

THE REGENTS OF THE UNIVERSITY OF CALIFORNIA
OFFICE OF ETHICS, COMPLIANCE AND AUDIT SERVICES



1111 Franklin Street, 5th Floor • Oakland, California 94607-5200 • (510) 987-0479 • FAX (510) 287-3334

Alexander Bustamante
SENIOR VICE PRESIDENT
CHIEF COMPLIANCE AND AUDIT OFFICER

March 31, 2020

DIRECTOR YOON-WU

RE: Final Report Project No. P20A005: Systemwide Audit of Undergraduate Admissions – Phase 2

Attached are a summary of audit procedures and results along with a copy of the final management corrective actions specific to the Systemwide Office of Undergraduate Admissions for Audit Services Project No. P20A005: Systemwide Audit of Undergraduate Admissions – Phase 2. With the issuance of this memo, we acknowledge acceptance of these management corrective actions from your office. We very much appreciate the assistance provided to us by you and members of your staff during our review. Should you have any questions, please feel free to contact me at 510-987-9646 (email: matthew.hicks@ucop.edu).

A handwritten signature in black ink, appearing to read "Matt Hicks".

Matt Hicks
Systemwide Deputy Audit Officer

Attachments

cc: Senior Vice President Bustamante
Provost Brown
Interim Vice President Gullatt
Systemwide Associate Audit Director Cataldo
Systemwide Principal Auditor Sinutko

ATTACHMENT A – Summary of Audit Procedures and Results

Objective	Summary of Procedures	UCOP Results (Systemwide Undergraduate Admissions)	Recommendation References
Special Talent Admissions			
<p>Evaluate the effectiveness of Systemwide Undergraduate Admissions’ annual process to verify undergraduate application information.</p>	<p>Identified and obtained the population of applicants that underwent the application verification process during the audit period and then randomly selected a sample of applicants for review. Obtained documentation supporting each verified item and assessed its adequacy.</p> <p>Identified and obtained the population of permanent verification excusals granted during the audit period and then reviewed all excusals for the audit period. Obtained documentation supporting each permanent excusal, including any documented approval, and assessed its adequacy.</p> <p>Based on testing results, identified any concerns, control deficiencies, and/or opportunities for improvement, including additional controls and refinement of management corrective actions recommended in the initial review of control design.</p>	<p><u>Insufficient Verification Documentation</u> We identified several verification sample items that lacked sufficient documentation. Specifically, we observed that items were missing, incomplete, or lacked characteristics demonstrating authenticity.</p> <p><u>Issues Identified with Permanent Excusals</u> We identified concerns with the majority of permanent excusals tested in the following areas:</p> <ul style="list-style-type: none"> • Lack of Reviewer Follow-up • Missing Verification Forms • Incorrect Items Verified • Alternate Documentation Not Requested 	<p>Recommendation B.1 addresses adherence to retention requirements and internal verification guidelines.</p> <p>Recommendation B.2 addresses enhancement of internal verification guidelines and applicant instructions.</p> <p>Recommendation B.3 addresses updating procedures and, if necessary, the contract with the third party to align application verification documentation retention requirements with the UC Records Retention Schedule.</p>

ATTACHMENT A – Recommendations and Management Corrective Actions

Objective	Summary of Procedures	UCOP Results (Systemwide Undergraduate Admissions)	Recommendation References
Admissions by Exception			
Gain an understanding of and briefly describe and document the categories of acceptable rationale for admission by exception and existing requirements for admission by exception.	Gained an understanding of the categories of acceptable rationale and existing requirements for admissions by exception.	<p>The 2005 BOARS guidance specified the recommended categories to consider for Admission by Exception, however, we noted that the criteria within these recommended categories appears to be contradictory.</p> <p>In October 2019, the California Legislature enacted Assembly Bill (AB) 1383, which specifies requirements for admissions by exception.</p>	<p>Recommendation D.1 addresses inconsistencies in BOARS guidance.</p> <p>Recommendation D.2 addresses implementation guidance for AB 1383.</p>

ATTACHMENT B – Recommendations and Management Corrective Actions

Recommendation	Management Corrective Action	Target Date
<p>B. Application Verification Process</p> <p>B.1 Ensure adherence to its retention requirements and internal verification guidelines, which describe acceptable forms of documentation, by annually testing a sample of applicant verification submissions approved by its contractor.</p>	<p>Undergraduate Admissions will ensure adherence to retention requirements and internal verification guidelines, which describe acceptable forms of documentation, by annually testing a sample of applicant verification submissions approved by the vendor used for the verification process.</p> <p>Responsible party: Han Mi Yoon-Wu, Systemwide Admissions Director</p>	<p>July 1, 2020</p>

