



Commonwealth of Massachusetts  
Office of the State Auditor  
Suzanne M. Bump

*Making government work better*

Official Audit Report – Issued March 26, 2020

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## Quinsigamond Community College

For the period July 1, 2017 through March 31, 2019





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*Making government work better*

March 26, 2020

Dr. Luis Pedraja, President  
Quinsigamond Community College  
670 West Boylston Street  
Worcester, MA 01606

Dear Dr. Pedraja:

I am pleased to provide this performance audit of Quinsigamond Community College. This report details the audit objectives, scope, methodology, finding, and recommendation for the audit period, July 1, 2017 through March 31, 2019. My audit staff discussed the contents of this report with management of the college, whose comments are reflected in this report.

I would also like to express my appreciation to Quinsigamond Community College for the cooperation and assistance provided to my staff during the audit.

Sincerely,

A handwritten signature in blue ink, appearing to read "SMB", written over a light blue circular background.

Suzanne M. Bump  
Auditor of the Commonwealth

cc: Susan M. Mailman, Chair of the Board of Trustees, Quinsigamond Community College

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## LIST OF ABBREVIATIONS

CORI	Criminal Offender Record Information
ECE	early childhood education
EEC	Department of Early Education and Care
HR	Human Resources Department
QCC	Quinsigamond Community College
SORI	Sex Offender Registry Information

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## EXECUTIVE SUMMARY

In accordance with Section 12 of Chapter 11 of the Massachusetts General Laws, the Office of the State Auditor has conducted a performance audit of Quinsigamond Community College (QCC) for the period July 1, 2017 through March 31, 2019.

In this performance audit, we examined QCC's process to ensure compliance with background check requirements for students in early childhood education (ECE) courses and the staff and faculty of QCC's Children's School. We also reviewed the Children's School's records to determine whether QCC complied with the state Department of Early Education and Care's licensing guidelines for securing the safety of children.

Below is a summary of our finding and recommendation, with links to each page listed.

<b>Finding 1</b> <b>Page <a href="#">6</a></b>	QCC did not ensure that all students enrolled in its ECE courses had undergone required background checks.
<b>Recommendation</b> <b>Page <a href="#">7</a></b>	QCC should develop a documented process to ensure that all students in ECE courses have had the required background checks.

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## OVERVIEW OF AUDITED ENTITY

Quinsigamond Community College (QCC) was established by Section 5 of Chapter 15A of the Massachusetts General Laws. QCC operates under the direction of a board of trustees, whose members are appointed by the Governor. The board is responsible for operating under the regulations promulgated by the state's Board of Higher Education. The president of QCC reports to the board of trustees and is the administrative head of the college.

QCC is a member of the Massachusetts public higher-education system, which consists of 15 community colleges, 9 state universities, and 5 University of Massachusetts campuses. According to QCC's website,

*The college is an accredited, public two-year institution offering over 120 associate degree and certificate options in business, healthcare, technology, liberal arts, and human services. QCC offers a wide variety of non-credit courses, workshops, and seminars through its Center for Workforce Development and Continuing Education.*

The main campus is at 670 West Boylston Street in Worcester; 13 satellite sites are located throughout Worcester County.

### Early Childhood Education Program

QCC's Early Childhood Education (ECE) Program prepares students for work in early education and care or other child-related fields. Students develop skills and knowledge related to ECE through courses as well as hands-on experience at weekly off-campus field placements and at QCC's Children's School. To ensure that students are suitable to work with children, QCC requires all students who are enrolled in ECE courses to have Criminal Offender Record Information (CORI)<sup>1</sup> checks and Sex Offender Registry Information (SORI)<sup>2</sup> checks.

As students advance through QCC's ECE Program, they are required to take capstone courses. Capstone courses are usually taken during a student's second year of study and include interaction with children. All students participating in capstone courses are required to have fingerprint-based checks. Fingerprint-based checks provide information that is maintained by the Federal Bureau of Investigation in its Integrated Automated Fingerprint Identification System. This information is in greater depth than CORI or SORI checks and includes criminal activity outside the Commonwealth.

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1. A CORI check provides information about an individual's history of criminal activity. The check contains only Massachusetts information, with a few exceptions.
  2. A SORI check determines whether an individual is a registered level 2 or 3 sex offender in Massachusetts. If so, it provides information about any offenses of which the individual was convicted and the dates of any convictions.

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## **The Children's School**

QCC's Children's School provides daycare programs to QCC's students, staff, and faculty, as well as members of the community, for their children ages two years and nine months to five years. Additionally, students in certain ECE courses train at the school. The Children's School is licensed by the Massachusetts Department of Early Education and Care (EEC). To comply with EEC's licensing requirements, QCC requires each Children's School faculty and staff member to pass a CORI check, a SORI check, and a fingerprint-based check. When these are completed, EEC issues a suitability letter, which is a letter indicating that an individual had no criminal records at the time of the background checks and that EEC has therefore determined the individual to be suitable to work in a childcare setting.

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## AUDIT OBJECTIVES, SCOPE, AND METHODOLOGY

In accordance with Section 12 of Chapter 11 of the Massachusetts General Laws, the Office of the State Auditor has conducted a performance audit of certain activities of Quinsigamond Community College (QCC) for the period July 1, 2017 through March 31, 2019.

