

October 31, 2019

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**Subject:            *Undergraduate Student Admissions  
Report 2019-60***

Audit & Management Advisory Services (AMAS) has completed a Phase I review of Undergraduate Student Admissions as part of a Systemwide Audit of Undergraduate Admissions, under the direction of the University California Office of the President (UCOP). This report supplements the Systemwide Audit of Undergraduate Admissions, Project No. P19A019 finalized June 2019 by the Office of Ethics, Compliance, and Audit Services (ECAS) (Addendum 1).

### **Background**

UC San Diego (UCSD) is recognized as one of the top 15 research universities worldwide. The University organizes the undergraduate experience around a College system of six small colleges, each comprised of about 4,700 students, which allows the student to access personalized advising, support services and leadership opportunities all within one of the best research institutes in the world.

UCSD received over 118,000 applications for the 2019-20 academic year. UCSD uses a holistic review process that entails considering the full spectrum of applicant qualifications viewed in context of an applicant's education environment and background. This review process is based on all evidence provided in the application as well as traditional quantitative measures of academic achievement (GPA and test scores) and other pertinent qualifications including extracurricular activities, leadership, community involvement, distinctive talents and challenges or hardships overcome. No single factor plays a deciding role in the decision process; it is a combination of the entire student application. Each application has at a minimum two independent reads by humans that are scored and added to the comprehensive review. If the two reader's scores are more than one point apart, a third reader will review and score the applicant, and that will be the final overriding score. This score is only one piece of the holistic review; there are no weights given to any one factor; everything is considered collectively.

UCSD has a Committee on Admissions that consists of faculty members who manage and set the policy for Admissions to implement operationally. The Committee has delegated the authority to make the final admission decision with the Admission Selection Team, which is comprised of the Associate Vice

Chancellor of Enrollment Management, Director of Admissions, Senior Associate Director of Admissions and the Enrollment Management Data Analyst in consultation with Institutional Research.

This audit assessed the design of internal controls over the UCSD admissions process and related processes. In Fiscal Year 2019-2020, UCOP will oversee Phase II of the Systemwide Audit of Undergraduate Admissions, which will assess the campus adherence to controls over undergraduate admissions and the operating effectiveness of controls identified in this review. In addition, UCSD will move to a Division one, non-football University in the Fall of 2020, adding to the need for evaluation of internal controls, policies and procedures that may differ from current practices and presenting opportunities for further improvement.

### **Audit Objective, Scope and Procedures**

The objective of our review was to evaluate undergraduate student admission practices including key internal controls, policies and procedures, the authority for admission decisions, and supporting documentation in the area of admissions in general, and specifically in the area of admissions under exceptional approval processes, to reduce exposure to potential admissions fraud risk. In order to achieve our objective, we performed the following procedures:

- Reviewed systemwide and local policies and procedures for undergraduate admissions;
- Reviewed audit reports and published articles regarding the “Varsity Blues” nationwide college admissions scam;
- Interviewed Admissions Management to gain an understanding of the admission process for both freshman and transfer admissions from the original application submittal to the admissions decision;
- Interviewed Athletics Department Management and Compliance to gain an understanding of internal controls, processes and procedures for recruiting student athletes;
- Completed a detailed process walkthrough and review with the Management teams from Admissions and Athletics, based on a UCOP-developed audit questionnaire, regarding policies, information technology systems, approval authorities and other documentation used as part of the complete admissions process;
- Obtained and reviewed user roles and responsibilities for the IT systems used in the Admissions process;
- Reviewed in detail the special audit conducted by Athletics Compliance regarding students on the Prospective Student Athlete List in Fall 2018; and
- Reviewed the Systemwide Audit Report (Addendum 1) and the Recommendation provided by UCOP (Addendum 2) and facilitated the development of the Management Corrective Actions by Admissions and Athletics Department Management per UCOP recommendations (Addendum 2).

The scope of this audit included review of systemwide and local policies and procedures for undergraduate admissions in addition to the review, evaluation and completion of UCOP-provided walkthrough questions regarding the admission process; admissions by exception, non-standard admission practices from Athletics and other departments, verification of application data, and the process and control over monitoring athlete participation in recruited programs.

**Conclusion**

Based on our review procedures, we concluded that UCSD has a number of key internal controls in place to monitor and safeguard the undergraduate student admission practices including adherence to policies and procedures, authority to make admission decisions, and supporting documentation in the area of admissions in general, and specifically in the area of admissions under exceptional approval processes. However, we also noted opportunities to strengthen controls further and reduce exposure to potential fraud risk, which are described further below.

**Summary of Systemwide and Local Observations and Recommendations**

We noted some opportunities to enhance local admissions and athletics processes which were consistent with areas identified in the Systemwide Audit of Undergraduate Admissions report. These opportunities for improvement at UCSD include: enhancing the documentation of local admissions policies and procedures; implementing controls to log activity in admissions IT systems and reviewing log activities at key points in the admission cycle; implementing policy and procedures addressing conflict of interest requirements for athletics personnel to prevent conflicts of interest in athletics recruitment; establishing policy requiring minimum level of participation requirement for non-scholarship student athlete; and implementing processes ensuring records supporting ongoing participation in athletics are kept current throughout the season. The recommendations and management corrective actions that address the above observations are described in detail in Addendum 2 (recommendations 1.1, 6.2, 8.1, 9.1, and 9.3).

We also noted two local UCSD-specific opportunities for improvement which were not addressed in the Systemwide review. One issue was regarding the nomenclature of the excel file list of active recruits, or prospective student athletes (PSAs), provided by Athletics to Admissions each year. The Athletics Department referred to the list of recruited PSAs as the “admit list” in person and the name of the excel file. Admissions Management stated that this list does not guarantee admission because the PSAs application files have to follow the same admission process as the general applicants and meet the Preliminary Guidelines for Athletic Admissions. The difference in what Athletics and Admissions Department Management staff called this list could lead to misinterpretation of the involvement of the Athletic Department with the admission of student athletes. During this review, Athletics Management changed practices to now use language consistent with Admissions (“Prospective Student Athlete (PSA) list”), staff have been educated, and all documents going forward will reflect proper nomenclature. This management corrective action is included at the end of Addendum 2.

The second local issue was based on an improved internal control that the Athletics Department was working on implementing, a new student hotline specific to student athletes to provide additional opportunity for students to report wrongdoings or concerns. During this review, Athletics Management has implemented a reporting system that allows student-athletes to submit real-time reports of any issues/concerns through a system called Real Recruit. This management corrective action is also included at the end of Addendum 2.

Audit & Management Advisory Services appreciates the cooperation and assistance provided during the review. We will contact you at the appropriate time to evaluate the status of the management corrective actions indicated in the report.

UC policy requires that all draft audit reports be destroyed after the final report is issued.

If you have any questions regarding this report, please call me at 534-1191.

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**ADDENDUM 1:** Systemwide Audit of Undergraduate Admissions, Project No. P19A019 Final Audit Report

**ADDENDUM 2:** Audit of Undergraduate Admissions Management Corrective Actions-UCSD: AMAS Report 2019-60, UCOP Project no. P19A019

UNIVERSITY OF CALIFORNIA  
ETHICS, COMPLIANCE AND AUDIT SERVICES  
OFFICE OF THE PRESIDENT  
INTERNAL AUDIT SERVICES

SYSTEMWIDE AUDIT OF UNDERGRADUATE ADMISSIONS  
Project No. P19A019  
June 2019

## **Executive Summary**

### **Introduction**

In response to recent nationwide issues involving third parties exploiting vulnerabilities in college admissions processes specifically related to athletics, the University of California (UC) took the opportunity to assess not only its controls over athletic admissions, but its entire admissions process to ensure that it has strong controls in place to reduce its exposure to third party interference. Accordingly, the UC systemwide Office of Ethics, Compliance and Audit Services (ECAS) has amended its fiscal year 2018-19 audit plan to include a systemwide audit of undergraduate admissions. This audit was performed in coordination with the internal audit departments at all undergraduate UC campuses using a common systemwide audit program.

