

The logo for UC Irvine, featuring the letters "UCIRVINE" in a large, black, serif font. The letters are closely spaced, with "UC" and "IRVINE" being particularly prominent.The text "INTERNAL AUDIT SERVICES" in a black, serif font, arranged in two lines. A vertical line is positioned to the left of the text.

Campus Policies & Procedures

Internal Audit Report No. I2023-108A

April 26, 2023

Prepared By

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Approved By

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April 26, 2023

**TAWNY LUU
DIRECTOR OF COMPLIANCE
DIVISION OF EQUAL OPPORTUNITY AND COMPLIANCE**

**RE: Policies & Procedures – Campus Audit
Report No. I2023-108A**

Internal Audit Services performed an audit of the Campus Policies & Procedures, 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
Reina Marchi, Policy & Compliance Specialist – Division of Equal Opportunity and
Compliance

I. MANAGEMENT SUMMARY

In accordance with the fiscal year (FY) 2022-2023 audit plan, Internal Audit Services (IAS) reviewed the Campus policies and procedures (P&Ps) to determine if they are up to date and reflect existing practices in key areas, were properly and timely reviewed/approved, and all superseded policies and procedures were archived and available for review upon request.

In general, controls and processes appear to be functioning as intended. Based on the audit work performed, appropriate business processes should be established and implemented to minimize business risks, ensure compliance with University policies and procedures, and/or promote best business practices. Specifically, IAS noted the following concerns.

Policies and Procedures – Current Campus P&Ps were not properly monitored and tracked to ensure timely policy reviews and/or revisions as required by policy. These observations are discussed in section V.1.

Archived Policies – All revised policy versions were not tracked and archived as required by policy. This observation is discussed in section V.2.

Policy Holder Review – Emails from policyholders confirming that their policy was reviewed and that no revisions were necessary because the information was current were not documented as required. This observation is discussed in section V.3.

II. BACKGROUND

The Administrative Policies Office (APO) maintains the official record of campus administrative policy revisions and approvals and hosts the UC Irvine's Official University Policies & Procedures website, a centralized location for portal-like access to systemwide and Campus policy information. Copies of these documents are also sent to the Libraries Archives. Personnel Procedures for UCI Staff Members, for which Human Resources is the policyholder, are also maintained on this website.

As of this report date, policy management software, such as PolicyStat which was implemented at UCI Health in 2006, has not been procured to manage, monitor, and track Campus P&Ps. Instead, the APO has been manually managing, monitoring, and tracking 161 administrative and 36 personnel P&Ps, which makes collaboration and documenting workflows to draft, edit, review, and approve policy documents inefficient and time consuming.

IAS notes that APO management has undergone numerous changes. Less than five years ago, the Division of Equal Opportunity became responsible for UCI P&Ps, taking over from the former Administrative & Business Services division. Then, less than two years ago, the Director of Compliance took over the role of overseeing APO, which

was previously held by the Director of Equal Opportunity/Affirmative Action. Most recently, the current and third APO manager in the past five years started her position less than a year ago, after a seven-month vacancy. Furthermore, this position is not solely dedicated to managing Campus P&Ps.

III. PURPOSE, SCOPE, AND OBJECTIVES

The purpose of this audit was to perform a review of current practices and processes as well as assess the internal controls in the administration, monitoring and tracking of Campus P&Ps. The scope included the review and sample testing of current and archived superseded policies and procedures.

For testing purposes, IAS included the following objectives:

1. Ascertain if Campus policies and procedures were reviewed and revised in a timely manner as required by policy;
2. Determine if superseded policies and procedures were properly and securely archived and available for review;
3. Verify if the most recent revision or review date is documented on each section; and
4. When sections are reviewed and there are no revisions, verify if an email was sent to the Manager of Administrative Policies confirming that the information is still current.

IV. CONCLUSION

The current manual procedures and processes for monitoring and tracking reviews of Campus policies and procedures should be replaced with policy management software that will efficiently and effectively manage, monitor, and track policies and other important documentation by ensuring timely collaboration and documented workflows that would make drafting, editing, reviewing, and approving policy documents seamless.

