



AUDIT AND ADVISORY SERVICES  
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August 26, 2019

To: Lisa Przekop, Director  
Office of Admissions

Re: **Undergraduate Admissions  
Audit Report No. 08-19-0020**

We have completed an audit of undergraduate admissions. This audit was included in the 2018-19 annual audit services plan, as requested by Ethics, Compliance, and Audit Services. The audit was conducted in conformance with the *International Standards for the Professional Practice of Internal Auditing*. Enclosed is the report detailing the results of our work.

We sincerely appreciate the cooperation and assistance provided by personnel in the Office of Admissions, Intercollegiate Athletics, College of Creative Studies, Department of Music, and Department of Theater & Dance.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Ashley Andersen".

Ashley Andersen  
Director  
Audit and Advisory Services

Enclosure

cc: Chancellor Henry Yang  
David Marshall, Executive Vice Chancellor  
Margaret Klawunn, Vice Chancellor Student Affairs  
Chuck Haines, Assistant Chancellor for Finance and Resource Management  
Mike Miller, Assistant Vice Chancellor Enrollment Services  
John McCutcheon, Director Intercollegiate Athletics  
Paul Spickard, Committee Chair on Admissions, Enrollment & Relations with Schools  
UCSB Audit Committee  
Alex Bustamante, Senior Vice President and Chief Compliance and Audit Officer

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UCSB Audit and Advisory Services

Internal Audit Report

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**Undergraduate Admissions**

August 26, 2019

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**Performed by:**

Antonio Mañas Melendez, Associate Director  
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**Approved by:**

Ashley Andersen, Audit Director

Report No. 08-19-0020

## **EXECUTIVE SUMMARY**

### **OBJECTIVE**

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.

### **CONCLUSION**

Based on the results of the work performed within the scope of our advisory services, we found that there are opportunities to improve internal controls related to admissions of incoming freshman and transfer students to help reduce the risk of fraudulent admissions in the following areas:

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

These opportunities for improvement are detailed in the remainder of the audit report. The recommendations, management corrective actions and the expected dates of implementation are referenced in the Appendix.

## **OBSERVATIONS, RECOMMENDATIONS, AND RESPONSES**

### **OBSERVATIONS**

A walkthrough of the general admission process at UCSB revealed opportunities for improvement in the following areas:

#### **1. DOCUMENTATION SUPPORTING THE ADMISSIONS PROCESS**

Office of Admissions has adequate documentation and systems that support the coding, scoring, review and evaluation of applications through online systems, namely Inside Admissions and UCSB Undergraduate Admissions System (UADMS). However, we found opportunities to improve information to support the application scoring and admission decisions for admissions by exception and special talent admissions cases.

- There are limited notes supporting readers' and evaluators' scoring and the justification for admission by exception decisions. We were informed that, due to the volume of applications, readers and evaluators are unable to provide detailed notes to support their decisions.
- When prospective athletes go through the transcript evaluation process in ARMS the support documentation and evidence required to evaluate athletes has not been formalized. Office of Admissions personnel do not have criteria to determine athletic ability even though they have access to each athlete's information.
- The departments provide limited support documentation for special talent admission and admission by exception.

College of Creative Arts, Department of Music and Department of Theater and Dance provide a list of recommended applicants in cases of special talent admissions and a letter from the Dean or the Chair in cases of admissions by exception.

Intercollegiate Athletics provides only a list of prospective athletes, but Office of Admissions has access to applicants' records in the Intercollegiate Athletics system, ARMS.

- We found that the evaluation report forms used by the departments could be improved to prevent someone from including names of applicants that did not pass the department's selection process. The evaluation form had blank lines and the committee panel's signatures were included only on the last page and not on all pages of the documents, which could allow unauthorized additions to be covered by the panel's signatures.

Recommendation and management corrective action. Please see Appendix section 1.1 and 1.2.

#### **2. VERIFYING APPLICATION INFORMATION**

Office of Admissions verifies the academic qualifications of applications to ensure the accuracy of the reported data for all students who are admitted to the University. However, some socio-

economic factors (for the exception of where applicants attended high school) are harder to verify and therefore not verified by Office of Admissions.