We conducted this performance audit in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our finding and conclusions based on our audit objectives.

Below is a list of our audit objectives, indicating each question we intended our audit to answer; the conclusion we reached regarding each objective; and, if applicable, where each objective is discussed in the audit findings.

Objective	Conclusion
1. Does QCC ensure that background checks are conducted for students taking early childhood education (ECE) courses and for the faculty and staff of QCC's Children's School?	No; see Finding <u>1</u>
2. Does QCC's Children's School comply with the state Department of Early Education and Care's (EEC's) licensing requirements for securing the safety of children?	Yes

To achieve our objectives, we gained an understanding of QCC's internal control environment related to the objectives, reviewed college policies and procedures, and conducted inquiries with management.

Additionally, we performed the following procedures:

- To determine whether students in QCC's ECE courses had the required background checks, we obtained a list of all students enrolled in ECE courses during the audit period from the registrar and compared it to the list of Criminal Offender Record Information (CORI) and Sex Offender Registry Information (SORI) checks performed by the campus police.
- To determine whether students in the ECE Program's capstone courses had fingerprint-based checks, we obtained a list of students enrolled in capstone courses during our audit period from the registrar and compared it to fingerprint-based-check receipts maintained in students' ECE Program files.



- To determine whether the faculty and staff of the Children’s School had the required background checks, we obtained a list of all employees at the Children’s School from QCC’s Human Resources Department (HR) and reviewed completed reports of CORI, SORI, and fingerprint-based checks to verify that the checks had been performed for all individuals employed at the Children’s School during the audit period.
- To confirm that the Children’s School secured the safety of children at the facility and ensured compliance with EEC licensing requirements related to the security of children, we reviewed the school’s background check policies, personnel policies, incident logs, emergency plans, and fire drill log.

### **Data Reliability**

To test the reliability of the registrar’s data for students who took certain ECE courses and therefore required background checks, we obtained course lists from two ECE Program faculty members to trace the students back to the registrar’s list. To test the completeness and accuracy of QCC’s list of faculty and staff members at the Children’s School, which we obtained from HR, we obtained a current list of faculty and staff members from the director of the Children’s School to trace back to the HR list for reliability. Additionally, on all data sets, we tested for duplicates. Based on the results of these data reliability assessment procedures, we determined that the information obtained for our audit period was sufficiently reliable for the purposes of our audit work.

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## DETAILED AUDIT FINDINGS WITH AUDITEE'S RESPONSE

### **1. Quinsigamond Community College did not ensure that all students enrolled in its early childhood education courses had undergone required background checks.**

Quinsigamond Community College (QCC) could not substantiate that all students in early childhood education (ECE) courses had had required background checks. During our audit period, QCC had 259 students enrolled in ECE courses. We could not verify that the QCC campus police had performed Criminal Offender Record Information (CORI) and Sex Offender Registry Information (SORI) checks for 44 of the 259 students.

Furthermore, there were 61 students who participated in ECE Program capstone courses that required students to have fingerprint-based checks. QCC did not ensure that 17 of them had fingerprint-based checks before they began participating in the courses.

Without required background checks for students enrolled in ECE courses, there may be a risk to children in the care of facilities involved with the ECE Program.

### **Authoritative Guidance**

QCC's ECE Program website states that CORI/SORI checks are required of all students taking ECE classes. In addition, according to QCC's online student handbook,

*In order for a student to be eligible to participate in an academic, community or clinical program that involves potential unsupervised contact with children, the disabled, or the elderly, the student may be required to undergo a Criminal Offender Record Information (CORI) check and/or a Sex Offender Registry Information (SORI) check.*

In addition, Section 14 of Title 606 of the Code of Massachusetts Regulations requires CORI, SORI, and fingerprint-based checks for individuals affiliated with programs or facilities under the oversight of the state Department of Early Education and Care (EEC), such as the Children's School at QCC.

### **Reasons for Noncompliance**

QCC does not have a process to track whether students in ECE courses have the required background checks before participating in the courses.

## Recommendation

QCC should develop a documented process to ensure that all students in ECE courses have had the required background checks.

## Auditee's Response

*The college agrees with Finding 1, 44 ECE students did not have the required CORI/SORI checks on file and 17 capstone course students did not have required fingerprint checks on file.*

*Subsequent to the audit, and after careful consideration of Section 14 of Title 606 of the code of Massachusetts Regulations, the college has decided to modify their requirements for [background record checks, or BRCs]. BRCs will only be required when there is an ECE student observation or an ECE student supervised practicum that takes place at QCC's [Children's] School. The Director of the [Children's] School or his/her designee will validate that all required BRCs are completed and on file. If a student has not completed the required BRC, they will not be allowed to enter the QCC [Children's] School classrooms.*

*The 17 ECE capstone course students that did not have fingerprints checks on file were all participants in the "Fieldwork with Young Children I" course. Beginning in the Spring 2020 semester, all students registering for this course will not be able to self-register or register with an advisor. These students will be directed to the Coordinator of Early Childhood Education or his/her designee, who will assist these students with completing the required BRC process. This process has been proven effective with other capstone courses.*

## Auditor's Reply

It appears that QCC is taking measures to address this finding by ensuring that all students who perform observation and practicum work at the Children's School receive background checks and that the results are recorded and available for verification.