This summary report was developed based on information gathered by each location's internal audit department and provides a consolidation of the systemwide findings and a set of systemwide recommendations. Each campus's internal audit department will issue a separate report addressing its local observations and associated planned management corrective actions, as well as corrective actions to address each of the systemwide recommendations identified in this report.

This audit assessed the design of internal controls over the admissions process and related processes. In fiscal year 2019-2020, ECAS will oversee a second audit of admissions to assess the operating effectiveness of controls identified in this review.

### **Objectives and Scope**

In the fourth quarter of fiscal year 2018-19, ECAS directed all internal audit departments at campuses with undergraduate programs to set aside hours in their annual audit plans for a systemwide audit of admissions. The objective of the audit was to evaluate the design of controls over undergraduate admissions throughout the system, including controls over admission of student athletes and other non-standard admissions, that facilitate compliance with relevant policies and regulations and reduce exposure to potential admissions fraud risk.

Audit procedures were conducted at each of the nine UC campuses with undergraduate programs and at the Office of the President using a common audit program developed for this review by ECAS. These procedures included process walkthroughs and reviews of policies and other documentation used as part of the admissions process. The audit assessed the design of controls that campus internal audit departments identified in the process walkthroughs. However, we did not assess the organization's adherence to these controls as part of this audit. A second audit, scheduled for fiscal year 2019-2020, will assess the operating effectiveness of controls identified in this review, including any effects that may be found as a result of potential deficiencies.

The scope of this audit included a review of the following areas:

- Systemwide and local policies and procedures for undergraduate admissions
- The admissions process, including freshman and transfer admissions
- Processes associated with implementation of admissions by exception as defined by Regental policy
- Any non-standard admissions practices and/or ancillary processes feeding into the admissions process, such as recommendations for admission from athletics and other departments
- Processes to verify information on undergraduate admissions applications, including academic credentials and achievements outside of the classroom
- Processes and controls over student athletes' participation in the athletic programs for which they were recruited

ECAS coordinated this audit and oversaw the work performed by the campus internal audit departments. The local internal audit teams collected information as part of this audit and provided it to ECAS for the development of this report. ECAS reviewed this information and requested clarification and additional information as necessary. Upon issuance of this report, each campus's internal audit department will work with campus management to identify appropriate campus-specific management corrective actions, with assigned target dates, to address each of the recommendations in this report, as well as any local observations. The campus internal audit departments, with oversight from ECAS, will track these management corrective actions to ensure completion.

### **Overall Conclusion**

While admissions processes vary from campus to campus, we observed that, in general, each campus does have certain controls over the admissions process to address compliance with policy. We also identified controls within athletics and admissions to address admissions fraud risk. However, we found that several opportunities exist to strengthen these controls and further reduce the risk of admissions fraud in the following areas:

- Documentation supporting the admissions process
- Verifying application information
- Special talent admissions
- Admissions by exception
- Conflict of interest in admissions review
- Admissions IT system access
- Athletics department recommendation limits
- Conflict of interest in athletics
- Monitoring student athletes' participation in athletic programs
- Independence of athletics compliance
- Monitoring of donations and admissions

These opportunities for improvement and associated recommendations are described in detail in this report.

## Background

### *Overview of the University of California Admissions Process*

The nine UC undergraduate campuses vary significantly with respect to the specific details of the processes that they use to evaluate applications for undergraduate admission. Nonetheless, the campuses' processes share a similar overall sequence of events. Applicants begin the process by applying to one or more UC campuses through the University's "My UC Application" website. The systemwide Department of Undergraduate Admissions (Systemwide Undergraduate Admissions) then distributes applicants' information to the respective campuses to which they have applied for admission. During the application submission period, trained readers at campus admissions offices begin to review and evaluate applications using the comprehensive review process, which we describe later in this report. As part of comprehensive review, campus admissions offices also identify certain applicants who do not meet minimum academic requirements to be considered for an exception as permitted by policy. As a result of their comprehensive reviews of applications, campus admissions offices assign an evaluation to each application.

Once the application deadline has passed and the University has distributed all applications to the campuses, the campus admissions and enrollment management offices and local Academic Senate admissions committees coordinate to determine the population of students that they can accept. These population determinations allow the admissions offices to make provisional admissions decisions. After the admissions offices perform quality checks of their application evaluations, they finalize their admissions decisions and send decision letters to applicants. Admitted applicants then have time to accept or decline the campuses' offers and return a statement of intent to register if they accept an offer. Finally, all campuses require applicants who accept offers of admission to verify their grades and standardized test scores by requesting that their schools and testing organizations, respectively, send corresponding documentation directly to campus admissions offices.

### *Role of the Academic Senate*

The Board of Regents has empowered the Academic Senate to exercise direct control over academic matters of central importance to the University. The Academic Senate's scope of authority includes determining academic policy, setting conditions for admission and the granting of degrees, authorizing and supervising courses and curricula, and advising the administration on faculty appointments, promotions, and budgets.

The Academic Senate established its Board of Admissions and Relations with Schools (BOARS) to provide faculty oversight of undergraduate admissions. BOARS regulates the policies and practices used in the admissions process that are specific to the University's educational mission and the welfare of its students, and also recommends and directs efforts to improve the admissions process.

### *Admissions Requirements*

The admissions requirements for UC are the minimum academic standards that a student must attain to be considered for admission. However, meeting the minimum standards does not



guarantee admission. Specific minimum qualifications for freshman applicants include A-G subject requirements (see Appendix 2), examination requirements (SAT with Essay or ACT with Writing scores), and a minimum GPA of 3.0 for California residents and 3.4 for non-residents. Applicants who do not meet UC’s minimum requirements may be considered if they score high on the ACT with Writing or the SAT and two SAT subject tests. UC also requires applicants to be proficient in the English language.

*Comprehensive Review*

The nine UC undergraduate campuses independently review each application for admission using a process known as comprehensive review. The comprehensive review process was adopted by the Board of Regents in 2001 with the implementation of Regents Policy 2104 (Policy on Comprehensive Review in Undergraduate Admissions), which states that “students applying to UC campuses are evaluated for admission using multiple measures of achievement and promise while considering the context in which each student has demonstrated academic accomplishment.” Under comprehensive review, evaluators may look beyond test scores and grades to evaluate an applicant’s academic achievements by considering factors other than traditional academic performance, such as applicants’ high school environment, personal accomplishments, family environment, and other circumstances.

BOARS developed guidelines for selection criteria under comprehensive review, including specific factors that campuses may consider as part of the review process for freshman and transfer admissions. BOARS suggests 14 factors for consideration of freshman applicants, including six non-academic and eight academic factors, as shown in the table to the right. For transfer applicants, the BOARS guidance recommends consideration of nine factors that consist of four non-academic and five academic factors, three of which involve transfer-specific admissions requirements. See Appendix 1 for further detail on each of the comprehensive review factors that campuses consider for freshman and transfer applicants.

**Comprehensive Review Factors for Freshman Applicants**

<b>Academic Factors</b>	<b>Non-academic Factors</b>
Grade point average	Special project achievements in any academic field
Test scores	Improvement in academic performance
Performance in and number of courses beyond minimum A-G requirements*	Special talents, achievements, and awards
UC-approved honors courses and advanced courses	Completion of special high school projects
Eligibility in the Local Context (CA residents only)	Academic accomplishment in light of life experiences
Quality of senior year program of study	Geographic location
Academic opportunities in California high schools	
Outstanding performance in one or more academic subject areas	

\*A-G requirements consist of high school courses that students must complete with a letter grade of C or better to be eligible for admission.

The specific implementation of the comprehensive review process varies by campus. The methods that UC campuses use have evolved over time, from fixed-weight on some factors like a combination of grade point average (GPA) and test scores, to some combination of an index or fixed weight and a separate review of non-academic factors, to no fixed weight on any criteria (holistic method). Currently, most campuses use the holistic method to evaluate applications for admission. As part of comprehensive review, most campuses conduct multiple reviews of each application, which may include automated application evaluation to assess quantitative elements, such as GPA and test scores.