ATTACHMENT B – Recommendations and Management Corrective Actions

Recommendation	Management Corrective Action	Target Date
<p>B.2 Enhance its internal verification guidelines and applicant instructions (as applicable) to include:</p> <ul style="list-style-type: none"> • A requirement that reviewers follow up with applicants to obtain requested documentation, particularly when applicants have requested a reasonable deadline extension or indicated that they can at least partially document an item, unless an applicant indicates sensitive or highly personal related circumstances, as specified in the Verification Guidelines. If the applicant cannot provide the requested documentation, the reviewer should document the reason that the applicant was unable to provide it. • For applicants who request extensions beyond an acceptable date or indicate that they cannot provide the requested documentation, a requirement that Systemwide Undergraduate Admissions select a different item. • Requirements that Systemwide Undergraduate Admissions will be the sole authorizing party for all verification excusal decisions and will document both the rationale for and the individuals who authorize each excusal. • Specific excusal decision requirements, such as the minimum number and position titles of Systemwide Undergraduate Admissions staff authorized to approve excusals. 	<p>Undergraduate admissions will enhance its internal verification guidelines and applicant instructions (as applicable) to include:</p> <ul style="list-style-type: none"> • A requirement that reviewers follow up with applicants to obtain requested documentation, particularly when applicants have requested a reasonable deadline extension or indicated that they can at least partially document an item, unless an applicant indicates sensitive or highly personal related circumstances, as specified in the Verification Guidelines. If the applicant cannot provide the requested documentation, the reviewer should document the reason that the applicant was unable to provide it. • For applicants who request extensions beyond an acceptable date or indicate that they cannot provide the requested documentation, a requirement that Systemwide Undergraduate Admissions select a different item. • Requirements that Systemwide Undergraduate Admissions will be the sole authorizing party for all verification excusal decisions and will document both the rationale for and the individuals who authorize each excusal. • Specific excusal decision requirements, such as the minimum number and position titles of Systemwide Undergraduate Admissions staff authorized to approve excusals. <p>Responsible party: Han Mi Yoon-Wu, Systemwide Admissions Director</p>	<p>April 1, 2020</p>

ATTACHMENT B – Recommendations and Management Corrective Actions

Recommendation	Management Corrective Action	Target Date
<p>B.3 Update its procedures and, if necessary, its contract with the third party to align application verification documentation retention requirements with the UC Records Retention Schedule.</p>	<p>Undergraduate Admissions will update its procedures and, if necessary, its contract with the third party to align application verification documentation retention requirements with the UC Records Retention Schedule.</p> <p>Responsible party: Han Mi Yoon-Wu, Systemwide Admissions Director</p>	July 1, 2020
<p>D. Admission by Exception</p> <p>D.1 In coordination with BOARS:</p> <ul style="list-style-type: none"> • Develop and issue guidance clarifying the characteristics of “disadvantaged students” as defined by Regents Policy 2105. • Define a standardized set of categories to be included as part of the “other students” category specified in Regents Policy 2105. 	<p>In coordination with BOARS, Undergraduate Admissions will:</p> <ul style="list-style-type: none"> • Develop and issue guidance clarifying the characteristics of “disadvantaged students” as defined by Regents Policy 2105. • Define a standardized set of categories to be included as part of the “other students” category specified in Regents Policy 2105. <p>Responsible party: Han Mi Yoon-Wu, Systemwide Admissions Director</p>	July 1, 2020

ATTACHMENT B – Recommendations and Management Corrective Actions

Recommendation	Management Corrective Action	Target Date
<p>D.2 Develop and issue guidance to ensure campuses have consistent policies and procedures to comply with AB 1383. The guidance, at a minimum, should include the following for all Admissions by Exception:</p> <ul style="list-style-type: none"> • Establishment of a policy that applies articulated standards for Admissions by Exception decisions, including minimum procedural requirements and an explanation for choosing the standards that supports their application as fair and appropriate • Documentation of employees involved in the evaluation of applications for Admissions by Exception • Approval by a minimum of three senior campus administrators • Definition of senior campus administrator • For Admissions by Exception into athletic programs, establish a policy requiring student program participation for a minimum of one academic year 	<p>Undergraduate Admissions will develop and issue guidance to ensure campuses have consistent policies and procedures to comply with AB 1383. The guidance, at a minimum, should include the following for all Admissions by Exception:</p> <ul style="list-style-type: none"> • Establishment of a policy that applies articulated standards for Admissions by Exception decisions, including minimum procedural requirements and an explanation for choosing the standards that supports their application as fair and appropriate • Documentation of employees involved in the evaluation of applications for Admissions by Exception • Approval by a minimum of three senior campus administrators • Definition of senior campus administrator • For Admissions by Exception into athletic programs, establish a policy requiring student program participation for a minimum of one academic year <p>Responsible party: Han Mi Yoon-Wu, Systemwide Admissions Director</p>	<p>July 1, 2020</p>