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

V. OBSERVATIONS AND MANAGEMENT ACTION PLANS

1. Policies and Procedures

Background

Policies and procedures exist to provide structure and standardization to processes carried out across an organization. At UC, university activities are primarily governed by systemwide policies. Campus policies and procedures are developed to address a specific Campus need to communicate what will or will not be done under certain circumstances.¹

UC Irvine Administrative Policies and Procedures (P&Ps) *Section 103-11: Guidelines for Writing and Publishing Administrative Policies and Procedures* states, "Responsible offices and administrators should revise their sections whenever their business processes or guidelines change, or whenever a change in system-wide policy affects stated Campus practices. In general, sections should be reviewed no less than every three years. The most recent revision or review date is indicated at the top of each section."²

Observation

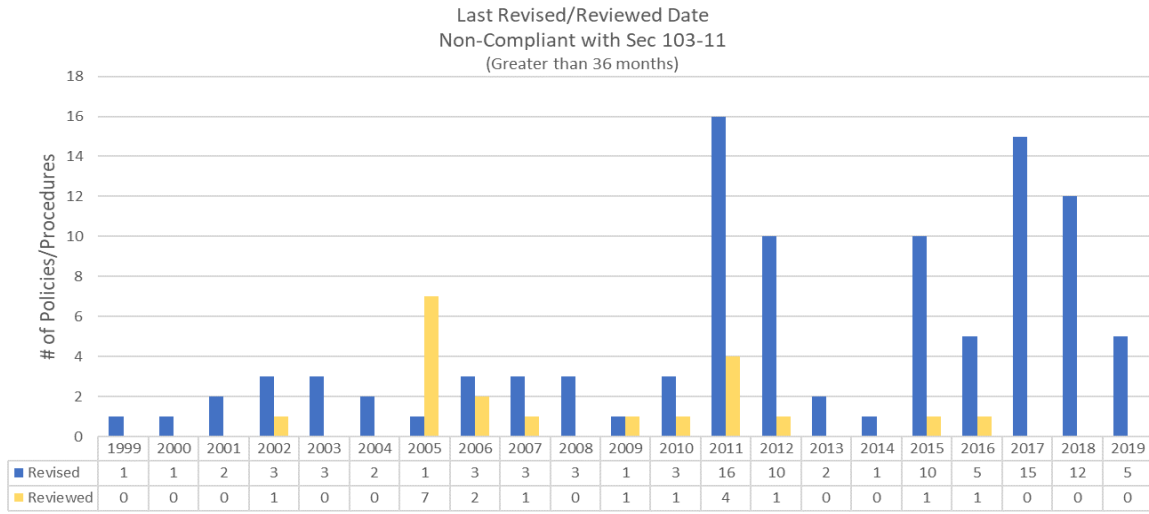
IAS reviewed all P&Ps hosted on the UCI Official University Policies & Procedures (UCI P&P) website (161 administrative and 36 personnel) as well as 109 other Campus P&Ps that are not hosted on the UCI P&P website as of January 1, 2023 to determine if proper procedures and processes were established and implemented to ensure timely policy reviews and/or revisions as required. IAS notes that other departmental P&Ps that may apply to faculty, staff, or the public, were not reviewed. The following is a summary of the observations.

As of January 1, 2023 and according to the published revision and/or reviewed date, 134 P&Ps, or 83% of the total administrative policies, have not been reviewed and/or revised within the last three years as per *Policy Section 103-11*.

- 102 P&Ps were last revised from May 1999 through December 2019. The oldest policy revision date is 284 months.
- 20 P&Ps were last reviewed from February 2002 through January 2016. The oldest policy review date is 251 months.

¹ "About UC Policy." *UCI Official University Policies & Procedures*, n.d., www.policies.uci.edu/about/index.php

² "Section 103-11: Guidelines for Writing and Publishing Administrative Policies and Procedures." *UCI Official University Policies & Procedures*, revised October 2017, www.policies.uci.edu/policies/procs/103-11.php



- 11 P&Ps have not been reviewed or revised since their issuance between May 2009 and January 2020.
- Only one P&P had technical edits completed in November 2010, 146 months ago.

For the 36 Personnel Procedures for UCI Staff Members that are hosted on the UCI P&P website, IAS noted:

- 20 P&Ps were last revised between November 2004 and September 2022, so the oldest policy was last revised 218 months ago.
- 16 P&Ps were issued between November 2002 and March 2016.

For the 109 other Campus-related policies and procedures IAS reviewed:

- Two Student Affairs P&Ps were last revised from December 1996 through August 2004; the oldest policy was last revised 311 months ago, and eight others were not dated.
- 26 Office of Research P&Ps were last revised from June 2002 through April 2022; the oldest policy was last revised 245 months ago, and three others were not dated.
- 13 Human Resource P&Ps (apart from the Personnel Policies for Staff Members) were revised from November 2002 through June 2021; the oldest policy was last revised 241 months ago.
- Four Academic Senate P&Ps were revised from May 2009 through September 2014; the oldest policy was last revised 162 months ago, and one P&P was not dated.
- Two Campus Recreation P&Ps were revised in June 2013 and October 2016; the oldest policy was last revised 73 months ago, and three others were not dated.