### *Eligibility in the Local Context*

Eligibility in the Local Context (ELC) is one of the factors that campuses consider as part of comprehensive review. ELC is a factor comprised of California high school students' ranks within their high school classes. Specifically, the University identifies the top nine percent of students at each high school based on GPA in UC-approved coursework. If those students also have a GPA of at least 3.0 and have completed certain courses, the University designates them as ELC and the campuses to which they have applied consider this factor along with other comprehensive review factors. Campuses that ELC applicants select may not be able to offer them admission, and so other campuses that have space will offer them admission instead.

### *Admissions by Exception*

Regents Policy 2105 (Policy on Undergraduate Admissions by Exception) and Academic Senate regulations allow a campus to admit a small number of applicants who may not meet all minimum admission requirements, but demonstrate high potential for academic success and leadership and are otherwise competitive for admission. Campuses use admission by exception most frequently for students with non-traditional educational backgrounds, such as homeschooled students, students from rural areas or extraordinarily disadvantaged circumstances, or students with special talents, including athletic ability, who have demonstrated potential to succeed academically at the University. A campus may enroll up to six percent of its incoming freshman class under the admission by exception policy, up to four percent of which may be disadvantaged students, but in practice, according to Systemwide Undergraduate Admissions, the University has granted admission by exception to less than two percent of all new enrollees over the last several years. Applicants that campuses consider for admission by exception undergo an additional qualitative review beyond the comprehensive review used to determine initial admissibility.

### *Application Verification Process*

As noted earlier in this report, each campus verifies the grades and standardized test scores of applicants who accept offers of admission. This process occurs throughout the application cycle and continues through the summer and into fall.

Separately, in conjunction with the adoption of the University's comprehensive review policy for admissions, in 2002 Systemwide Undergraduate Admissions began verifying the academic and non-academic achievements of a limited sample of applicants through the use of a third-party vendor. Multiple parts of the admission application are subject to random verification: non A-G coursework (freshman only), honors and awards, extracurricular activities, volunteer work and community service, special program participation, employment, and information contained in the

personal insight question responses. The University provides notice in the application that information may be verified, including in the affidavit and electronic signature required for submission.

Systemwide Undergraduate Admissions conducts its application verification process after applications are submitted, but before admissions decisions are made. According to Systemwide Undergraduate Admissions, the number of applicants that it selects for verification is statistically significant and therefore provides a reasonable foundation for ensuring that those who have falsely reported application information can be detected.

The University denies or revokes admission to all UC campuses for students that it identifies as having falsified their application information, regardless of whether that information was used in an admission decision at a particular campus. According to Systemwide Undergraduate Admissions, as a result of its requests to verify achievements, the University typically cancels nearly 100 applications per year due to nonresponse, versus fewer than half a dozen per year due to admitted falsification.

#### *Special Talent Admissions (“Special Admissions”)*

Campus athletics and certain academic units, such as specialty schools, provide admissions or other designated offices with recommendations for applicants that they have identified as having athletic qualifications or other special talents, respectively. Similarly, other individuals affiliated with a campus, such as a band leader or debate coach, could also recommend an applicant whose ability they believe would be beneficial to their program or team. For the purposes of this report, we will define this category of admissions as “special admissions.” Campus admissions offices factor these special talents into their overall assessments of applicants under comprehensive review. In addition, campus admissions offices may consider applicants who have special talent recommendations for admission by exception, which is discussed above.

## Opportunities for Improvement and Recommendations

### 1. Documentation Supporting the Admissions Process

Campuses could promote policy adherence and process consistency as well as reduce the risk of fraud in the admissions process through improvements in admissions process documentation. Specifically, these improvements consist of developing documentation of all local admissions policies and procedures and documenting sufficient supporting details for admissions decisions and recommendations.

Sufficient documentation of local admissions policies and procedures is necessary to establish clear guidance, maintain consistency in the admissions process, and reduce the risk of fraud. A few campuses lack such documentation altogether, and although the majority of campuses have documented certain admissions-related policies and procedures, they may not be of sufficient breadth and depth to promote both systemwide and local policy objectives and mitigate process irregularities.

All campuses record the actual admissions decisions that result from their review of applications, but vary in terms of the supporting details that they document. For example, a campus may not document who evaluated an application or made the final admissions decision. In addition, most campuses do not document the bases for admissions decisions that were influenced by qualitative factors, such as academic accomplishment in light of life experiences. However, at a minimum, each campus should clearly document the criteria it considers in application evaluations and ensure that the documentation supporting its evaluations demonstrates implementation of these criteria. Maintaining adequate documentation of application evaluations consistent with comprehensive review requirements helps to reduce the risk of fraud and serves as a basis to demonstrate adherence to policy requirements.

As noted earlier in this report, BOARS guidance for comprehensive review recommends consideration of fewer factors for transfer than freshman applicants. Specifically, BOARS guidance for transfer applicants recommends consideration of nine factors that consist of four non-academic and five academic factors, three of which involve transfer admission requirements, such as general education and major prerequisite courses. Because of the precise and quantifiable nature of these transfer-specific academic factors, transfer applicants generally pose a lower risk of fraud in the admissions process.

#### *Recommendations*

Campuses should:

- 1.1 Document any local policies and develop detailed procedures for all aspects of the application evaluation and admissions process, to include the following:
  - Criteria used to evaluate applications, including any qualitative factors considered, consistent with comprehensive review
  - Minimum documentation requirements to demonstrate application of criteria in the evaluation results

- For freshman application evaluations that consider qualitative factors, a requirement that at least two independent documented evaluations support a decision to admit

1.2 Document all admissions decisions with sufficient detail to:

- Meet the minimum documentation requirements specified in the policies and procedures described in recommendation 1.1
- Indicate the specific individuals and/or committees that were involved in the evaluation of the application and the final decision

## **2. Verifying Application Information**

As discussed earlier in this report, Systemwide Undergraduate Admissions performs an annual verification of academic and non-academic achievements of a limited sample of applicants through the use of a third-party vendor. Systemwide Undergraduate Admissions could reduce the risk of fraudulent admissions resulting from undetected false application information by strengthening this process. Increasing the likelihood of detecting false information would maintain the integrity of the University's practice of considering a variety of factors in admissions under its comprehensive review policy.

Although the campuses ultimately verify the academic qualifications of all admitted students, we observed that none of the campuses verify non-academic application information at any time because they rely on the verification process facilitated by Systemwide Undergraduate Admissions. Under this process, prior to the campuses making admissions decisions, Systemwide Undergraduate Admissions selects what they have determined to be a "statistically significant" number of applications for verification of an application item. These can include items such as non A-G coursework, honors and awards, extracurricular activities, volunteer work and community service, special program participation, employment, self-reported academic record, and information contained in personal insight question responses. However, we noted that Systemwide Undergraduate Admissions determined the statistical significance of the sample a number of years ago, when the size of the application population was significantly smaller, and did not document this analysis.

During our review of the verification process, we found weaknesses that suggest that the implementation of the process is not as robust as the previously determined statistical significance of its sample size may suggest. Undergraduate Admissions selects only one item per application for verification rather than multiple items when present. Further, across the overall population of applications, Systemwide Undergraduate Admissions selects the same number of sample items (one) for each application section regardless of the relative risk of falsification.

We also found that it would be difficult for Systemwide Undergraduate Admissions to determine the actual rate of falsified application information that it may be detecting through the annual verification process for two reasons: First, a significant number of students do not respond to the University's request to verify application information. Second, an applicant may be permanently excused from the verification process if they provide an acceptable explanation for their inability to obtain documentation for an item. The number of permanent excusals granted for 2017, 2018 and 2019 was two, three and 18, respectively, out of 1,000 applications reviewed. Systemwide

Undergraduate Admissions does not formally document its approval of permanent excusals or their rationale.

