

Youth Protection Program

*Division of Diversity and Community
Engagement*



August 2016

**The University of Texas at Austin
Office of Internal Audits
UTA 2.302
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This report has been distributed to Internal Audit Committee members, the Legislative Budget Board, the State Auditor's Office, the Sunset Advisory Commission, the Governor's Office of Budget and Planning, and The University of Texas System Audit Office for distribution to the Audit, Compliance, and Management Review Committee of the Board of Regents.

**Youth Protection Program
Project Number: 16.009**



OFFICE OF INTERNAL AUDITS
THE UNIVERSITY OF TEXAS AT AUSTIN

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August 29, 2016

President Gregory L. Fenves
The University of Texas at Austin
Office of the President
P.O. Box T
Austin, Texas 78713

Dear President Fenves,

We have completed our audit of the Youth Protection Program. Our scope included reviewing camps conducted during summer 2015 and 2016.

Based on the audit procedures performed, we conclude that the Youth Protection Program is generally in compliance with UT Austin policies and state and federal guidelines. One priority finding was noted regarding the release of campers. Four additional opportunities for improvement were noted in the areas of Communication Plan, Transportation Plan, Medical Emergency Plan and camp registration forms. Our audit report provides detailed observations for each area under review. Suggestions are offered throughout the report for improvement in the existing control structure.

We appreciate the cooperation and assistance of the Youth Protection Program manager throughout the audit and hope that the information presented herein is beneficial.

Sincerely,

A handwritten signature in purple ink, appearing to read "Michael W. Vandervort".

Michael W. Vandervort, CPA
Chief Audit Executive

cc: Institutional Audit Committee Members
Ms. Nancy Brazzil, Deputy to the President
Dr. Gregory Vincent, Vice President, Division of Diversity and Community Engagement
Dr. Jennifer Maedgen, Sr. Associate Vice President, Division of Diversity and Community Engagement
Ms. Patricia Ohlendorf, Vice President for Legal Affairs
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EXECUTIVE SUMMARY

Conclusion

Based on procedures performed, it appears that the Youth Protection Program (YPP) is generally in compliance with The University of Texas at Austin (UT Austin) policies and state and federal guidelines. Strengths identified during this audit include compliance with required training and background checks, as well as a comprehensive start to a new UT Austin program for identifying all camps, communicating expectations, and enforcing a new policy for keeping minors safe on campus. One priority finding was noted regarding the release of campers. Four additional opportunities for improvement were noted in the areas of Communication Plan, Transportation Plan, Medical Emergency Plan and camp registration forms. Five recommendations were made to improve compliance with UT Austin policies and procedures.

Summary of Recommendations

Each issue has been ranked according to The University of Texas System Administration (UT System) Audit Issue Ranking guidelines. Please see the Appendix for ranking definitions. The Office of Internal Audits (Internal Audits) identified one priority issue and one high level issue, which led to the following recommendations:

- Transportation Plan – Release of Campers (*Audit Issue Ranking: Priority*)
- Medical Emergency Plan – Transport of Campers (*Audit Issue Ranking: High*)

Three Medium ranked recommendations were also made, but are considered minor in significance.

Management agrees with our observations and has provided corrective action plans which are expected to be implemented by summer 2017.

Audit Scope and Objective

The scope of this audit included reviewing camp eligibility and registration, as well as required plans for Communication, Supervision, Medical Emergency, and Transportation. Internal Audits reviewed background checks and awareness training for Designated Individuals (camp personnel) from four sampled camps during the period summer 2015 – summer 2016. The audit objective was to determine whether camps or programs for minors on campus operating under the Youth Protection Program were in compliance with UT Austin policies and state and federal rules.

Background Summary

The Youth Protection Program was established in 2015 to create a safe environment for minors participating in sponsored camps and programs on The University of Texas at Austin (UT Austin) campus. The program has one employee and is located within the Division of Diversity and Community Engagement.



BACKGROUND

The Youth Protection Program (YPP) was established in 2015 to create a safe environment for minors participating in sponsored camps and programs on The University of Texas at Austin (UT Austin) campus. The program is managed by one employee and is located within the Division of Diversity and Community Engagement.

The YPP policy applies to all campus programs for minors held on UT Austin property, as well as programs sponsored by UT Austin, those that are held off campus, and those conducted out of state. “The university recognizes both its institutional and legal obligations to ensure the safety and wellbeing of minors while they are participating in sponsored university camps and programs. To provide a safe environment and life-changing experience, The University of Texas at Austin has created requirements that not only meet the legal expectations but also reflect the institution’s core value of Learning, Discovery, Freedom, Leadership, Individual Opportunity, and Responsibility.”¹

SCOPE, OBJECTIVES, AND PROCEDURES

The scope of this audit included reviewing the Communication, Supervision, Medical Emergency, and Transportation plans of four sampled camps. In addition, Internal Audits reviewed camp eligibility, background checks, and awareness training for Designated Individuals (camp personnel) working the four camps from summer 2015 – summer 2016. The audit objective was to determine whether camps or programs for minors on campus operating under the Youth Protection Program were in compliance with UT Austin policies and state and federal rules.

