Report on International Observers/Visting Scientists #13-114

We have completed our audit of the Observers, Trainees, and Visiting Scientists Program. This audit was performed at the request of the UTHealth Audit Committee and was conducted in accordance with the International Standards for the Professional Practice of Internal Auditing.

BACKGROUND

The Observers, Trainees, and Visiting Scientists Programs are administered by the Office of Academic & Research Affairs and by the Office of Global Health Initiatives (OGHI). Participants in the program are generally referred to as visitors. A visitor is an individual who, though uncompensated by UTHealth, is given access to UTHealth property, facilities and/or information systems, at the discretion of UTHealth, for a specific period of time for collaborative or educational purposes. Visitors are not considered employees for any purpose, and are not entitled to wages or benefits.

There are six categories of Visitors to UTHealth: Guest, Observer, Pre-Baccalaureate Trainee, Professional Trainee, Visiting Student Trainee, and Visiting Scientist. Our audit did not include Guests, but focused on the other five categories. To apply for one of the other five Visitor categories, the Applicant must identify a Faculty Sponsor at UTHealth and they must complete an application and submit it to UTHealth administration for review and approval.

Employee Health Services reviews and clears the applicant's immunization forms and Human Resources orders the background checks and issues ID Badges. For foreign nationals, the visitor is screened by the Office of International Affairs (OIA) using Visual Compliance (a background check system that ensures compliance with federal export control regulations) and their application is reviewed for type of work performed and technology exposure, to determine if Export Controls are needed. The OIA also reviews and approves the foreign national's visa.

The domestic applications are reviewed and processed by an administrator (processor) in the Office of Academic and Research Affairs, and the applications of foreign nationals are reviewed and processed by an administrator (processor) in the OGHI.

All applications (foreign and domestic) must be approved by the Executive Vice President for Academic and Research Affairs and will not be considered for approval until they are completed.

For the foreign national's application, additional approval is needed by the Vice President of Research and Technology on behalf of the OGHI.
OBJECTIVES

The objective of this audit was to determine whether the controls over monitoring and supervising the international observers and visiting scientists are adequate and functioning as intended.

SCOPE AND METHODOLOGY

Audit and Advisory Services (A&AS) interviewed processors in the Office of Academic & Research Affairs (ARA), Office of Global Health Initiatives (OGHI), Office of International Affairs (OIA), and Human Resources (HR) to gain a better understanding of the application process.

We reviewed the X-Files document management system, which is used to house the visitor applications, and a list of approved visitors from FY2012 and FY2013 to determine completeness. We reviewed a sample of applications for signature approvals and clearances, to determine if they were properly approved. We also reviewed ID Badge cut-off and access reports to corroborate the visitor’s length of stay and building access.

We interviewed a sample of visitors to measure compliance with program parameters and institutional policies and procedures, and observed after-hour building access activity for evidence of visitors working after-hours.

AUDIT RESULTS

Number of Visitors
In FY2011, 365 Observer, Trainee, & Visiting Scientist applications were processed. In FY2012, 435 applications were processed, and in FY2013, as of March 14, 2013, 195 applications had been processed.

In January 2013, A&AS was provided a detailed listing of 117 foreign and domestic applicants from the FY2013 period. For the FY2012 period, a detailed listing of foreign visitors was also provided to A&AS. A detailed listing of domestic visitors was unavailable for the FY2012 period because the domestic applications are not input into File Maker Pro work group database.

With the foreign applications, the processor receives and reviews the applications, and manually types key data from the application into the File Maker Pro work group database. This database enables a user to run queries and produce reports as needed, based on any of the key data fields (i.e., name, country of citizenship, category, begin/end date, sponsor, sponsor department, school, etc.). The applications are then scanned into the secure X-Files document management system where an electronic copy of the application is housed for retention.

With the domestic applications, the processor receives and reviews the application. However, they do not input the key data from the application into the File Maker Pro work group database. The application is scanned into the secure X-Files document management system where they are also housed for retention. Both foreign and domestic applications are combined and housed together in the secure X-Files document management system.
Recommendation 1:
We recommend that the Office of Academic & Research Affairs and Office of Global Health Initiatives develop a process to electronically record their application’s data in the same way so that reports can be run which would include key data from both the foreign and domestic applications, allowing for data manipulation and trend analysis.

Management’s Response: The Office of Academic & Research Affairs and Office of Global Health Initiatives agrees with the recommendation and will develop a process to record future (Observers, Trainees, and Visiting Scientists Program) applicant’s information in an electronic database that has the capabilities of report writing, data manipulation, and trend analysis. Going forward, this process will be implemented and used by processors in both the Office of Academic & Research Affairs and in the Office of Global Health Initiatives.