Finally, we observed that the efficacy of Systemwide Undergraduate Admissions' annual application verification process is inherently limited by an assumption that the requested information provided by applicants is authentic. We noted that the university has limited ability to address this risk through internal controls.

### *Recommendations*

Systemwide Undergraduate Admissions should:

- 2.1 Document the methodology used to determine the sample size for the annual verification process and annually reassess the sample size based on the current size of the applicant population.
- 2.2 Perform a risk analysis to determine the relative risk of falsification for each application section and, where present, increase the number of sample items that it selects from each application section according to the risk of falsification as determined by this analysis. As part of this analysis, consider the rate of nonresponse for each category in addition to the rate of identified falsification.
- 2.3 Develop formal requirements that it must follow for granting and approving permanent excusals from the verification process, including:
  - Required follow-up steps when an applicant reports that they are unable to provide supporting documentation for an item being verified, including a requirement to seek alternate documentation such as personal statements from third parties
  - A requirement to document its analysis and rationale for granting a permanent excusal
  - Approval requirements for permanent excusals

### **3. Special Talent Admissions (“Special Admissions”)**

As part of the comprehensive review process, campus admissions offices consider recommendations from campus units or individuals that are based on special talent, such as in athletics or the arts, which we have defined as “special admissions.” These recommendations may come in the form of lists of prospective student athletes or summary scores of talent-based portfolios that are reviewed by a department. In our walkthroughs, we observed that the documentation supporting these recommendations is not always sufficient to ensure that the special talent is verified and legitimate.

In order to mitigate the risk of undue influence or fraud associated with these “special admissions,” this category of applicants requires a higher level of control. There are opportunities for campuses to implement additional protocols to ensure that the recommendations are authentic and adequately supported. To help ensure the legitimacy of the

special talent qualifications that are considered in admissions decisions and reduce the risk of fraudulent recommendations, departments should institute stronger controls for the verification and approval of recommendations before forwarding them to the admissions office.

For a variety of reasons, we observed that the risk of fraudulent admissions for prospective student athletes is significantly lower for those who are offered athletic scholarships. NCAA regulations include requirements for scholarship athletes that make it difficult for coaches to place those who are unqualified on a team roster, including restrictions on the amount of scholarship aid that can be granted, limits by sport on the number of student athletes to whom universities may award scholarships, and the four-year guaranteed scholarship provision, under which a student athlete's scholarship is removed if they do not remain on the team for a full four years. Coaches are under significant pressure to achieve competitive success, and there are numerous financial and reputational motivating factors that incentivize them to reserve the limited number of scholarships under their control for only the most talented players. Additionally, players on athletic teams are typically aware of which members are on scholarships and would likely raise questions regarding those with clear deficiencies in talent. For these reasons, several of this report's recommendations are limited to non-scholarship student athletes.

### *Recommendations*

Systemwide Undergraduate Admissions should:

- 3.1 Develop and issue guidance to clarify the definition of special talent to ensure that campuses consistently identify and track the population of applicants that departments recommend on the basis of special talent.

Campuses should:

- 3.2 Clearly identify and track all applicants that departments recommend on the basis of special talent.
- 3.3 Establish and document the minimum requirements for documented verification of special talent for each department. These minimum requirements should identify the types of information and trusted sources that can be used to confirm qualifications or credentials for a specific sport or talent. Requirements for documented verification of athletic qualifications could be limited to non-scholarship prospective student athletes.
- 3.4 Require a two-step verification process for any recommendation for admission on the basis of special talent that includes the following:
  - The initiator of the recommendation must document and attest, under penalty of disciplinary action, that they have performed an assessment and determined that the level of special talent warrants a recommendation for admission
  - An individual in a supervisory capacity must approve the recommendation
 For athletics, this process could be limited to non-scholarship prospective student athletes.

3.5 For all non-scholarship prospective student athletes recommended for admission by athletics, require that the athletics compliance office verify the qualifications of the recommended applicant, in accordance with the requirements referenced in recommendation 3.3.

3.6 Require all admissions decisions for applicants recommended by departments on the basis of special talent to be approved by the admissions director or a member of senior leadership external to the recommending department.

#### **4. Admissions by Exception**

As discussed earlier in this report, admissions by exception is the policy under which a campus may admit an applicant who does not meet the minimum UC requirements for admission, but who demonstrates high potential for academic success and leadership. In our walkthroughs, we observed that only a few campuses have established local documented policies and procedures for admissions by exception to supplement Regental policy.

In July 1996, the Regents issued Policy 2105: Policy on Undergraduate Admissions by Exception. This Regental policy describes the general purpose of admissions by exception but does not include specific characteristics to consider. In 2005, the Board of Admissions and Relations with Schools (BOARS) prepared a guidance document entitled “Guidelines for Implementation of University Policy on Admission by Exception” that outlines five principles for admissions by exception and six recommended categories of applicants to consider for admissions by exception.

Some campuses have developed local policies and procedures modeled after the BOARS guidance document to further detail aspects of the Regental policy, such as any campus-specific minimum qualifications, and define their local evaluation processes. Since the purpose of admissions by exception is to allow for some flexibility at the campus level, campus policies and procedures for admissions by exception that are consistent with Regents policy can serve as a valuable resource to assist campuses in identifying potential admissions by exception applicants and help ensure consistency in the policy’s application.

We further observed that not all campuses explicitly document the exceptional characteristics that caused an applicant to be considered for admissions by exception. A reader or evaluator typically identifies or flags an application or student record in the admissions system, which could take the form of selecting admissions by exception as a reason from a drop-down menu or applying a special admit code. These methods would be appropriate if the available options specifically identified the exceptional characteristic, as opposed to just identifying the applicant as an admission by exception candidate. Further, we observed that admissions by exception candidates are not always independently reviewed and approved by someone other than the individuals who initially selected the applicants to be considered for admissions by exception. A secondary review and approval would help to ensure that proposed admissions by exception are reasonable and appropriate according to local policies and procedures.

On average, the rates of admissions by exception are low. According to Systemwide Undergraduate Admissions, for fall 2018, the systemwide admissions by exception rates for



freshman and transfer admissions were 1.9% and 1.7%, respectively. However, during this period, one campus exceeded the 6% admissions by exception enrollment limit for freshman admissions and transfer admissions. Another campus also exceeded the 6% admission by exception limit for transfers, but due to the small size of the transfer class, the difference was only one student. During our analysis of admissions by exception rates by campus, we observed indications that campuses were capturing the number of admissions by exception inconsistently, suggesting the need for systemwide guidance on measuring admissions by exception.

### *Recommendations*

Systemwide Undergraduate Admissions should:

- 4.1 Develop and issue guidance for measuring admissions by exception rates to ensure that campuses are measuring them consistently.

Campuses should:

- 4.2 Establish a local campus policy that outlines acceptable rationale and the required evaluation process for admissions by exception. At a minimum, this policy should ensure that an individual who identifies a candidate for admission by exception cannot make the final admission decision.
- 4.3 Establish controls to ensure that an acceptable rationale for identifying an applicant to be considered for admission by exception is documented for each applicant being considered under the policy.
- 4.4 Establish local procedures to annually monitor compliance with the campus percentage limits for admissions by exception established by Regental policy.

## **5. Conflict of Interest in Admissions Review**

Overall, campuses have not systematically reviewed and developed measures to control conflict of interest in the admissions process. Campuses could reduce the resulting risk of fraudulent admissions by further developing and documenting local policies and procedures, providing related training to affected personnel, and implementing controls over external readers and outreach staff.