To achieve these objectives, Internal Audits:

- Reviewed applicable policies and procedures;
- Corresponded with relevant staff;
- Observed one camp in progress;
- Reviewed training records and background checks for Designated Individuals (DI)²; and
- Reviewed camp or program procedures.

This audit was conducted in accordance with the *International Standards for the Professional Practice of Internal Auditing* and with *Government Auditing Standards*.

¹ Youth Protection Program website: <https://youthprotectionprogram.utexas.edu/>

² “Any person involved in a campus program for minors, who has contact with a minor.” – [YPP Designated Individual Guidebook](#)



AUDIT RESULTS

Internal Audits found reasonable to strong controls regarding background checks and Sexual Abuse and Child Molestation Awareness training for DIs. However, Internal Audits has recommended increased controls over the release of campers, emergency transport, parental emergency notification, transport of campers by DIs, and program registration.

The following five recommendations were made to improve compliance with UT Austin policies. Each issue has been ranked according to The University of Texas System Administration (UT System) Audit Issue Ranking guidelines. Please see the Appendix for ranking definitions.

Transportation Plan – Release of Campers **Audit Issue Ranking: Priority**

The camp/programs reviewed by our office do not have sufficient documented procedures in place to ensure campers are not released to anyone other than a parent or legal guardian without written authorization. Rather than having a standard procedure for all camps, YPP policy tasks each camp/program to develop its own procedure to meet the requirements for the pick-up and drop-off of campers. The documented procedures do not adhere to the stated criteria, and thus do not provide assurance regarding safe release of campers.

An additional concern, not included in the original scope, arose during the course of the audit. Based on conversations with staff, IA learned that some campers are arriving and departing from campus unaccompanied by a parent or guardian. When camp directors do not ensure the safe release of campers by obtaining written authorization and requiring photo ID, then campers are at increased risk of harm and UT Austin is at risk of reputational damage.

Section VII.C.6 of the UT Austin's *Handbook of Operating Procedures* 3-1710 states, "Each program must establish a procedure for the pick-up and drop-off of campers, specifying times and locations, and assure that no camper will be released to any person other than his or her parent/legal guardian without specific written authorization."

Recommendation 1: The YPP manager should create a mandatory camper release form. The form should include a) how the camper will arrive and depart (accompanied or unaccompanied via airplane, bus, etc.), b) who will pick up the camper (if accompanied, by providing photo identification) and a release of liability section (if unaccompanied), and c) a section for parent/guardian to sign and date.

Management's Response and Corrective Action Plan:



This form has been created and sent to Legal Affairs for review. The draft is attached to this email.

Responsible Person: Youth Protection Program Manager

Planned Implementation Date: Once Legal Affairs approves the form it will be made available in DocuSign and on the YPP website for use.

Post Audit Review: Internal Audits will follow-up in the fourth quarter of FY17.

Medical Emergency Plan – Authorization to Transport **Audit Issue Ranking: High**

The YPP Consent for Medical Treatment Form requires parents to consent to medical treatment of their child, but does not authorize transport in an emergency situation. Staff believed that the Consent for Medical Treatment Form implied consent to transport. If authorization to transport a camper to a hospital in the event of an emergency is not obtained, there is risk of liability and reputational damage to the University.

Section VII.C.4 of the UT Austin's *Handbook of Operating Procedures* 3-1710 states, "The camp director of each program must obtain from each camper's parent/legal guardian the following...authorization to permit transportation of the camper to University Health Services or a local hospital as deemed necessary in an emergency."

Recommendation 2: In consultation with Legal Affairs, the YPP manager should ensure that camp directors are provided a form which includes authorization for emergency transport of campers.

Management's Response and Corrective Action Plan:

The YPP Medical Treatment Authorization form has been updated and sent to Legal Affairs for review. The draft is attached to this email.

Responsible Person: Youth Protection Program Manager

Planned Implementation Date: Once Legal Affairs approves the form it will be made available in DocuSign and on the YPP website for use.

Post Audit Review: Internal Audits will follow-up in the fourth quarter of FY17.

Communication Plan – Notification Procedure **Audit Issue Ranking: Medium**



YPP policy states that each camp or program is required to establish its own procedure for notifying parents/guardians in the event of an emergency. However, the YPP manager has since established guidelines in the Designated Individuals Guidebook that camp directors follow in the event of an emergency. The policy was created prior to the Designated Individuals Guidebook, so initially there were no universal procedures for camps or programs to follow. If camp directors establish their own camp procedures, then there is risk of harm or loss due to inconsistencies in notification procedures.

Section VII.C.3 of the UT Austin's *Handbook of Operating Procedures* 3-1710 states, "Each program will establish a procedure for notification of all campers' parents/legal guardians in the event of an emergency and obtain and keep accessible contact information for campers' parents/legal guardians available for designated individuals."

