



Internal Audit Report

Donations Review (systemwide)

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Performed By

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Approved

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Introduction and Background

As part of the annual fiscal year 2021-2022 audit plan, Audit & Management Advisory Services (AMAS) completed a retrospective review of donations to UC Santa Cruz and local Senior Management Group (SMG) personnel data to identify undergraduate admissions decisions that could have been influenced by these donations or personnel. This review was initiated in response to a recommendation from the June 2019 systemwide internal audit of undergraduate admissions.

Objectives and Scope

The objective of this review was to perform data analytics to identify undergraduate admissions decisions that could have been influenced by donations to UC Santa Cruz or the applicant's relationship to an SMG member.

The scope of the review included the following:

- Donations received by UC Santa Cruz during the period January 1, 2018 through August 31, 2021.
- SMG personnel active from January 1, 2018 through August 31, 2021.
- Applications for undergraduate admission submitted from November 1, 2018 through March 31, 2021 for the 2019-20 and 2020-21 academic years (date range includes both the regular and late application periods).

Approach

To conduct this review, AMAS performed the following procedures:

- Obtained a dataset of donations received during the audit period.
- Obtained a dataset of local SMG personnel active during the audit period.
- Obtained a dataset of applications for undergraduate admission submitted during the audit period.
- Performed data analysis to identify admissions of applicants who may be related to donors who made cumulative donations of \$10,000 or more and/or SMG personnel active during the audit period. Data fields compared across datasets to identify "matches" included all or a subset of the following:
 - Names of donors and donors' spouses
 - SMG employees and/or SMG employees' spouses
 - Names of admitted students and parents
 - Addresses
 - Email addresses
 - Phone numbers
 - Foundations or businesses with the same name as the admitted student
 - Campus ID number

- The donations portion of the analysis was limited to cumulative matching donations of \$10,000 or more received during the audit period.
- Reviewed data trends and other available information to assess the risk of questionable admissions decisions (i.e., those at risk of being influenced by donations or applicant’s relationship to an SMG member) for the “matches” identified. Criteria/factors considered as part of this assessment included all or a subset of the following:
 - Dollar amount of the donation
 - Unusual or suspicious pattern or timing of giving
 - Timing of personnel actions under SMG employee’s authority
 - Unusual or suspicious communication with donor or SMG employee
 - Applicants admitted by exception
 - Applicants admitted to a school with impacted majors
 - Applicants who were recommended for admission on basis of special talent
 - Lack of participation in special talent for which the application was recommended
 - Low application review scores/ratings
 - Department or program to which donations have been directed as well as their specified purpose
- Provided the results of the risk assessment to the Locally Designated Official to determine whether to further investigate any of the matches.

Overall Conclusion

AMAS analysis identified 25 admissions of applicants who may be related to donors who gave a cumulative amount of at least \$10,000 during the audit period. Within those results, we noted one admission that may be related to four donors. Further, AMAS identified 6 admissions of applicants who may be related to SMG personnel active during that time. Based on the risk assessment performed on those matches, AMAS flagged¹ nine medium and 25 low priority admissions for the Locally Designated Official to prioritize for further analysis and/or investigation².

¹ Determination of risk rankings was based on auditor judgment.

² Referral to the Locally Designated Official for further analysis is not necessarily indicative of improper influence or actions associated with the admissions decision.