Notably, most campuses lack sufficient documented conflict of interest policies and procedures that cover all individuals who participate in or influence the review of applications for admission, although they generally have some provision for addressing conflict of interest for application readers. At most campuses, these readers consist of both career admissions employees and temporary staff (external readers) due to their significantly increased workload during the admissions season. External readers are at a higher risk than career employees for potential conflicts of interest, due both to the temporary nature of their University employment as well as their current or past regular employment. For example, external readers may be employed as local high school teachers or counselors, and may wish for students from their schools to be admitted. In addition, at most campuses readers include outreach staff and

admissions staff who perform outreach activities as one of their duties. These individuals are also at a high risk for conflicts of interest because the nature of their work can result in their becoming prejudiced in favor of applicants with whom they have had more than routine contact.

A few campuses have included conflict of interest procedures in their reader training manuals, such as instructing readers not to review known applicants, and a few other campuses require readers to sign statements that they will recuse or have recused themselves from reviewing all applications submitted by applicants with whom they are acquainted. In addition, one campus has a policy that precludes readers from reviewing known applicants, and another randomly assigns applications to readers. However, none of the campuses has a comprehensive set of policies and procedures that cover all individuals involved in the process, such as other admissions and outreach staff who may exercise discretion over admissions decisions, including admissions management, and other individuals outside of admissions who can also influence decisions, such as faculty and athletics staff.

### *Recommendations*

Campuses should:

- 5.1 Establish documented conflict of interest policies and procedures that cover all individuals who are involved in reviewing admissions applications or making admissions decisions, including external readers. At a minimum, these policies and procedures should require that such individuals annually:
  - Disclose the nature of their acquaintance with known applicants, their families or any other potential conflict of interest and attest, under penalty of disciplinary action, that they have recused themselves from reviewing applications associated with these potential conflicts
  - Attest that they are not aware of any attempt to improperly influence an admissions decision.
- 5.2 Provide regular training to all individuals who are involved in reviewing admissions applications or making admissions decisions, including external readers, regarding conflicts of interest and associated requirements. This training should include, but not be limited to, the definition of improper influence and provide examples of improper influence in the context of admissions.
- 5.3 Establish controls requiring external readers to disclose any current affiliations with high schools or community colleges and preventing those who have such affiliations from being assigned an application of a student from that high school or community college for review.
- 5.4 Establish controls preventing individuals who perform outreach from reviewing applications from individuals with whom they have had more than routine contact.

## 6. Admissions IT System Access

The campus admissions offices throughout the system use a variety of IT systems as part of the admissions process, and grant varying levels of system access to both admissions and IT personnel depending on job responsibility. For example, certain individuals have the ability to change admissions decisions in the system. To ensure that only authorized individuals have access to admissions-related IT systems and their levels of access are appropriate, and to reduce the risk of fraudulent or unauthorized activity, it is important that campuses implement controls to monitor access rights to all admissions IT systems and ensure that those rights align with job responsibilities. It is of equal importance to ensure that controls are in place to review and approve changes to access rights and monitor changes to applicant information.

In our walkthroughs, we observed that several campuses did not specifically identify the appropriate system access role associated with staff position titles and functions. We further observed that one campus did not promptly remove access to the admissions system for certain users who no longer required access. Periodic checks of the IT system access rights of all users are essential to ensure that only authorized individuals have IT system access and that their levels of access are appropriate. Further, campuses should review and approve any requests for access changes. Accordingly, campuses would benefit from documenting access provisioning and review processes to ensure that access is only provided to authorized individuals and is consistent with their roles and responsibilities.

Although all campuses log or have the capability to log user activity, we identified a number of campuses that do not monitor user activity on admissions-related IT systems. The lack of a monitoring process for IT system changes or overrides, such as editing admissions decisions, may allow inappropriate or unauthorized admissions decisions to go undetected.

### *Recommendations*

Campuses should:

- 6.1 Implement controls to periodically review admissions IT system access to ensure that the level of access is aligned with job responsibilities including, at a minimum, a review of user access before each annual admissions cycle begins.
- 6.2 Implement controls to log activity in admissions IT systems and periodically review high-risk changes, such as admissions decision changes, for appropriateness. Campuses should define high-risk changes to review and monitor.

## 7. Athletics Department Recommendation Limits

At some campuses, the athletics department is limited to a specific number or range of “slots” for recommendations for admission in a given year. The purpose of these limits is to establish a maximum number of prospective student athletes that can be “tagged” by the athletics department as recommendations for admission. Typically, these limits are negotiated between athletics and campus admissions. Most campuses indicated that there is some level of periodic monitoring of the limit, typically by admissions or an oversight committee. However, this

monitoring is typically informal and does not occur based on an established frequency. At some locations, the limit has remained unchanged for several years. If these limits are not independently reviewed on a regular basis according to established criteria, there is a risk that athletics may “tag” more student athletes than needed to fill team rosters, creating a potential opportunity to use these extra spaces for fraudulent admissions.

### *Recommendation*

Campuses should:

- 7.1 If the campus maintains a limit for athletics admissions slots, implement a process for a department independent of athletics to perform a regular documented review of the limit for appropriateness, based on established criteria, to ensure that athletics is not allocated an excessive number of slots, and adjust the limit as necessary. This review should be performed at least every two years and should assess the limit for each sports program if separate limits are established for each program.

## **8. Conflict of Interest in Athletics**

We observed that most campuses do not have formal protocols in place to identify and review personal relationships between athletics personnel and prospective student athletes or their families, nor established mechanisms to identify and report suspicious contact from third parties regarding prospective student athletes. Without protocols to control potential conflicts of interest, there is a risk that relationships could be exploited to gain fraudulent admission to the university. In our walkthroughs, we observed that some campuses have established certain protocols within their athletics departments to address risks associated with conflicts of interest, such as a standing practice to ask questions of recruits related to potential conflicts of interest. However, most campuses do not have comprehensive policies in place to identify and manage potential conflicts of interest in athletics.

### *Recommendations*

Campuses should:

- 8.1 Establish a policy addressing conflict of interest requirements for athletics personnel including, at a minimum, a requirement to formally disclose and review any known existing relationship between a member of the athletics staff and a prospective student athlete or their family to determine if a potential conflict of interest exists and whether it should be addressed with a management plan.
- 8.2 Perform an analysis to identify categories of third parties who contact the athletics department regarding prospective student athletes that are unusual or at a higher risk of inappropriately influencing admissions decisions, such as donors, admissions consultants, and athletic recruiting/scouting services not approved by the NCAA. Establish a requirement for all athletics personnel to document all contact from these categories in a

central repository. Athletics compliance should at least annually review this list and investigate any questionable contact.

- 8.3 Provide regular training to athletics personnel on the conflict of interest requirements discussed in recommendations 8.1 and 8.2.

## **9. Monitoring Student Athletes' Participation in Athletic Programs**

To mitigate the risk of fraudulent admissions based on falsified athletic profiles or bribery of athletics officials, campuses have opportunities to implement additional protocols to ensure that student athletes participate in the athletic programs for which they were recruited. These protocols would help to ensure the legitimacy of the athletic qualifications that are considered in admissions decisions.

In our walkthroughs, we observed that only two campuses have established requirements for a minimum period of participation in athletics programs for student athletes. Both of these campuses have established a one-year minimum participation requirement, with certain exceptions, such as injuries. Further, while some campuses have implemented protocols to monitor participation, such as periodic reviews of active rosters, these protocols could be strengthened to ensure that each student's ongoing participation in an athletic program is actively monitored. There is a risk that rosters or other documentation supporting student athletes' participation could be manipulated by coaches or other personnel. If there are poor controls over the integrity of active rosters, the quality of monitoring protocols based on this information will be compromised.

It is important for each campus to ensure that effective controls are in place to record ongoing active participation in athletic programs and monitor each recruited student athlete's participation status to identify cases of possible fraudulent admission.

### *Recommendations*

Campuses should:

- 9.1 Establish a policy requiring a minimum of one year of participation in an athletic program for non-scholarship student athletes recommended for admission by the athletics department. This policy should include:
- Any exceptions to this requirement
  - Approval requirements for any exceptions to the policy
  - Consequences for violating the policy
- 9.2 As a condition of admission, require non-scholarship athletes recommended for admission to sign an agreement that they will comply with the minimum participation requirement, subject to the consequences established in the policy.
- 9.3 Establish controls to ensure records supporting ongoing participation in athletics are kept current throughout the season.