Office of Admissions relies on the verification process facilitated by University of California Office of the President (UCOP) Systemwide Undergraduate Admissions. UCOP Systemwide Undergraduate Admissions began verifying the academic and non-academic achievements of a limited sample of applicants using a third-party vendor in 2002.

There are no campus specific recommendations. UCOP Systemwide Undergraduate Admissions is revamping its systemwide verification process to remedy the findings.

### **3. SPECIAL TALENT ADMISSIONS**

Office of Admissions receives and approves recommendations for admission from selected departments to admit certain talented applicants and athletes into their programs or sports. We found that the supporting documentation for recommendations of special talent is not always sufficient to ensure that the special talent is verified and legitimate. Specifically, we found:

- Recommendations originate from the head coaches through the Assistant Athletic Director for Student Services and then on to the Office of Admissions. Office of Admissions conducts internet searches to authenticate information submitted for review within the application. However, the support documentation for the recommendation do not confirm that the athletic ability is always verified.
- College of Creative Studies, Department of Theater and Dance, and Department of Music recommend a panel to identify special talents during the selection process. However, a faculty panel is not strictly enforced. One faculty member can make the decision to accept or reject an applicant.
- All recommendations from the departments are submitted to the Office of Admissions through liaisons in the form of a list. Emailed communications on the lists of recommended applicants do not always include panel members, coaches, or any other person in the department. This approach does not support that the recommending parties involved verify the list.

Recommendation and management corrective action. Please see Appendix section 3.2, 3.3, 3.4, 3.5 and 3.6

### **4. ADMISSION BY EXCEPTION**

The Office of Admissions occasionally receives recommendations from evaluators and readers on applicants they identify with special characteristics that trigger admission by exception. Additionally, staff, faculty and department could recommend an evaluation of a candidate they know to have exceptional cases or talent.

The Director of Admissions holds all recommendations to UC minimum academic requirements; and reviews for admission by exception, any student who does not meet this standard. The Director of Admissions approves these recommendations when she is convinced that applicants can academically succeed at UCSB outside their program or sport. However, we found that:

- Office of Admissions has not always explicitly documented the exceptional characteristics that caused an applicant to be identified or considered for admissions by exception. The qualitative characteristics to consider a prospective student as an exceptional athlete are partially documented.
- The supporting document to justify admission by exception by other departments is a letter to the Office of Admissions, signed by the Dean or Chair, outlining the strength the student would bring to the department. The acceptable rationale to support the applicant's talent has not been defined.

Recommendation and management corrective action. Please see Appendix section 4.2, 4.3, and 4.4

## **5. CONFLICT OF INTEREST IN ADMISSIONS REVIEW & ATHLETICS**

USCB has procedures to reduce conflict of interest by officials involved in the admission review process. However, we found that the process lacks sufficient documented conflict of interest policies and procedures that cover all individuals who participate in or influence the review of applications as follows:

- Coaches are required to document their encounters and every communication with prospective athletes. However, there is no requirement for coaches to sign any attestation to disclose their acquaintances or formal protocols in place to identify and review personal relationships between athletics personnel and prospective student athletes or their families. There are also no established mechanisms to identify and report suspicious contact from third parties regarding prospective student athletes.
- Readers are trained to pass assigned files into the "bias bin" for applicants they might personally know or that attended schools where they are currently employed. Readers sign an integrity statement, but this statement does not specifically state that they should not review files of applicants they personally know.
- Faculty panels participating in the admission process are informed to recuse themselves of evaluating applicants they know or when there is a potential conflict of interest. However, there is no requirement related to this disclosure. We were informed that sometimes faculty encourage applicants with special talents to apply to specific programs. It is unclear if in these cases faculty should recuse themselves of the evaluation process.

