



Internal Audit Department

Minors on Campus Audit Report

**January 2017
Report Number FY 17-03**

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Northern Arizona University
Minors on Campus
Audit Report
January 12, 2017

Summary

Our audit of NAU Minors on Campus is in the Annual Audit Plan for FY 2017, as approved by the Audit Committee of the Arizona Board of Regents. This audit links to NAU's strategic goals of civic engagement and student success.

Background: The age of majority in Arizona is 18. NAU provides community outreach to individuals under 18 for a variety of reasons, including recruiting, providing a smooth transition to college, and fostering academic and athletic pursuits of interest to potential university-bound students. Some of the programs geared to minors include:

- America Reads
- Centennial Forest Environmental Education Programs
- Curry Summer Music Camp
- Youth Authors Camp
- Athletic Summer Camps and Clinics
- Forester Academies
- Mountain Jack Kids Camp
- NAU Community Music and Dance Academy
- NAU Explorer's Camp
- Nizhoni Academy
- Outdoor Leadership Academy
- Royal Academy of Dance
- Successful Transition and Academic Readiness
- Upward Bound

NAU also provides services to minors in the community through the Dental Hygiene Clinic, the Speech-Language-Hearing Clinic, and swimming lessons. Graduate assistants use NAU facilities to provide private music lessons and tutoring assistance. Minors may assist with research in a laboratory setting.

Hosting minors on NAU's campuses poses risks to NAU, resulting from issues such as allegations of sexual harassment, physical injury, psychological injury, bullying, and failure to disclose concerns to appropriate officials. NAU's Policy Committee has drafted a policy to address risks posed by hosting minors at its campuses.

Many departments have developed their own policies and procedures to address contact with minors.

Northern Arizona University
Minors on Campus
Audit Report

Audit Objectives: The primary objectives of this audit are to determine whether NAU has developed and implemented the necessary policies and procedures to help ensure the safety and well-being of minors on NAU's campuses; and to identify any deficiencies in the proposed draft policy.

Scope: The scope of our audit included a review of current policies and procedures related to minors on campus currently in effect; and to review the proposed policy drafted by the Policy Committee.

Methodology: The following procedures were performed to accomplish the audit objectives:

- identified and met with primary units and departments who have contact with minors;
- developed and distributed questionnaires to those primary units and departments to assess risks posed by minors on campus and identify potential solutions;
- gained an understanding of minors on campus policies and procedures at other campuses;
- obtained departmental policies and procedures currently in effect; and
- reviewed the policy drafted by NAU's Policy Committee to determine whether all risks have been satisfactorily addressed.

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

Conclusion: NAU has drafted a policy that is similar to the policy in effect at the University of Arizona. The policy addresses many of the concerns related to hosting minors on campus. In addition, to finalizing NAU's policy, NAU senior leadership should issue a memo to all NAU employees that reiterates NAU's commitment to safety and the well-being of all students and visitors on campus. The memo should highlight actions to take in the event any abuse is suspected on any of the University's campuses.

The draft policy incorporates two key controls: dual supervision of minors and parental/guardian approval of participation.

Northern Arizona University
Minors on Campus
Audit Report

Management is supportive of our recommendations and has actively begun working to implement their identified action items.

The control standards we considered during this audit and the status of the related control environment are provided in the following table.

General Control Standard (The bulleted items are internal control objectives that apply to the general control standards, and will differ for each audit.)	Control Environment	Recommendation No.	Page No.
Reliability and Integrity of Financial and Operational Information	Not Applicable		
Safeguarding of Assets	Not Applicable		
Authorization Procedures	Not Applicable		
Effectiveness and Efficiency of Operations			
<ul style="list-style-type: none"> NAU has a policy to adequately address risks posed by minors on campus. 	Opportunity for Improvement	1	5
<ul style="list-style-type: none"> The policy or policies have been effectively communicated to those who have contact with minors on campus. 	Opportunity for Improvement	1	5
<ul style="list-style-type: none"> NAU has a process to impartially investigate allegations of abuse of minors on campus. 	Reasonable to Strong Controls in Place		
Compliance with Laws and Regulations			
<ul style="list-style-type: none"> NAU's policies promote laws and regulations associated with minors on campus. 	Reasonable to Strong Controls in Place		

Northern Arizona University
Minors on Campus
Audit Report

We appreciate the assistance of representatives from Athletics; College of Arts and Letters; College of Education; College of Engineering, Forestry, and Natural Sciences; College of Health and Human Services; College of Social Behavioral Sciences; Contracting and Purchasing Services; Enrollment Management and Student Affairs; Environmental Health and Safety; Office of General Counsel; and the University Police.

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Northern Arizona University
Minors on Campus
Audit Report

Audit Results, Recommendations and Responses

1. The Minors on Campus draft policy should be modified and put into effect.

Condition: The contents of NAU's draft policy, Minors on Campus, was reviewed and compared to leading practices in effect at other universities. The review identified additional concerns that should be addressed by the policy prior to it being issued:

- Annual notification by senior administration to the NAU community of the requirement to comply with the Minors on Campus policy;
- Statement that some programs may require additional policy guidance for minors on campus due to the nature of their activities, i.e. Campus Health Services and the Speech-Language-Hearing Clinic;
- Explanation of when parents and guardians are required to sign NAU's Assumption of Risk form for certain programs;
- Where applicable, meals and housing should be part of the topics to be addressed by program administrators during program registration (the draft policy mentions housing, but not meals);
- The participation requirement forms, as developed by program administrators, should include an acknowledgment by the parent or guardian that the minor is able to participate; and
- Need to supplement policy for program-specific issues if warranted.

Criteria: NAU should have a policy that addresses minors on campus due to their vulnerability and the critical importance of protecting minors from harm.

Cause: NAU has not issued a policy addressing minors.

Effect: The safety and well-being of minors on NAU's campuses has not been adequately formally addressed by policy.

Recommendation: Finalize and distribute the Minors on Campus policy University-wide.

Response: The Policies Committee will finalize and distribute the Minors on Campus Policy by the end of the 2017 Spring Semester.

Northern Arizona University
Minors on Campus
Audit Report

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This report is intended for the information and use of the Arizona Board of Regents, NAU administration, the Arizona Office of the Auditor General, and federal awarding agencies and sub-recipients.

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