Recommendation 3: The YPP manager should amend the YPP Policy to read "Each program will **follow the guidelines** for notification of all campers' parents..."

Management's Response and Corrective Action Plan:

The YPP manager will amend the policy and create a communication plan template.

Responsible Person: Youth Protection Program Manager

Planned Implementation Date: The YPP manager will work with the policy program manager to amend the policy. The communication plan template will be available by October 2016.

Post Audit Review: Internal Audits will follow-up in the fourth quarter of FY17.

Transportation Plan – Transport of Campers by DIs

Audit Issue Ranking: Medium

According to the YPP manager, camps/programs reviewed were given prior approval to provide transport of campers by DIs, but the approvals were not documented. The YPP manager was not aware this approval should be documented. Without documenting approval for DIs to transport campers, there is risk of liability or reputational damage to UT Austin should a camper become injured during an unauthorized transport.

Section VII.C.6 of the UT Austin's *Handbook of Operating Procedures* 3-1710 states, "The youth protection program manager must review and approve in advance any program which provides for transportation of campers by Designated Individuals after drop-off by parent/legal guardian to the campus or other site."



Recommendation 4: The YPP manager should ensure that prior approvals granted for DIs to transport campers are documented or suspend the requirement for prior approvals by amending the policy and accepting the risk.

Management’s Response and Corrective Action Plan:

The youth protection program is in the process of purchasing an online registration system. That system will allow camp directors to answer a series of questions regarding their transportation plan. The system will approve or deny the transportation plan based on the answers to the questions.

If the online registration system is not fully implemented by the planned implementation date below, The YPP manager will send an email to each camp director at the start of camp season to approve or deny their transportation plans.

Responsible Person: Youth Protection Program Manager

Planned Implementation Date: Camp/Program Season 2017

Post Audit Review: Internal Audits will follow-up in the fourth quarter of FY17.

Camp/Program Registration Forms
Audit Issue Ranking: Medium

Two camps/programs reviewed during the audit had submitted their Camp/Program Registration Form fewer than 30 days before the commencement date of the program. The camp directors had not submitted the Camp/Program Registration Form because they had not hired all DIs by the deadline. When directors do not register their camp/program at least 30 days prior to commencement of the camp or program, then there is risk of the YPP manager and UT Austin not being informed and prepared for camps taking place on campus.

Section VII.C.2 of the UT Austin’s *Handbook of Operating Procedures* 3-1710 states, “Each University academic and administrative unit sponsoring a program in which minors participate, whether located on or off campus, is required to register such program with the youth protection program manager or designee not later than thirty (30) days prior to the commencement date of the program.”

Recommendation 5: The YPP manager should ensure that camp directors submit the Camp/Program Registration Forms no later than 30 days prior to the commencement date of the program. If the Camp/Registration Form is not submitted no later than 30 days prior to the commencement of the program, then an exception should be documented.

Management’s Response and Corrective Action Plan:



The YPP manager works with each camp director to ensure that the Camp/Program Registration Forms are submitted no later than 30 days before the start of the program. The YPP manager will continue to maintain documentation of exceptions (generally an email justification from the camp director) when there is a business reason for such forms to be turned in late.

Responsible Person: Youth Protection Program Manager

Planned Implementation Date: This is an ongoing process within the program

Post Audit Review: Internal Audits will follow-up in the fourth quarter of FY17.



CONCLUSION

Based on procedures performed, it appears that YPP is in general compliance with UT Austin policies and state and federal guidelines. Strengths identified during the audit include compliance with required training and background checks, as well as a comprehensive start to a new UT Austin program for identifying all camps, communicating expectations, and enforcing new policy for keeping minors safe on campus. A priority finding was noted regarding the release of campers. Opportunities for improvement were also noted in the areas of Communication Plan, Transportation Plan, Medical Emergency Plan and camp registration forms. Five recommendations were made to improve compliance with UT Austin policies and procedures.

In accordance with directives from The University of Texas System Board of Regents, the Office of Internal Audits will perform follow-up procedures to confirm that audit recommendations have been implemented.



APPENDIX

Audit Issue Ranking

Audit issues are ranked according to the following definitions, consistent with UT System Audit Office guidance. These determinations are based on overall risk to UT System, UT Austin, and/or the individual college/school/unit if the issues are left uncorrected. These audit issues and rankings are reported to UT System directly.

- **Priority** – A Priority Issue is an issue that, if not addressed immediately, has a high probability to directly impact achievement of a strategic or important operational objective of UT Austin or the UT System as a whole.
- **High** – An issue that is considered to have a medium to high probability of adverse effects to UT Austin either as a whole or to a significant college/school/unit level.
- **Medium** – An issue that is considered to have a low to medium probability of adverse effects to UT Austin either as a whole or to a college/school/unit level.
- **Low** – An issue that is considered to have minimal probability of adverse effects to UT Austin either as a whole or to a college/school/unit level. Issues with a ranking of “Low” are reported verbally to the unit and are not included in the final report.