Responsible Party: Dr. George Stancel, EVP, Academic and Research Affairs
Implementation Date: November 30, 2013

Application Approvals
We selected 25 visitor applications to review for proper clearance and approval. We reviewed Applications, Trainee Plans, Visas, OIA Clearance E-Mails, Immunization Forms, Employee Health Services Clearance E-Mails, Background Checks, Institutional Affiliation Agreements, and Statements of Financial Responsibility.

We verified that 23 of the 25 visitor applications had background checks performed, applications properly approved, Health Service clearance, and OIA clearance (for foreign applicants). One of the 25 applicants was re-routed to a (Post Doc) program which was more suitable to their circumstances. We also found that 1 of the 25 did not obtain their Health Service clearance and was therefore not cleared to receive an ID Badge. They have since obtained their Health Service clearance and ID Badge. We found that a fix to the application approval process had previously been made to alleviate this issue.

We found that 19 of the 24 visitor’s stay were within the original term limits for their program’s category and the other five were granted extensions for stays beyond the normal length for their particular category. Our review also found that the applicants tested had the correct visas for their particular program as determined by the OIA.

Identification Badges
For ID Badge testing, we selected 33 visitors. Our test-work determined that two of the visitors had ID Badges that were not cut-off at the end of their program’s term, and one visitor could not be found in the ID Badging System, even though he was listed as “Approved” for the program. Further investigation determined that the visitor not listed in the ID Badging System was the same visitor who had not obtained their Health Service clearance and therefore not issued an ID Badge. The two visitors whose ID Badges were not cut-off at the end of their program were due to an error when initially setting them up.

Visitor Interviews
The Office of Academic & Research Affairs and OGHI developed an application and procedure overview guide for potential visitors. It states that the purpose of collecting applicant information is to allow UTHealth to evaluate an applicant’s suitability for the program and
compliance with applicable regulations. It also clarifies each party’s rights and responsibilities in regards to the program. The institution also has an operating policy and procedure that defines "Observers" and further spells out the rules and regulations surrounding the association. We interviewed seven visitors [two domestic and five foreign nationals] to determine compliance with program instructions and institutional guidelines and determined that the visitors complied with the policies and procedures of the program.

We found that the visitors worked normal hours. If more hours were worked or if they came to work on the weekend, it was generally due to an experiment that was being conducted. They also stated that they were not offered positions, and that after their terms ended, if foreign, they would be returning home to finish their educations. Requests to extend their stays for longer periods of time were due to their abbreviated work schedules, (not being able to work 40 hours per week, but still wanting to complete the equivalent amount of hours for the program) or because of wanting to see the results of their experiments. This was exemplified in the five visitors who were granted extended stays. Overall, most stated that they enjoyed their program and found them beneficial.

Visitor Evaluations
HOOP 125 - Observers states that, “Upon completion of the observership, the university recommends that the observer and the employee sponsor complete an evaluation of the observership to assess how well the plan objectives were met and as a mechanism for improving subsequent programs”. We asked eight Directors of Management Operations (DMO) if their departments were performing evaluations and discovered that none of them were formally asking the visitors about their experience in the program or asking them to complete an evaluation after their program term ends. Although HOOP 125 only "recommends" that the departments perform this task, we suggest that they consider implementing an evaluation program.

After Hour Building Observations
We performed after-hour observations at two of the institution’s buildings (IMM and the Medical School) to determine: 1) if people were coming into the building without the appropriate access, 2) if people were inappropriately working in the building, and 3) if we noticed any unusual or suspicious activity occurring.

Based on our observations we did not see or hear of any suspicious activity. Individuals coming into the building used their ID Badges. On instances when we saw individuals shadow another into the building, we questioned them and ID Badges were produced.

We spoke with the front desk security guards at both buildings and noted they had no unusual activity to report, such as having the visitors work extended hours throughout the night or sneaking people into the building for after hour work. We also walked through the lab rooms and hallways of several floors and identified nothing unusual.

Improvements suggested by the visitors and DMOs that are not already in-place include: 1) communicating application process changes well in advance of pending deadlines, 2) giving more lead time to process the applications before the visitors' intended stay, and 3) developing a way to enable electronic submission of the application and secure routing of it to the bevy of approving departments.
CONCLUSION

The controls over monitoring and supervising the Observers, Trainees, and Visiting Scientists program are working as intended. The application process is being revised, updated, and improved as needed.

Controls over monitoring could be strengthened if the Office of Academic & Research Affairs and Office of Global Health Initiatives: 1) record the applicant’s key data into an application that performs data manipulation and trend analysis, 2) determine the feasibility of developing an electronic submittal process for the application, and 3) require that the visitor and the employee sponsor complete an evaluation of the program to assess how well the plan objectives were met and as a mechanism for improving subsequent programs.

We would like to thank the Offices of Academic & Research Affairs, Office of Global Health Initiatives, Office of International Affairs, Human Resources, and the individual managers throughout the institution who assisted us during our review.

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