Recommendation and management corrective action. Please see Appendix section 5.1, 5.2, 5.3, 5.4, 8.1, 8.2 and 8.3

## **6. ADMISSION IT SYSTEM ACCESS**

UCSB supports the admission process with a variety of IT systems that provide admissions personnel, evaluators, and readers the ability to review the full application and curriculum of applicants, read the essays and enter a score, and input admission decisions directly by those with security access. Intercollegiate Athletics currently supports the evaluation and approval of all prospective athletes through ARMS.

We noted that there is the capability to monitor and review user activity on admissions-related IT systems. We were informed that there are logs for changes to admission decisions; however, it is unclear if the department periodically reviews these logs to identify unauthorized or high-risk changes.

Recommendation and management corrective action. Please see Appendix section 6.1 and 6.2

## **7. ATHLETICS DEPARTMENT RECOMMENDATION LIMITS**

Intercollegiate Athletics is allotted 165 slots per year that cover athletes on recommendation and admission by exception. We noted that the athletic slot limit is not periodically reviewed and monitored. Additionally, the department has never expended this number.

Recommendation and management corrective action. Please see Appendix section 7.1

## **8. MONITORING STUDENTS' PARTICIPATION IN ATHLETIC PROGRAMS**

We observed that there are no established requirements for a minimum period of participation for students recommended for admission. We found the following practices:

- In Intercollegiate Athletics, participation for athletes is at will. There are no minimum participation requirements for athletes in athletic programs for a minimum period of time. Once enrolled, student athletes can quit with no consequences. Even though athletes' participation is monitored, they are not required to participate in the respective sport.
- Applicants who are recommended by departments to be admitted do not have any requirement that ties them to the program - students can quit the program with no consequences. This includes applicants who are "selective" but not competitive or applicants admitted by exception based on their talents or extreme circumstances.

Recommendation and management corrective action. Please see Appendix section 9.1, 9.2, 9.3, 9.4 and 9.5

## **9. INDEPENDENCE OF ATHLETICS COMPLIANCE**

Intercollegiate Athletics has an athletics compliance officer who oversees important monitoring activities within the department. However, we observed that he does not have a reporting relationship independent of the Director of Intercollegiate Athletics, making him vulnerable to undue influence.

Recommendation and management corrective action. Please see Appendix section 10.1

## **10. MONITORING OF DONATIONS AND ADMISSIONS**

We found that the Office of Development coordinates all donations. However, there is an opportunity to strengthen the language in the *Regents Policy 2202; Policy Barring Development Considerations from Influencing Admissions Decisions* to more explicitly prohibit development and legacy considerations from influencing admissions decisions. We observed that:



- In Intercollegiate Athletics, usually, they are not aware of donor's names. However, some donations for specific projects are known.
- In the College of Creative Studies, donations usually come from parents of past or current students but not prospective students. These donations according to the Dean do not influence their admission process even though they know who the donors are.
- In the Office of Admissions, legacy and giving history are not part of the selection process. The application does not collect information to identify legacy history or parental giving. It is unclear as to how the office would handle influences from Alumni Board Members, the UC Regents, or campus trustees.

Recommendation and management corrective action. Please see Appendix section 11.1, 11.2 and 11.3

## GENERAL INFORMATION

### BACKGROUND

On March 18, 2019, President Napolitano requested that Internal Audit Departments on all UC campuses provide an independent assessment of the admission practices throughout the system. This directive was initiated following the Department of Justice's indictment outlining charges against individuals accused of cheating and accepting bribes to gain students' unlawful admission to top universities, including the University of California. In response, Audit and Advisory Services amended the 2018-19 annual audit service plan, to include an advisory service regarding admission practices at UCSB.

#### ***Admission Process<sup>1</sup>***

The entrance requirements established by the University follow guidelines set forth in the master plan, which requires that the top one-eighth of the state's high school graduates, as well as those transfer applicants who have successfully completed specified college work, be eligible for admission to the University of California. The Office of Admissions at UC Santa Barbara uses the University of California comprehensive review process when evaluating applicants. The UC comprehensive review process consists of nine and 14 criteria for transfer and freshmen student respectively.

Transfer selection places priority on academic factors such as Grade Point Average (GPA), units completed, and in some cases, preparation for the major selected. UCSB only admits transfer applicants based on their academic credentials. Requirements are articulated in the Edit Rules guidelines<sup>2</sup>.

