



## The Audit Perspective

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## Do you have any Programs involving Minors?

If so, Program Directors must be in compliance with the [Supervision of Minors Policy](#). The policy provides the minimum standard for appropriate supervision of Minors on campus and Minors who are involved in University-sponsored programs, programs held at the University, or programs housed in or through the University.

## Who is a **Minor**? What is a **Program**?

### Definitions

**Minor** – A person under the age of eighteen (18) who is not enrolled at the University. Students who are “dually enrolled” in University Programs while also enrolled in elementary, middle and/or high school are not included in this policy unless such enrollment is a Residential Program.

**Program** – Programs and/or group activities designed for, marketed for, and which include Minors as participants whether offered by various academic or other units of the University or by non-University groups using University facilities. Program(s) do not include:

- Private lessons or other instruction offered by individuals using University facilities;
- Activities that require a Guardian to be present at all times;
- On-campus events and activities sponsored by an accredited educational institution which has its own policies to supervise and protect Minors;
- Athletics competitions which involve no significant, substantive programming beyond the competition itself;
- Interaction with Minors in the context of curricular, practical training supervised by University faculty;
- Off-campus clinical or practicum experiences supervised by a third-party entity;
- Research involving Minors using research protocols approved by the University’s Institutional Review Board;

- Mass Transit provided by the University; and
- Attendance by Minors at events open to the general public and other similar ticketed events (though this exception does not include Minors' participation in preparation, rehearsals, and backstage work for plays, concerts, and other such events, which shall be considered Programs included within the protections of this policy).

**Authorized Adult** – Program Staff members who are eighteen (18) years or older who supervise, chaperone, or otherwise oversee Minors in Programs. This may include but is not limited to, faculty, staff, volunteers, graduate and undergraduate students, interns, employees of temporary employment agencies, independent contractors, or consultants.

**Program Staff** – All persons who participate in conducting a Program, whether they are Authorized Adults, employees providing temporary or clerical support, or healthcare professionals. Program Staff members may not supervise Minors, unless the Program Staff members are also Authorized Adults.

**Residential Program** – Any University offered or University sponsored Program that involves housing Minors overnight.

**One-on-One Contact** – Private, unsupervised, face-to-face interaction, either on University property or during a Program. This includes the transportation (in a personal or university vehicle) of a Minor by an agent or employee of the University in the course and scope of performing university duties or as a part of a Program.

### **Important Policy Requirements**

**Background Checks** – Required EVERY 3 YEARS for all Authorized Adults. Background checks may be performed more frequently (e.g.: bi-annually, annually, semi-annually, etc.) at the Program Director's request. These must be University-approved background checks. A background check from another employer will not satisfy this requirement.

The Department of Human Resources is solely authorized to conduct and oversee the background check process. Results of background checks must be reviewed and approved by the University's Title IX Coordinator or designee prior to being hired and/or interacting with Minors in a Program.

***Tip: Most Programs occur in the summer, so request background checks as early as possible to ensure they are completed timely!***

**Training** – Required ANNUALLY for all Authorized Adults. Training is encouraged for all Program Staff, but is not required. Supervision of Minors training can be taken online or conducted in-person by the Title IX Office upon request.

**Duty to Report** – If any person has reason to suspect that a Minor has been subject to neglect or abuse, he or she must report it to:

- MS Department of Human Services Abuse Hotline
- University Policy Department
- Program Director
- Title IX Coordinator

**“See Something, Say Something”** – If any person witnesses a violation of this policy, such as One-on-One Contact, or anything that gives rise to concern for the health or safety of a Minor, that person shall immediately notify the University’s Title IX Coordinator or designee (662-915-7045).

See the [Supervision of Minors Policy](#) for a complete list of requirements.

***Did you know?***

**Minors 4 and Under** – MUST be accompanied by the Minor’s guardian, unless the Program is a licensed day care facility

**Minors 8 and Under** – CANNOT participate in any Residential Programs

***Questions?***

Contact the University’s Title IX Coordinator, Honey Ussery, at [hbussery@olemiss.edu](mailto:hbussery@olemiss.edu) or extension 7045. See the [Supervision of Minors website](#).

***Need help organizing your Program?***

Pre-College Programs within the Division of Outreach is available to help! Contact the Director of Pre-College Programs, Dr. Ellen Shelton, at [eshelton@olemiss.edu](mailto:eshelton@olemiss.edu) or extension 7925.



THE UNIVERSITY OF  
**MISSISSIPPI**  
**MINORS POLICY**

To ensure appropriate supervision of minors who are on campus or involved in university-sponsored programs, follow these helpful tips:

- Do **NOT** have one-on-one contact with minors.
- If you suspect that a minor has been abused or neglected, state law requires that you call the Mississippi Department of Human Services and University Police Department immediately.
- **SEE SOMETHING, SAY SOMETHING**  
It is **YOUR DUTY** to report to the Title IX Coordinator anything that gives rise to concern for the health or safety of a minor.

