a. Self-abusive behavior	98.0%
b. Frightened of going home	98.0%
c. Injuries with improbable explanations	98.0%
d. Malnourishment	96.0%
e. Inappropriate sexual knowledge for age	78.0%
f. Freely interacting with others	4.0%
g. Showing injuries to others	42.0%
h. Behavioral problems such as anxiety or aggression	90.0%
i. Friendly towards others	0.0%

**Q10. Which of the following is required information when reporting an instance of suspected child abuse? (Please select all that apply)**

	<b>Response Percent</b>
a. Name of the reporter	62.0%
b. Name of the child	90.0%
c. Location of the child	78.0%
d. Nature and extent of injury	74.0%
e. What led the reporter to suspect child abuse	94.0%