UCSB uses the following breakdown when evaluating freshman applicants:

- 50% UC GPA, “a-g” courses, and exam scores - Academic Preparation Review (APR)
- 50% Personal Insight Questions & activities - Academic Promise Review (PPR)

This breakdown is evaluated on a point system, with 36 points being the highest score. Each section is made up of 18 points. The APR is based on criteria which include GPA and SAT/ACT<sup>3</sup> scores.

The PPR is calculated in two parts, each totaling nine points, a socio-economic status assessment and a comprehensive assessment that is done by certified readers. The PPR seeks to identify an applicant's curricular, co-curricular, or experiential skills, knowledge, and abilities which, when coupled with the Academic Preparation Review, provides a comprehensive view of an applicant's potential for success at UCSB. The computer scores nine marks on the socio-economic status assessment. There are 120 readers (that include UCSB faculty and staff, retired faculty and staff, teachers, and other professional community members) and 14 evaluators who focus on the comprehensive review section of the applicant's application and assign up to nine marks.

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<sup>1</sup> UCSB Office of Admissions website, department procedures, auditor analysis and interviews.

<sup>2</sup> Edit Rules: This is a local policy that spells out in detail the subject requirements for both freshmen and transfers students.

<sup>3</sup> SAT/ACT: Scholastic Aptitude Test / American College Test.

Senior evaluators monitor applications scored by readers to ensure scores fall within established rubrics. Office of Admissions defines the cut-off point based on estimations provided by Institutional Research. Applicants are classified in tiers based on the score (up to 36).

### ***Recommendation process***

During the admission process, select departments send recommendations for applicants they want to admit into their programs after applicants have fulfilled additional requirements to be admitted into such programs. The select departments are Intercollegiate Athletics, College of Creative Studies, Department of Music, and Department of Theater & Dance. Occasionally, staff, faculty or other departments could suggest some applicants be evaluated.

Office of Admissions receives and reviews the lists for consideration.

- If applicants are admitted and selected, they are granted admissions and their programs are assigned. If the applicant is admitted but is rejected by the department, for example, the applicants did not pass the audition, he/she is offered to be admitted to another major.
- If they do not meet minimum requirements but are recommended by the departments, each applicant will be reviewed on a case by case basis for admission by exception by the Director of Admissions.

### **Intercollegiate Athletics Admission<sup>4</sup>**

Many admitted student athletes are competitive in the UCSB selection process. Since 1998, admission to UCSB has been selective. However, they continue to reserve a limited number of spaces for freshmen and transfer athletes who meet admission requirements - 165 slots are reserved for athletes. Athletics slots are to be used only for applicants who have a verifiable record of athletic achievement and will play regularly on the team for which they were recruited, barring any unanticipated impediments. Slots are intended to be used for individuals who could likely be a scholarship player should such funds become available. Intercollegiate Athletics usually reserve these slots for applicants that have not been accepted in the regular process.

Prospective athletes go through transcript evaluation and approval process in ARMS – this software has been operational for a little over a year. Their profiles are reviewed and approved by officials within Intercollegiate Athletics and the Office of Admissions. On occasion, Office of the Registrar and academic advisors in the College of Letters and Science also provide comments on the evaluation in case of possible transfer athletes. This transcript evaluation process is independent of the admission process in the Office of Admissions.

After Office of Admission's review, applicants who are denied but for whom coaches desire to use a slot will have a request letter signed and submitted to the Assistant Athletic Director of Student Services who then reviews and approves the requests and forwards the list through email to the Office of Admissions to utilize slots.

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<sup>4</sup> Intercollegiate Admissions Guidelines 2017-2018 and interviews.

### **College of Creative Studies (CCS)<sup>5</sup>**

CCS requires a supplemental application. CCS is interested in applicants who clearly express passion for the program, candidates that want to create and/or discover new material in their discipline and are considered junior colleagues to faculty members. Applicants additionally must submit an application through the CCS online application system. Applications are then reviewed by a minimum of two and a maximum of four faculty members depending on their major. Once the panel decides which students will be admitted to CCS, CCS's liaison to Office of Admissions sends an excel file through email to the Office of Admissions.