**CALL**

Mississippi Department of Human Services Abuse Hotline  
**1-800-222-8000**

University Police Department  
**(662) 915-7234**

Title IX Coordinator  
**(662) 915-7045**

For more information, visit:  
[http://www.olemiss.edu/depts/affirmative\\_action](http://www.olemiss.edu/depts/affirmative_action)

**Training with Internal Audit**

***Lead Your Team:***

A section on the Code of Ethics and Conduct is presented by Internal Audit during the Lead Your Team training sessions. Lead Your Team is a three-day program designed to develop the skills necessary to supervise professionally and effectively. This is a core course highly recommended for employees with supervisory and people management responsibilities. The next Lead Your Team sessions are offered on June 6<sup>th</sup>, 13<sup>th</sup>, and 20<sup>th</sup>. Sign up on the [HR website!](#)

### ***Account Reconciliation:***

The Office of Internal Audit offers training on account reconciliation. A session is currently scheduled for April 12th, 2018 from 10:30am- 12:00pm at the Law School, Room 1115. In this class, employees will learn how to perform monthly account reconciliations for revenue and expenditures (including payroll) in order to be compliant with the [Responsibilities of Signatory Officers Policy](#). This class is designed for signatory officers as well as other employees who have been delegated the responsibility for reconciling departmental accounts. To register for upcoming sessions, go to our [website](#).

## **New and Updated Policies**

The University of Mississippi [Policy Directory](#) is a central location for accessing University policies. Since our last newsletter, the following policies have been implemented or updated:

### ***New Policies:***

HIPAA Policies – The following policies provide guidelines regarding the treatment of confidential health information.

- [Access Uses Disclosures of PHI](#)
- [Accounting of Disclosures of PHI](#)
- [Breach Notification](#)
- [Disclosure of De-identified PHI](#)
- [Disclosure of PHI Through Marketing Activities](#)
- [Disclosure of PHI To Be Housed in Health Oversight Activities](#)
- [Disclosure of PHI for Administrative and Judicial Purposes](#)
- [Disclosures of PHI to the FDA](#)
- [Minimum Necessary Uses Disclosures of PHI](#)
- [Policy on HIPAA Compliant Research HIPAA](#)
- [Requests by Individuals for Confidential Communications of PHI](#)
- [Patients Request to Amend their PHI](#)
- [Information Security Management Program](#)
- [Third Party Risk Management](#)
- [Business Continuity Management](#)
- [Physical and Environmental Security](#)
- [Security Awareness and Training](#)
- [Access Control](#)
- [Password Protection](#)
- [Clear Desk and Clear Screen](#)
- [Remote Working](#)
- [Information Exchange](#)
- [Data Classification and Handling](#)
- [Information Asset Management](#)
- [Configuration Management](#)
- [Network Protection](#)

- [Wireless Network Security](#)
- [Endpoint Protection](#)
- [Encryption](#)
- [Media Protection](#)
- [Mobile Computing Device Security](#)
- [Remote Access](#)
- [Vulnerability Management](#)
- [Audit Logging and Monitor Policy](#)
- [IT Sanction](#)
- [Information Technology Acceptable Use](#)
- [Incident Management](#)
- [Reporting Incidents to Law Enforcement Agencies](#)
- [Request for Restrictions on uses and Disclosures of PHI Policy](#)
- [Securing Work Areas to Prevent Unauthorized Use](#)
- [Risk Management](#)

**Updated Policies:**

- [Bid Requirements – Exceptions](#) – Commodities and equipment on negotiated state contracts should be ordered from contract vendors or you must obtain quotes or bids that do not exceed state contract pricing. “Sole source” purchases can only be ordered once the procuring department follows the sole source certification process consisting of: checking the “Sole Source” box on the requisition in SAP, submitting the online “IT Sole Source Form” or the “Non-IT Sole Source Form”, advertising for objections, and receiving approval granted by the state.
- [Cost of Attendance \(COA\) Professional Judgements](#) – The policies and procedures are now in the Federal Student Aid Handbook. The amount of COA increase is capped according to the results of a survey conducted by the Office of Financial Aid to identify the prevailing rate (per child) for dependent care in the local community (per federal regulation). If the student is married, or both parents of the dependent(s) are living together, it is typically assumed that child care costs must be divided equally between both parents. Since UM is a public state institution, the standard of “314 miles” is utilized because it is the distance to Biloxi, the furthest city from Oxford within Mississippi. Therefore, the regular travel allowance covers all state residents. For non-resident students outside the “314 miles,” it might not be realistic to assume that the student will be driving, so other reasonable methods will be utilized. If a COA is granted for Wintersession, it must be repaid if the course is dropped within the refund period.
- [Scientific Diving Safety Manual](#)

## **Self-Assessment**

Self-assessment is a valuable tool to help identify internal control deficiencies and assist in departmental management and audit preparation. The self-assessment consists of a series of “yes” or “no” questions. “Yes” indicates adequate controls in an area, while “no” indicates control deficiencies. Additional control related information is provided below each question to aid in resolving control deficiencies. Links to relevant policies are also included for each section. The self-assessment can be accessed [here](#). For questions not addressed in the self-assessment, please feel free to contact us at 662-915-7017 or [auditing@olemiss.edu](mailto:auditing@olemiss.edu).



We hope you find the information in our newsletters useful. If you have any suggestions, questions, or feedback, please contact us at 662-915-7017 or [auditing@olemiss.edu](mailto:auditing@olemiss.edu).