9.4 Establish controls to independently monitor compliance with the one-year minimum participation requirement for non-scholarship student athletes recommended for admission.

9.5 Provide regular training to athletics staff on the minimum participation policy requirements.

## **10. Independence of Athletics Compliance**

As part of the UC compliance structure, each campus has established a chief ethics and compliance officer (CECO). The role of the CECO is to provide facilitation and leadership to the campus community on compliance risks and, where appropriate, advice and counsel to the Chancellor and senior management, including reporting of potential or perceived compliance and ethics issues. Notably, the CECO also directly reports to the Systemwide Chief Compliance and Audit Officer, which provides a means to independently report matters of concern to the Board of Regents. The CECO, along with the campus ethics, compliance and audit committees, provide the structure and guidance to implement an effective systemwide compliance program.

The athletics compliance office at each campus provides oversight and guidance to ensure adherence to all regulations created for the governance of intercollegiate athletics. Campus athletics compliance officers report to their respective athletics directors. The campus athletics compliance departments also provide student athletes, coaches, and staff with the knowledge needed to be successful within the guidelines provided by NCAA rules, and help maintain integrity in the area of athletics compliance.

In our walkthroughs, we observed that at most campuses the athletics compliance officer oversees important monitoring activities that could identify inappropriate or fraudulent activity, but does not have a reporting relationship independent of the athletics director, making them vulnerable to undue influence. This current reporting structure may inhibit athletics compliance from reporting issues to campus, and ultimately, systemwide leadership. Given that the UC Ethics and Compliance Program infrastructure is intended to include a broad cross-section of stakeholders from all University locations and specific risk areas, the addition of athletics compliance reporting to the CECO would be appropriate. We view a reporting structure that includes the CECO as a leading practice that all campuses should adopt.

### *Recommendation*

Campuses should:

- 10.1 Restructure the reporting relationship of the campus athletics compliance officer to add a direct reporting line to the campus chief ethics and compliance officer.

## 11. Monitoring of Donations and Admissions

Regental policy articulates the university's position regarding the consideration of financial benefit to the university in admissions decisions. Specifically, Regents Policy 2202, Policy Barring Development Considerations from Influencing Admissions Decisions, states, "admissions motivated by concern for financial, political or other such benefit to the University do not have a place in the admissions process." We observed that there is an opportunity to strengthen the language in this policy to more explicitly prohibit development and legacy considerations from influencing admissions decisions.

In our discussions with admissions personnel for this audit, each campus confirmed that, as a matter of practice, they do not consider donations to the campus or whether applicants are related to alumni (legacy admissions) when making admissions decisions.

To provide additional assurance that admissions decisions are not motivated by concern for financial benefit to the University, campuses should implement protocols to limit communication between development and admissions. Further, they should implement processes to periodically review large donations to the campus to identify potential admissions decisions that these donations could have influenced. We observed that two campuses have implemented protocols to review donations as part of athletics admissions review. However, non-athletics admissions also face the risk of being influenced by donations to the campus.

### *Recommendations*

Campuses should:

- 11.1 Establish a policy limiting communication between development personnel and the admissions office regarding admissions matters. At a minimum, any communication regarding the admission status of specific applicants should be prohibited.
- 11.2 Perform a review prior to admission for each non-scholarship recruited athlete to identify any donations from any known relatives of the recruited athlete, or anyone that the athletics department knows to be acting on behalf of the family. A member of senior leadership independent of the athletics department or an existing athletics admissions oversight committee should oversee this review process, including determination of any due diligence required when donations are identified, and approval of any admissions decisions for which donations were identified.

Internal Audit should:

- 11.3 Periodically perform a retrospective review of donations to the campus to identify admissions decisions that could have been influenced by these donations. Any questionable admissions decisions identified through this process should be referred to the Locally Designated Official for investigation.

## Appendix 1: Comprehensive Review Factors

The following descriptions provide further detail regarding the University of California's comprehensive review factors for freshman and transfer applicants.

### *For Freshman Applicants*

1. Academic grade point average in all completed "a-g" courses, including additional points for completed UC-certified honors courses.
2. Scores on the ACT With Writing or SAT Reasoning Test.
3. Number and content of, and performance in, academic courses beyond the minimum "a-g" requirements.
4. Number of and performance in UC-approved honors and advanced placement courses.
5. Identification by UC as being ranked in the top 9 percent of their high school class (eligibility in the local context, or ELC).
6. Quality of a student's senior-year program, as measured by the type and number of academic courses in progress or planned.
7. Quality of their academic performance relative to the educational opportunities available in their high school.
8. Outstanding performance in one or more academic subject areas.
9. Outstanding work in one or more special projects in any academic field of study.
10. Recent, marked improvement in academic performance, as demonstrated by academic GPA and the quality of coursework completed or in progress.
11. Special talents, achievements and awards in a particular field, such as visual and performing arts, communication or athletic endeavors; special skills, such as demonstrated written and oral proficiency in other languages; special interests, such as intensive study and exploration of other cultures; experiences that demonstrate unusual promise for leadership, such as significant community service or significant participation in student government; or other significant experiences or achievements that demonstrate the student's promise for contributing to the intellectual vitality of a campus.
12. Completion of special projects undertaken in the context of a student's high school curriculum or in conjunction with special school events, projects or programs.
13. Academic accomplishments in light of a student's life experiences and special circumstances.
14. Location of a student's secondary school and residence.



*For Transfer Applicants*

1. Completion of a specified pattern or number of courses that meet breadth or general education requirements.
2. Completion of a specified pattern or number of courses that provide continuity with upper division courses in the student's major, such as a UC Transfer Pathway, AA degree for transfer (offered at a CA community colleges only), or UC campus-specific major prerequisites.
3. Grade point average in all transferable courses-especially in a UC Transfer Pathway or in major prerequisites.
4. Participation in academically selective honors courses or programs.
5. Special talents, achievements and awards in a particular field, such as visual and performing arts, communication or athletic endeavors; special skills, such as demonstrated written and oral proficiency in other languages; special interests, such as intensive study and exploration of other cultures; experiences that demonstrate unusual promise for leadership, such as significant community service or significant participation in student government; or other significant experiences or achievements that demonstrate the student's promise for contributing to the intellectual vitality of a campus.
6. Completion of special projects undertaken in the context of the college curriculum or in conjunction with special school events, projects or programs.
7. Academic accomplishments in light of the student's life experiences and special circumstances.
8. Location of the student's college and residence.
9. Completion of a UC Transfer Pathway or an AA degree for transfer offered by a California community college.

## Appendix 2: A-G Subject Requirements

Completion of the a-g subject requirements is one of the minimum academic standards that a student must attain to be considered for freshman admission at UC. To satisfy these requirements, applicants must complete a minimum of the following 15 college-preparatory courses with a letter grade of C or better:

- |                                |          |
|--------------------------------|----------|
| a. History                     | 2 years  |
| b. English                     | 4 years  |
| c. Mathematics                 | 3 years  |
| d. Laboratory science          | 2 years  |
| e. Language other than English | 2 years* |

\*or equivalent to the 2nd level of high school instruction

- |                                 |        |
|---------------------------------|--------|
| f. Visual and performing arts   | 1 year |
| g. College-preparatory elective | 1 year |

(chosen from the subjects listed above or another course approved by the university)