After Office of Admission's review, if CCS believes any denied applicants could add value to the department and can be considered by exception, the Dean makes the request to support the applicant to be admitted by exception by outlining the applicant's strengths and weaknesses.

### **Department of Music**

Department of Music requires applicants to successfully perform an entrance audition. The audition in the Music Department will determine whether or not an applicant is suitable for the Bachelor of Music program, or lessons with faculty. Applicants interested in a Bachelor of Art (BA) or a Minor are not required to audition. A faculty panel witnesses the auditions. At the end of the audition, all members of the panel sign the form called "Entrance Auditions Committee Report" to accept the decisions made on the applicants. The Department of Music sends a letter to each applicant who auditioned informing them of their status (*Pass/Fail*). The letter explicitly states that ultimately Office of Admissions will inform them if they have been granted admission to the University and that passing the audition does not guarantee admission to the University. The department liaison uploads the list of applicants who passed the audition and have been accepted into the program into a Box folder and informs Office of Admissions.

After Office of Admission review, if the department deems any of the denied applicants would add value to the department, a letter is typically drafted by the recommending professor, signed off by the chair of the department and submitted to the Office of Admissions to be admitted by exception.

### **Department of Theater & Dance**

Applicants applying to UCSB as a Bachelor of Arts - Dance major are also required to successfully perform an entrance audition. Applicants can also send in an audition video. Additionally, applicants also complete a questionnaire which is also assessed. The questionnaire provides information on the applicant's passion and understanding of the program, and how long the candidate has trained or prepared for the program. The department specializes in ballet and contemporary dance. During auditions, there is a panel of 8-9 faculty members who each have an evaluation sheet for each applicant auditioning. The average score of each applicant is calculated and students are scored with a *Yes, Yes/Maybe, No/Maybe, or No* and are voted on.

After decisions have been reached on which applicants to accept, the department sends a list of recommended applicants to the Office of Admissions to be admitted into the program. The department occasionally writes letters to support a few of the talented students to be admitted by exception.

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<sup>5</sup> Auditor analysis and interviews.

### ***Admission by Exception Process***

Each year, a small number of applicants who have the ability and potential to succeed at UCSB — but don't meet the academic requirements — are admitted by exception. Applicants may use the personal insight questions or additional comments section of the admission application to explain their unique story. Admissions by exception only includes applicants who do not meet UC minimum requirements. Eligible applicants are not included in this process.

Typically, Office of Admissions will notify all department liaisons of the admission status (*Accepted/ Denied*) of the list they receive from them. If the departments find any applicant can be considered by exception, the department's Chair or Dean will send a letter supporting admission by exception. The letter will outline the relevant strengths that the applicant brings to the department. Coaches who desire to use a slot for admission by exception will have a request letter signed and submitted to the Assistant Athletic Director of Student Services who then reviews and approves the requests and forwards a list through email to the Office of Admissions to utilize slots.

The Admissions Director reviews the explanations for the requests and evaluates the likelihood that the applicant could be successful in courses outside of the major or sport. This would include GPA, test scores, coursework in academic areas outside of the major, evidence of improved coursework during the senior year of high school, evidence of athletic ability, and the essays submitted as part of the application. If the Admissions Director feels the applicant can succeed, she will grant admission by exception. Very few students with low grades are admitted by exception.

### ***Application Verification***

Applicants have to attest during their application that all information in their applications is true. All applicants who are admitted must submit official transcripts and test scores. This information is compared with the self-reported information on the application. When discrepancies are found, applicants are contacted and asked to provide an explanation and/or supporting documentation. On occasion, evaluators will identify information within an application that appears fraudulent. These cases are referred to the UCOP verification committee. Some socio-economic factors are harder to verify and therefore not verified.

Additionally, UCOP verifies 1.5% of applications to ensure the information in their applications is true and accurate.

