

1/15/2021

BOARD OF REGENTS OF THE UNIVERSITY OF WISCONSIN SYSTEM

Audit Committee

Via WebEx Videoconference

Thursday, February 4, 2021

8:45 a.m. – 10:00 a.m.

- A. Calling of the Roll
- B. Declaration of Conflicts
- C. Approval of the Minutes of the December 10, 2020 Meeting of the Audit Committee
- D. Internal Audit
 - 1. Fiscal Year 2021 Audit Plan Progress Report
 - 2. Summarized Results of Audits Recently Issued
- E. Compliance
 - 1. Title IX Update
 - 2. Youth Protection and Compliance Update

FISCAL YEAR 2021 AUDIT PLAN PROGRESS

REQUESTED ACTION

For information and discussion only.

SUMMARY

One of the responsibilities of the Audit Committee, as outlined in the committee charter, is to review and approve the annual internal audit plan and receive interim progress reports at least quarterly.

The attached chart provides a summary of audit progress for the Fiscal Year 2021 Audit Plan.

Presenter(s)

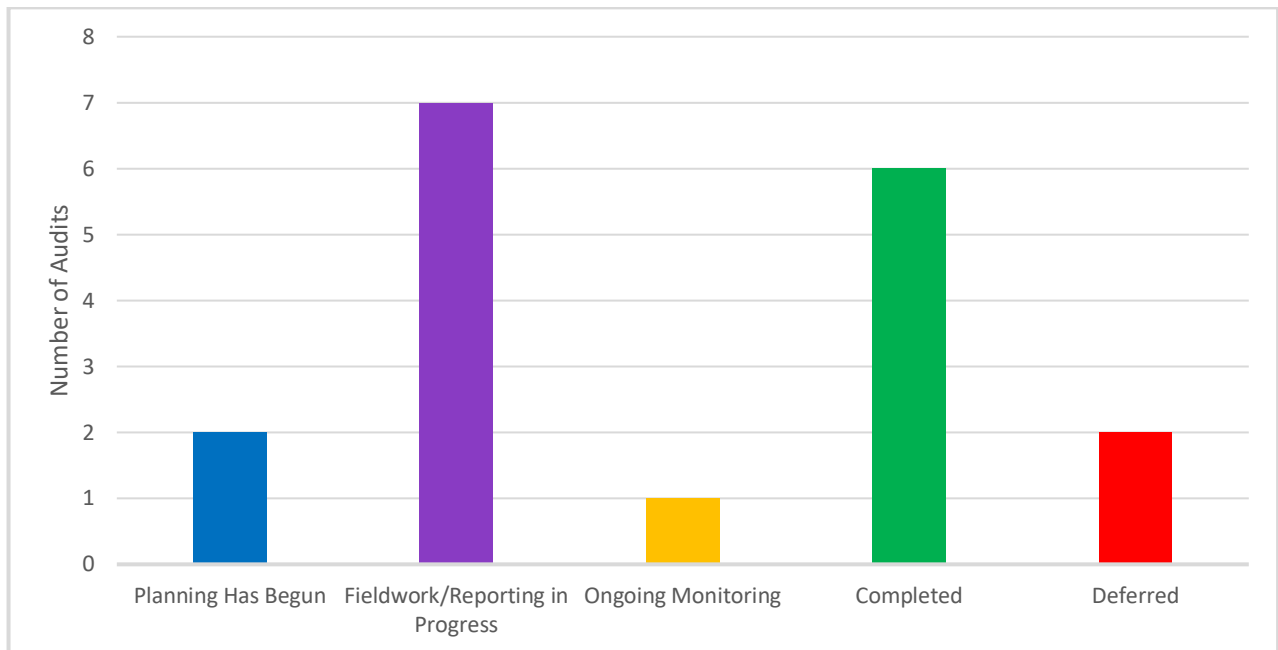
- Lori Stortz, Chief Audit Executive

ATTACHMENTS

- A) UW System Administration Office of Internal Audit Fiscal Year 2021 Audit Plan Progress Chart.

**UW SYSTEM ADMINISTRATION
OFFICE OF INTERNAL AUDIT
FISCAL YEAR 2021
AUDIT PLAN PROGRESS**

	Title	Risks
1	Payroll (Continuous Monitoring)	Fraud
2	Purchasing Cards (Continuous Monitoring)	Fraud, Embezzlement
3	Post-Tenure Review	Compliance with Board Policy
4	Oversight of Programs with Minors	Physical Safety and Security
5	Other Affiliated Organizations	Fraud, Embezzlement, Reputation
6	Laboratory Safety	Physical Security and Safety, Legal Compliance
7	Emergency Grant Aid Payments to Students Under the CARES Act	Regulatory Compliance, Reputation
8	Information Technology Disaster Recovery	Continuity of Operations, Data Protection
9	Incident Response	Data Availability, Breach of Information, Reputation
10	Security Awareness	Data Security, Reputation
11	Foreign Influence	Regulatory Compliance, Reputation
12	Contracts with Private Entities	Conflict of Interest, Reputation
13	NCAA Division III Athletics Financial Transactions	Fraud, Conflicts of Interest, Reputation
14	Independent Contractors	Fraud, Regulatory Compliance, Conflict of Interest
15	Change Requests of Bank and Contact Information	Fraud
16	Non-Competitive Bids	Fraud, Regulatory Compliance, Conflicts of Interest
17	NCAA Athletics Division I Consulting Engagements	Data Accuracy
18	Internal Assessment	Conformance with Standards, Code of Ethics



SUMMARIZED RESULTS OF AUDITS RECENTLY ISSUED

REQUESTED ACTION

For information and discussion only.

