



OFFICE OF THE PRESIDENT  
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Oakland, California 94607-5200

March 10, 2021

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CHIEF HUMAN RESOURCES OFFICERS  
CAMPUS AND MEDICAL CENTER RISK MANAGERS  
CHIEF ETHICS AND COMPLIANCE OFFICERS  
HEALTHCARE COMPLIANCE OFFICERS

**Re: Implementation Guidance for Reporting Child Abuse and Neglect**

Dear Colleagues:

The California Child Abuse and Neglect Act (CANRA) requires employers, including the University, to identify “Mandated Reporters,” (individuals required to report observed or suspected child abuse or neglect to designated law enforcement or social service agencies) and to secure, as a condition of employment, acknowledgment of their status and reporting obligations.

The positions subject to this requirement were expanded as of January 1, 2021 by California State Assembly Bill 1963 (AB 1963). Technical revisions to the [Reporting Child Abuse and Neglect Presidential Policy](#) were issued on January 22, 2021 (effective January 1, 2021). Academic Personnel and Programs, Systemwide HR Policy, Risk Services, and Ethics, Compliance & Audit Services, in consultation with UC Legal, are providing the following guidance to assist locations with compliance with the updated CANRA policy.

**Updated Categories of Mandated Reporters**

The expanded definition of “mandated reporter” includes two additional categories:

1. A human resources employee, as defined, is an employee designated by the employer to accept complaints of discrimination, harassment, retaliation, etc., made under California’s Fair Employment and Housing Act (FEHA). A “human resources employee” may include academic personnel staff as well as employees in Human Resources, Title IX, AA/EEO, Employee and Labor Relations, or any other offices who are designated employees to receive complaints of harassment and discrimination based on categories protected under FEHA.
2. An adult person whose duties require direct contact with and supervision of minors in the performance of the minors’ duties in the workplace of a business subject to FEHA.

## **Mandated Reporter Identification, Training and Acknowledgment**

Due to the expanded definition of mandated reporters, it is expected that additional individuals at each location will be identified as mandated reporters. It is recommended that local Human Resources, Academic Personnel offices, legal counsel, Risk Management, and Compliance offices, work together to determine which employees are mandated reporters. These offices should also work together to examine local processes that are in place for identifying mandated reporters.

Mandated reporter acknowledgment forms (see Appendix B of Reporting Child Abuse and Neglect policy) should be signed within 30 days of an employee's identification as a mandated reporter, whether an employee is hired or promoted into an applicable position. Completed acknowledgment forms should be maintained in employee personnel files.

Some UC locations have determined that all employees should be identified and trained as mandated reporters in order to mitigate risk. It is recommended that locations track the number of mandated reporters identified, how many mandated reporters have completed the training, and whether mandated reporters have signed the acknowledgment form. This information should be reported to local senior leadership in order to help identify areas needed to improve compliance with the policy.

CANRA training is available in the UC Learning Center. The training is currently being updated by the vendor for legal and accessibility requirements. We expect the updated training to be available for employees by late March 2021. You will be notified when the training has been updated.

## **Reporting Requirements**

**External Reports.** Mandated reporters must report observed or suspected child abuse or neglect to agencies designated to receive such reports. These include police and sheriffs' departments, such as the UC Police Department, and county welfare departments. See [California Department of Social Services, Report Suspected Child Abuse or Neglect](#) for a current list of Child Protective Services hotlines across California. Initial external reports must be made immediately, by telephone, and followed by written reports as soon as reasonably practicable but in any event within 36 hours. A written report must include the information described in Section 11167(a) of the Act and may be submitted on form BCIA 8572, available at [Suspected Child Abuse Report Form and Instructions](#)). Note that local agency procedures may vary. ***Failure to make a mandated external report may result in criminal penalties.***

**Internal Reports.** Under the CANRA policy, anyone who is required to make an external report must also make internal reports, as further described below. This *internal* reporting requirement does not apply to: (1) clinicians or staff who identify abuse or neglect in connection with the provision of mental health services through Faculty and Staff Assistance Programs; nor (2) victim advocates employed by or volunteering in campus resource or advocacy centers who identify abuse or neglect in connection with their confidential work as advocates.

All mandated reporters other than those working at University healthcare facilities must promptly report observed or suspected child abuse or neglect to their supervisors or through the

University Compliance Hotline (by phone: 1-800-403-4744 or at [Whistleblower Hotline, http://www.universityofcalifornia.edu/hotline/](http://www.universityofcalifornia.edu/hotline/)). Supervisors who receive reports should promptly forward those reports to the Hotline. These internal reports may be made anonymously.

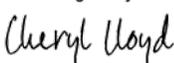
We appreciate your cooperation to ensure that UC is in compliance with CANRA. **Please update local policies and procedures regarding the CANRA revisions.**

Questions relating to academic personnel may be directed to Lisa Ha at [Lisa.Ha@ucop.edu](mailto:Lisa.Ha@ucop.edu). Questions related to staff employees may be directed to Abby Norris at [Abigail.Norris@ucop.edu](mailto:Abigail.Norris@ucop.edu). Questions relating to risk management may be directed to Gary Leonard at [Gary.Leonard@ucop.edu](mailto:Gary.Leonard@ucop.edu). Questions relating to compliance may be directed to Irene Levintov at [Irene.Levintov@ucop.edu](mailto:Irene.Levintov@ucop.edu).

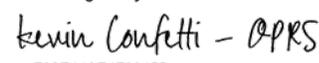
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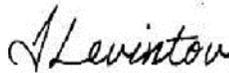
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Kevin Confetti  
Interim Chief Risk Officer/  
Deputy Chief Risk Officer  
Risk Services



Irene Levintov  
Chief of Staff and  
Interim Director of Compliance  
Ethics, Compliance & Audit Services

cc: President Drake  
Chancellors  
Laboratory Director Witherell  
Provost and Executive Vice President Brown  
Executive Vice President and Chief Operating Officer Nava  
Senior Vice President and Chief Compliance Officer Bustamante  
Assistant Vice Provosts/Vice Chancellors/Directors - Academic Personnel  
Deputy General Counsel Woodall  
Chief of Staff and Executive Director Henderson  
Associate Vice Provost Lee  
Executive Director Baxter  
Executive Director Leonard  
Executive Director Silas  
Chief of Staff Peterson  
Senior Counsel Chin  
Systemwide Title IX Director Taylor  
Director Grant  
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Director Sykes

Manager Smith

HR Manager Crosson

Policy Specialist Norris

Analyst Ha

Analyst Wilson