### **Admission IT systems**

UCSB has a variety of IT systems that supports the admissions process in the Office of Admissions and Intercollegiate Athletics.

- Undergraduate Admissions System (UADMS) is a campus-built system providing evaluators with multiple screen views of the data obtained from the applicant. Admission decisions can be input in this system directly by those with permission (evaluators, the Associate Director, & the Director), or batch jobs that pull in large groups of admits at one time.
- Inside Admissions is a campus-built system used by readers to review the full application, review the full curriculum of the applicant, read the essays, and enter a score between 1-9 for the Comprehensive Review read score.

- UC Review is a system built by UC Office of the President to review detailed academic information for transfer applicants.
- Student Affairs Data Warehouse is a campus-built data warehouse to archive all applicants' data.
- Intercollegiate Athletics currently uses ARMS for all prospective athletes. This has been operational a little over a year.

## **SCOPE AND METHODOLOGY**

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

- 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 ICA 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

## **CRITERIA**

We conducted a walkthrough of the general admission process to gain an understanding of the policies, procedures and controls currently in place to ensure compliance with relevant policy and regulatory requirements and to prevent or detect fraudulent admissions. Additionally, we interviewed officials from the Office of Admissions, Intercollegiate Athletics, College of Creative Studies, Department of Music, and Department of Theater & Dance.

Our review was based upon standards as set forth in the UC and UCSB policies, best practices, and other guidance relevant to the scope of the audit. We did not assess the organization's adherence to these controls as part of this audit. A second audit, scheduled for 2019-20 fiscal year, will assess the operating effectiveness of controls identified in this review, including any effects that may be found as a result of potential deficiencies. This review was conducted in conformance with the *International Standards for the Professional Practice of Internal Auditing*.

This review emphasized, but was not limited to, compliance with:

- Regents Policy 2105\_ Policy on Undergraduate Admissions by Exception
- Policy On Undergraduate Admissions By Exception
- Guidelines for Implementation of University Policy on Undergraduate Admissions
- Comprehensive Review Reader Manual Fall 2019
- Intercollegiate Athletic Annual Guidelines

**AUDIT TEAM**

Ashley Andersen, Audit Director  
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**APPENDIX**

**RECOMMENDATIONS AND  
MANAGEMENT CORRECTIVE ACTIONS**



Table 1		Systemwide Audit of Undergraduate Admissions Management Corrective Actions	
No	Recommendation	Management Corrective Action	Target Date
1.1	<p>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 application evaluations that consider qualitative factors, a requirement that at least two independent documented evaluations support any decision to admit</li> </ul>	<p>Admissions has documented detailed local policies, procedures, and guidelines regarding the Admissions process, such as General Admissions – Edit Rules, Comprehensive Review Reader Manual, and Evaluation Guidelines.</p> <p>Admissions with the support of Committee on Admissions, Enrollment &amp; Relations with Schools (CAERS), and other campus departments will review and update local policies, procedures, and guidelines regarding the admissions review process, to be sure they are current, complete, and enhancements suggested in this audit are properly documented including minimum documentation.</p> <p>Admissions decisions for freshmen and transfer applicants are coded in the UADMS. Transfer evaluations follow criteria that are well articulated in the Edit Rules policy.</p> <p>Admissions will ensure that for all freshmen who are admitted, they will have at least two independent documented evaluations to support their admission. This is due to the impossibility to document evaluations for all over 100,000 applications.</p> <p>Owner: Director of Admissions</p>	<p>11/29/2019 to finalize all documents used to train readers and define selection criteria</p> <p>6/1/2020 to submit summary report to CAERS documenting parameters used in final determination of single-read vs. double-read applications.</p>