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<b>Recommendation</b>	<b>Management Corrective Action</b>	<b>Target Date</b>
<p>1.1 Document any local policies and develop detailed procedures for all aspects of the application evaluation and admissions process, to include the following:</p> <ul style="list-style-type: none"> <li>• Criteria used to evaluate applications, including any qualitative factors considered, consistent with comprehensive review</li> <li>• Minimum documentation requirements to demonstrate application of criteria in the evaluation results</li> <li>• For freshman applications, a requirement that at least two independent documented evaluations support any decision to admit</li> </ul>	<p>Various local policies and procedures already exist. Admissions will engage the local Academic Senate Committee on Admissions to further document policy aspects of the application evaluation and admission process. Procedures pertaining to aspects of the application evaluation and admissions process that have not already been documented will also be documented.</p>	<p>December 1, 2019</p>
<p>1.2 Document all admissions decisions with sufficient detail to:</p> <ul style="list-style-type: none"> <li>• Meet the minimum documentation requirements specified in the policies and procedures described in recommendation 1.1</li> <li>• Indicate the specific individuals and/or committees that were involved in the evaluation of the application and the final decision</li> </ul>	<p>Admissions Management will review documentation with regard to Admission processes to ensure Admission decisions are adequately documented with sufficient details per policy.</p> <p>Admissions will create a document that indicates the titles of individual staff involved in the selection process (to include those who are evaluating and making the final decision).</p>	<p>December 1, 2019</p>
<p>3.2 Clearly identify and track all applicants that departments recommend on the basis of special talent.</p>	<p>Admissions Management indicated that at UC San Diego, some departments (e.g., Arts and Athletics) assess talent. They do not make recommendations for admission.</p> <p>Admissions and Athletics already have processes to identify and track all applicants that are assessed for talent. The processes and documentation will be reviewed to identify opportunities for improvement.</p>	<p>January 31, 2020</p>

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<b>Recommendation</b>	<b>Management Corrective Action</b>	<b>Target Date</b>
<p>3.3 Establish and document the minimum requirements for documented verification of special talent for each department. These minimum requirements should identify the types of information and trusted sources that can be used to confirm qualifications or credentials for a specific sport or talent. Requirements for documented verification of athletic qualifications could be limited to non-scholarship prospective student athletes.</p>	<p>Athletics will establish and document minimum requirements for documented verification of special talent of athletes specific to non-scholarship student-athletes.</p> <p>Admissions will work with the Division of Arts and Humanities on maintaining documented verification of talent.</p>	January 31, 2020
<p>3.4 Require a two-step verification process for any recommendation for admission on the basis of special talent that includes the following:</p> <ul style="list-style-type: none"> <li>• The initiator of the recommendation must document and attest, under penalty of disciplinary action, that they have performed an assessment and determined that the level of special talent warrants a recommendation for admission</li> <li>• An individual in a supervisory capacity must approve the recommendation</li> </ul> <p>For athletics, this process could be limited to non-scholarship prospective student athletes.</p>	<p>Athletics will establish and document their process for submitting an individual that they have assessed for talent on the Prospective Student Athlete list (PSA) with a focus on updating process with Admissions on how PSA list to be submitted. This process will include two-step verification.</p> <p>Admissions will work with the Division of Arts and Humanities to document the process for the assessment of talent via the Arts Portfolio and will inform the Division of the two-step verification recommendation.</p>	January 31, 2020
<p>3.5 For all non-scholarship prospective student athletes recommended for admission by athletics, require that the athletics compliance office verify the qualifications of the recommended applicant, in accordance with the requirements referenced in recommendation 3.3.</p>	<p>Athletics Management will ensure policy requirements established in recommendation 3.3 will be independently verified for submission by the Athletics Compliance Office.</p>	January 31, 2020

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<b>Recommendation</b>	<b>Management Corrective Action</b>	<b>Target Date</b>
3.6 Require all admissions decisions for applicants recommended by departments on the basis of special talent to be approved by the admissions director or a member of senior leadership external to the recommending department.	Admissions Management in consultation with the Associate Vice Chancellor (AVC) for Enrollment Management will develop an operational plan for senior leadership in Admissions to approve PSAs or Arts Portfolio submitters.	December 1, 2019
4.2 Establish a local campus policy that outlines acceptable rationale and the required evaluation process for admissions by exception. At a minimum, this policy should ensure that an individual who identifies a candidate for admission by exception cannot make the final admission decision.	The Office of Admissions abides by Regents Policy 2105, Admission by Exception. Admissions will document the local operational function for abiding by the systemwide policy including acceptable rationale, the evaluation and decision making process.	December 1, 2019
4.3 Establish controls to ensure that an acceptable rationale for identifying an applicant to be considered for admission by exception is documented for each applicant being considered under the policy.	The Office of Admissions abides by Regents Policy 2105, Admission by Exception. Admissions will document the local operational function for abiding by the systemwide policy. Admissions will continue to ensure applicants admitted exception are coded as such in the Student Information System (SIS). Also, Admissions will explore how to best document and implement controls including specific rationale for an applicant admitted by exception and all applicants identified for consideration under admissions by exception	January 31, 2020
4.4 Establish local procedures to annually monitor compliance with the campus percentage limits for admissions by exception established by Regental policy.	Admissions Management already has local procedures to annually monitor compliance with the campus percentage limits for admissions by exception established by Regental policy. Admissions is updating documentation on procedures for the annual process.	January 31, 2020

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<b>Recommendation</b>	<b>Management Corrective Action</b>	<b>Target Date</b>
<p>5.1 Establish documented conflict of interest policies and procedures that cover all individuals who are involved in reviewing admissions applications or making admissions decisions, including external readers. At a minimum, these policies and procedures should require that such individuals annually:</p> <ul style="list-style-type: none"> <li>• Disclose the nature of their acquaintance with known applicants, their families or any other potential conflict of interest and attest, under penalty of disciplinary action, that they have recused themselves from reviewing applications associated with these potential conflicts</li> <li>• Attest that they are not aware of any attempt to improperly influence an admissions decision.</li> </ul>	<p>Admissions Management already has certain conflict of interest policies and procedures. Admissions Management will review and enhance documentation to make this a part of the annual contract for external readers. For internal staff who have a job task of reviewing applications, Admissions Management will develop a document that is reviewed and signed during the onboarding process for new hires. Existing staff would review and sign the document once it is developed.</p>	<p>December 1, 2019</p>
<p>5.2 Provide regular training to all individuals who are involved in reviewing admissions applications or making admissions decisions, including external readers, regarding conflicts of interest and associated requirements. This training should include, but not be limited to, the definition of improper influence and provide examples of improper influence in the context of admissions.</p>	<p>Admissions Management currently provides annual training for all readers, this topic is covered in the current training documents. In the future, Admissions Management will enhance the training to include definitions and examples of improper influence in the context of admissions.</p>	<p>December 1, 2019</p>

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<b>Recommendation</b>	<b>Management Corrective Action</b>	<b>Target Date</b>
<p>5.3 Establish controls requiring external readers to disclose any current affiliations with high schools or community colleges and preventing those who have such affiliations from being assigned an application of a student from that high school or community college for review.</p>	<p>Admissions Management will enhance the current processes regarding external readers by:</p> <ul style="list-style-type: none"> <li>• Adding questions to the External Reader application that asks about specific affiliations to schools and outreach programs.</li> <li>• Adding specific disclosure of affiliations to conflict of interest document that is completed and signed by those hired as external readers.</li> <li>• Adding measures to prevent readers from being assigned applications of a student from affiliated high school or community college to review.</li> <li>• Continuing to review topic during training as stated in 5.2.</li> </ul>	<p>December 1, 2019</p>
<p>5.4 Establish controls preventing individuals who perform outreach from reviewing applications from individuals with whom they have had more than routine contact.</p>	<p>Full-time Admissions Officers in the Office of Admissions do outreach and application review using a territory management model. Per the policy established by the Academic Senate Committee on Admissions, every application receives a minimum of two reviews by independent parties, which may include one review by the Admissions Officer assigned to their territory.</p> <p>Admissions will:</p> <ul style="list-style-type: none"> <li>• Identify any individual in the reader pool that has outreach responsibilities in some capacity.</li> <li>• Adding measures to prevent readers from being assigned applications of a student with whom they have had more than routine contact.</li> <li>• Ensure appropriate completion of conflict of interest document described in MCA for recommendation 5.3</li> </ul>	<p>December 1, 2019</p>
<p>6.1 Implement controls to periodically review admissions IT system access to ensure that the level of access is aligned with job responsibilities including, at a minimum, a review of user access before each annual admissions cycle begins.</p>	<p>Admissions Operations and Enrollment Management Technology Services (EMTS) teams will develop annual review of access to all systems used in admissions cycle: Apply UC, UC Transfer Review Tool, Slate, ISIS, Blade, Rapid Insights.</p>	<p>December 1, 2019</p>