- 15 Library P&Ps were revised from September 2014 through June 2022; the oldest policy was last revised 98 months ago, and five other P&Ps were not dated.
- Four Student Housing P&Ps were revised from October 2014 through August 2022; the oldest policy was last revised 97 months ago, and one P&P was not dated.
- Two Academic Integrity & Student Conduct P&Ps were revised in April 2015 and June 2016; the oldest policy was last revised 91 months ago, and three other P&Ps were not dated.
- Ten Police Department P&Ps were revised or reviewed from December 2021 through March 2022; the oldest policy was last revised 11 months ago, and one P&P was not dated.
- One Graduate Division P&P was revised in September 2022; two other P&Ps were not dated.
- Four P&Ps were referenced but not available for review because they were under revision or the link to the policy was invalid.

Implementation of appropriate internal controls ensure timely, effective, and efficient policy reviews and/or revisions when required. Policies should include implementation dates to monitor for revision purposes.

IAS recommends that the UCI APO consult with each policy holder to determine whether their Campus policy should be rescinded or retired if UCOP does not require it in order to implement systemwide guidelines or it is not more restrictive than the applicable UCOP policy. Recission or retirement of their policy is also an alternative if the policy holder has developed online resources that summarizes UCOP requirements and guidelines to address a specific Campus need and communicates how to implement the procedures of that University business activity.

Management Action Plan

The Office of Administrative Policies and Procedures will procure policy management software to address implementation of appropriate internal controls for policies hosted on the Office of Administrative Policies and Procedures website. Additional consideration for policies not hosted on The Office of Administrative Policies and Procedures website can be addressed after initial controls have been established.

Due date: September 30, 2023

The Office of Administrative Policies and Procedures will update *Section 103-11: Guidelines for Writing and Publishing Administrative Policies and Procedures* once policy management software has been implemented to reflect new policy management procedures.

Due date: October 31, 2023

2. Archived Policies

Background

UC Policy on Policies, Section III. Policy Text states, “. . . consistent with the principles outlined in this Policy, the Executive Officer, or their designee, at each University location, must establish a local policy or procedure to implement a standardized policy management process. Campus policies must be compliant with any related Presidential Policy. This ensures compliance with applicable federal, state, and local laws and regulations.”³

Furthermore, Section III. G. states, “Rescinded or superseded policies must be included on the Presidential Policy website with a brief explanation or justification provided by the PO. Archived rescinded or superseded policies are available by request.”

Observation

UCI P&P, *Section 103-11: Guidelines for Writing and Publishing Administrative Policies and Procedures* did not establish a local policy or procedure to implement a standardized policy management process for rescinded or superseded policies.

For two of the four P&Ps reviewed, all superseded policies were not archived and available upon request.

In addition, IAS noted that for a third P&P, the policyholder did not revise their sections whenever there was a significant change in the system-wide policy referenced by the Campus policy as required.

Implementation of internal controls, such as a proper documentation and timely reviews, minimizes the risks of potential errors or inaccuracies in archiving policies.

Management Action Plan

The Office of Administrative Policies and Procedures will procure policy management software to address implementation of appropriate internal controls related to the policy archive.

Due date: September 30, 2023

³ “Establishing and Maintaining Presidential Policies.” *University of California – Policy on Policies*, 8 Aug 2021, www.policy.ucop.edu/doc/1100677/PolicyonPolicies.

3. Policy Holder Review

Background

UCI P&P, *Section 103-11: Guidelines for Writing and Publishing Administrative Policies and Procedures* states, "When sections are reviewed and there are no revisions, an email should be sent to the Manager of Administrative Policies confirming that the information is still current."

Observation

For 21 P&Ps that were last reviewed from June 2005 through September 2021, emails from policyholders confirming that their policy was reviewed and that no revisions were necessary because the information was current, were not documented, and on file. IAS also notes that there is a possibility that the policyholder may not have reviewed the policy and the lack of response from the policyholder was not documented.

Implementation of internal controls, such as a proper documentation and timely reviews, minimizes the risks of inconsistently enforced, outdated policies and potential compliance exposures.

Management Action Plan

The Office of Administrative Policies and Procedures will procure policy management software to address implementation of appropriate internal controls related to policy review.

Due date: September 30, 2023