SUMMARY

Since the December 10, 2020 meeting of the Audit Committee, the Office of Internal Audit has issued the following reports:

- NCAA Agreed-Upon Procedures – Executive Summary
- NCAA Agreed-Upon Procedures – UW-Green Bay
- NCAA Agreed-Upon Procedures – UW-Milwaukee

Presenter(s)

- Lori Stortz, Chief Audit Executive

BACKGROUND

One of the responsibilities of the Audit Committee, as outlined in the committee charter, is to summarize results of audits recently issued.

TITLE IX UPDATE

REQUESTED ACTION

Item for information and discussion only.

SUMMARY

A brief status update on the Title IX regulation permanent rule-making process will be provided, as well as a review of next steps related to RPD 14-2 and Title IX related resource development.

Presenter(s)

- Sarah E. Harebo, UW System Title IX and Clery Administrator

BACKGROUND

Title IX of the Education Amendments of 1972 requires all educational institutions that receive federal funds eliminate sex discrimination in their education programs and activities (34 C.F.R. Part 106). The U.S. Department of Education (ED) released final regulations effective August 14, 2020, establishing educational institutions' responsibilities in responding to reports of sexual harassment, sexual assault, dating violence, domestic violence, and stalking involving faculty, staff, and students. In August 2020, the University of Wisconsin System (UW System) implemented emergency rules to modify Chapters UWS 4, 7, 11, and 17 of the Wisconsin Administrative Code to comply with the new federal regulations. On December 10, 2020, the Board approved the permanent rules for submission to the Governor's office.

Previous Action or Discussion

UWS 4, 7, 11, and 17

The Board last discussed this topic at its December 10, 2020 meeting, when the Board approved the permanent rules for submission to the Governor's office. On November 5, 2020, the Board approved draft permanent rules for submission to Legislative Council for

review, a Notice of Public Hearing on the draft permanent rules, and a Notice of Submittal to Legislative Council. Previously, at its August 5, 2020, meeting, the Board approved emergency rules for Chapters 4, 7, 11, and 17 of the Wisconsin Administrative Code to bring those rules into compliance with Title IX prior to the August 14, 2020, effective date of the new federal regulations. This approval occurred after the preliminary hearing and public comment period regarding the rule scope statements, which the Board approved at its July 9, 2020 meeting.

Regent Policy Document 14-2, "Sexual Violence and Sexual Harassment"

The Board of Regents amended RPD 14-2 through the adoption of Resolution 11475 in August 2020 to create an interim Title IX policy that incorporated changes related to Title IX sexual misconduct required by the new federal regulations and extended those changes to other University employees besides faculty and academic staff. Faculty and academic staff sexual misconduct is addressed in UWS 4 and 7 and UWS 11 respectively.

Related Policies

- [Regent Policy Document 14-2, "Sexual Violence and Sexual Harassment"](#)
- [Chapter UWS 4](#), Wis. Admin. Code: "Procedures for Dismissal"
- [Chapter UWS 7](#), Wis. Admin. Code: "Dismissal of Faculty in Special Cases"
- [Chapter UWS 11](#), Wis. Admin. Code: "Dismissal of Academic Staff for Cause"
- [Chapter UWS 17](#), Wis. Admin. Code: "Student Nonacademic Disciplinary Procedures"
- Other relevant guidelines

YOUTH PROTECTION AND COMPLIANCE UPDATE

REQUESTED ACTION

Item for information and discussion only.

SUMMARY

“Returning Minors to Campus Post Covid-19 Closures” Conference on January 19, 2021.

On January 19, 2021, the Office of Compliance held its first professional development [webinar](#) series around youth protection. The intent of the webinar was to provide information to campuses on how to strategically bring minors back to campus and provide resources for creating plans which outline the steps necessary to accomplish this. Participants received field guides and checklists from the CDC and the American Camp Association. These and other resources along with recordings of the sessions are available on the Compliance and Integrity website for anyone unable to attend. A follow-up webinar is planned for late February to answer questions from campuses as they begin to develop their plans.

Update: Development of Youth Protection Policy and Database

In order for all campuses to have an opportunity to have input on the policy, a draft has been populated to each campus for input. Campus recommendations are being compiled in a spreadsheet and compared to make policy modifications when possible. The draft policy will be submitted to System leadership for additional input this summer.

The database is on schedule and a number of institutions have inquired about being leaders in this work by serving as a pilot institution. The initial pilot of the data base will begin in early March.

Presenter(s)

- Prenicia Clifton, UW System Director of Youth Protection and Compliance

BACKGROUND

As the Director of Youth Protection and Compliance, Prenicia Clifton is charged with working with UW System Precollege Liaisons, program directors, and youth program coordinators to support the implementation of training, safe oversight of minors, policies, and standards for youth protection and compliance.

Previous Action or Discussion

Prenicia Clifton was introduced at the October 5, 2020 meeting of the Audit Committee at which time she provided a high-level overview of the work she would be collaborating on with UW System institutions to support the protection of minors on campus. This past December, Prenicia shared how the development of a systemwide “Framework of Compliance” that creates standard operating procedures for both tracking and training all persons serving minors under the auspice of UW-System will address gaps in the most recent audit of programs with minors.

Related Policies

- [UW System Administration Internal Policy HR-8](#), Policy for Children in the Workplace
- [UW System Administration Internal Policy HR-7](#), Mandatory Reporting of Child Abuse and Neglect Policy (Executive Order 54)
- [Regent Policy Document 20-19 \(formerly 06-4\)](#), University of Wisconsin System Criminal Background Check Policy
- [Minor Protection and Adult Leadership Policy](#)