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<b>Recommendation</b>	<b>Management Corrective Action</b>	<b>Target Date</b>
6.2 Implement controls to log activity in admissions IT systems and periodically review high-risk changes, such as admissions decision changes, for appropriateness. Campuses should define high-risk changes to review and monitor.	Admissions Management will: <ul style="list-style-type: none"> <li>• Identify and define high-risk changes that require monitoring.</li> <li>• Admissions Operations and EMTS teams to ensure that current systems all have activity logs.</li> <li>• Implement activity log review at key points in the admissions cycle (e.g., decision release)</li> </ul>	December 1, 2019
7.1 If the campus maintains a limit for athletics admissions slots, implement a process for a department independent of athletics to perform a regular documented review of the limit for appropriateness, based on established criteria, to ensure that athletics is not allocated an excessive number of slots, and adjust the limit as necessary. This review should be performed at least every two years and should assess the limit for each sports program if separate limits are established for each program.	Under old policy (sunset Fall 2019 admission cycle), 50 late space requests were allowed. These requests were documented by Athletics and Admissions. The campus no longer maintains a limit for athletics admissions slots under the new policy, Procedures for Athletic Review (PAR) approved by the local Academic Senate Committee on Admissions at the June 2019 meeting.	NA
8.1 Establish a policy addressing conflict of interest requirements for athletics personnel including, at a minimum, a requirement to formally disclose and review any known existing relationship between a member of the athletics staff and a prospective student athlete or their family to determine if a potential conflict of interest exists and whether it should be addressed with a management plan.	Athletics Management will establish a conflict of interest policy for the department that all athletics personnel must annually sign requiring them to disclose any known existing relationship between themselves and a PSA of UC San Diego or their family. Athletics management will review these relationships.  In addition, Athletics Management will establish policy that specifically addresses conflict of interest and process by which coaches must disclose pre-existing relationships with PSAs or their families submitting on PSA list.	January 31, 2020



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<b>Recommendation</b>	<b>Management Corrective Action</b>	<b>Target Date</b>
8.2 Perform an analysis to identify categories of third parties who contact the athletics department regarding prospective student athletes that are unusual or at a higher risk of inappropriately influencing admissions decisions, such as donors, admissions consultants, and athletic recruiting/scouting services not approved by the NCAA. Establish a requirement for all athletics personnel to document all contact from these categories in a central repository. Athletics compliance should at least annually review this list and investigate any questionable contact.	Athletics will perform an analysis to identify and define “higher risk” contact and establish a policy and process by which coaches must document said contact. Athletics will further establish policy and process by which Athletics Compliance will annually review documented contact.	January 31, 2020
8.3 Provide regular training to athletics personnel on the conflict of interest requirements discussed in recommendations 8.1 and 8.2.	Athletics Management will determine timing and type of training to be provided to athletics staff.	December 31, 2020
9.1 Establish a policy requiring a minimum of one year of participation in an athletic program for non-scholarship student athletes recommended for admission by the athletics department. This policy should include: <ul style="list-style-type: none"> <li>• Any exceptions to this requirement</li> <li>• Approval requirements for any exceptions to the policy</li> <li>• Consequences for violating the policy</li> </ul>	Athletics will develop a policy that requires that all non-scholarship student-athletes must sign an Institutional Commitment Letter (ILI). The letter (ILI) carries a one year guarantee of roster spot from institution, with built in exceptions (violation of team rules, etc.). Also, Athletics will update policy to outline exceptions and required approvals and consequences with the acknowledgment that there are many legitimate reasons why participation in an athletic program may cease.	December 31, 2020
9.2 As a condition of admission, require non-scholarship athletes recommended for admission to sign an agreement that they will comply with the minimum participation requirement, subject to the consequences established in the policy.	Athletics will update policies to require that all non-scholarship student-athletes be required to sign an Institutional Commitment Letter (ILI) and that the ILI include a minimum participation clause that PSA must sign attesting that they are signing in good faith that they are committed to fully participating with the team for a minimum of one year.	December 31, 2020

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<b>Recommendation</b>	<b>Management Corrective Action</b>	<b>Target Date</b>
9.3 Establish controls to ensure records supporting ongoing participation in athletics are kept current throughout the season.	Records supporting ongoing participation in athletics already exist including: practice logs, statistics, travel documents, attendance at required meetings/programs, required participation forms and medical screenings. A process already exists for removals from roster that include reasons for removal. Athletics compliance procedures will include quarterly reviews to monitor records are kept current.  Athletics Management will explore if necessary to create any additional cross check of participation and process by which to review any anomalies.	December 31, 2020
9.4 Establish controls to independently monitor compliance with the one-year minimum participation requirement for non-scholarship student athletes recommended for admission.	Athletics Compliance will annually audit PSA list for anyone who did not comply with one-year policy and annually review report with Director of Athletics and Chief Ethics and Compliance Office.	December 31, 2020
9.5 Provide regular training to athletics staff on the minimum participation policy requirements.	Athletics to determine timing and type of training to be provided to athletics staff on the minimum participation policy requirements.	December 31, 2020
10.1 Restructure the reporting relationship of the campus athletics compliance officer to add a direct reporting line to the campus chief ethics and compliance officer.	Athletics already has dual reporting line to Chief Ethics & Compliance Officer as of summer 2018.	Implemented
11.1 Establish a policy limiting communication between development personnel and the admissions office regarding admissions matters. At a minimum, any communication regarding the admission status of specific applicants should be prohibited.	Admissions will develop a policy limiting communication between development personnel and the admissions office regarding certain admissions matters.	December 1, 2019

**Audit of Undergraduate Admissions Management Corrective Actions – UCSD  
UCOP Project No. P19A019 and AMAS Project #2019-60**

<b>Recommendation</b>	<b>Management Corrective Action</b>	<b>Target Date</b>
11.2 Perform a review prior to admission for each non-scholarship recruited athlete to identify any donations from any known relatives of the recruited athlete, or anyone that the athletics department knows to be acting on behalf of the family. A member of senior leadership independent of the athletics department or an existing athletics admissions oversight committee should oversee this review process, including determination of any due diligence required when donations are identified, and approval of any admissions decisions for which donations were identified.	Athletics will establish policy and process in conjunction with Advancement to cross check non-scholarship student-athletes on the PSA list for any known connections with donations. Policy to likely include establishing a dollar-threshold that triggers additional review. Also, Athletics will establish processes such that a member of senior leadership independent of the athletics department or the local Academic Senate Committee would oversee this review process including determination of any due diligence required when donations are identified, and approval of any admissions are independent of any donations.	January 31, 2020

***LOCAL UCSD MANAGEMENT CORRECTIVE ACTIONS***

<b>Recommendation</b>	<b>Management Corrective Action</b>	<b>Target Date</b>
12 Campus standardize nomenclature between Admissions and Athletics and use “PSA list” instead of “admit list” for the excel spreadsheet provided to Admissions from Athletics.	During this review, Athletics Management changed practices to now use language consistent with Admissions (“Prospective Student Athlete (PSA) list”), staff have been educated, and all documents going forward will reflect proper nomenclature	Implemented
13 Athletics should consider increased awareness or ways for students to report any suspicious activity with regard to the recruitment of student-athletes.	During this review, Athletics Management has implemented a reporting system that allows student-athletes to submit real-time reports of any issues/concerns through a system called Real Recruit. Student-Athlete have been educated on Real Recruit where they can anonymously report concerns.	Implemented