Table 1		Systemwide Audit of Undergraduate Admissions Management Corrective Actions	
No	Recommendation	Management Corrective Action	Target Date
1.2	<p>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>Documentation for freshmen and transfer evaluations will follow the criteria articulated in the local policy.</p> <p>Admissions will ensure that for all freshmen who are admitted, they will have at least two independent documented evaluations to support their admission. This is due to the impossibility to document evaluations for all over 100,000 applications.</p> <p>Admissions decisions for freshmen and transfer applicants are coded in the UADMS. Personnel of admissions use two computer systems (UADMS &amp; Inside Admissions) to document the review and decision making process. Personnel have user accounts and passwords to access the system and approvals are recorded in the workflow process.</p> <p>Personnel in Office of Admissions document in the system admission evaluations and decisions.</p> <p>We will request that Intercollegiate Athletics and departments keep all support documentation on each recommended applicant. This information could be reviewed by the Office of Admissions. Departments will be required to include names of faculty or panel members that made decisions on a candidate on the recommendation lists.</p> <p>Owner: Director of Admissions</p>	11/29/2019
3.2	<p>Clearly identify and track all applicants that departments recommend on the basis of special talent.</p>	<p>Admissions is currently “labeling” all applicants recommended for admissions based on special talent, including athletics.</p> <p>We will evaluate the possibility in our system to improve the classification of each type of special admissions and the reporting capabilities to include the criteria considered in the evaluation of the applicant; and the notes justifying admissions decisions for all recommendations, admission by exception and any other special admission.</p> <p>Owner: Director of Admissions</p>	11/29/2019

Table 1		Systemwide Audit of Undergraduate Admissions Management Corrective Actions	
No	Recommendation	Management Corrective Action	Target Date
3.3	<p>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>Admissions with the support of CAERS, Intercollegiate Athletics, and other campus departments will update policies, procedures and guidelines to document the minimum requirements for documented verification for each type of special admissions, with a special focus on athletics.</p> <p>Owner: Director of Admissions</p>	11/29/2019
3.4	<p>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>We will make adjustments to the evaluation and verification process to enforce a two-step verification process for any recommendation by special talent for each department. These enhancements will include:</p> <ul style="list-style-type: none"> <li>• Signing an attestation under penalty by the coach or the faculty and a review and approval of the recommendation by an independent body or person in a supervisory capacity.</li> <li>• At least two faculty or panel members will evaluate or witness an audition and make the decision on applicants.</li> <li>• Departments will improve their records on the evaluation forms to include all committee panel signatures on all pages and will cross out all blank lines on the forms.</li> </ul> <p>Owner: Director of Admissions</p>	11/29/2019

Table 1		Systemwide Audit of Undergraduate Admissions Management Corrective Actions	
No	Recommendation	Management Corrective Action	Target Date
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>Athletics compliance office verifies and approves athletics recommendations.</p> <p>CAERS will propose a sub-committee that will also verify and review prospective student athletes' qualifications independent of the athletic department. The Director of Admissions will approve all recommendations for athletic slots.</p> <p>A panel makes recommendations in other departments. We will ensure faculty panel evaluations and auditions results support each recommendation.</p> <p>Owner: Director of Admissions &amp; Chair, Committee on Admissions, Enrollment &amp; Relations with Schools</p>	11/29/2019
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.	<p>The Director of Admissions will approve all recommendations from departments. We will include in our evaluation the recommendations from the CAERS-Athletic sub-committee on all athletes for slots. CAERS-Athletic sub-committee will document the evaluations.</p> <p>Faculty committee approves recommendations for special talent in the departments. We will review in addition to departments' recommendation lists, the results and faculty panel notes or evaluations on each recommended applicant.</p> <p>The director will ensure that email communication on recommendation lists with department liaisons includes the chair of the departments. In addition, faculty panel evaluations and auditions results will support recommendation lists.</p> <p>Owner: Director of Admissions</p>	11/29/2019
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.	<p>Admissions with the support of CAERS, Intercollegiate Athletics, and other departments will document a local policy that will outline the characteristics that trigger admissions by exception; the required evaluation processes and approval to be followed for every exception case; and the documentation required to support each case.</p> <p>Owner: Director of Admissions</p>	11/29/2019

Table 1		Systemwide Audit of Undergraduate Admissions Management Corrective Actions	
No	Recommendation	Management Corrective Action	Target Date
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.	<p>Evaluation staff will maintain notes justifying why an applicant is considered for recommendation, admission by exception and any other special admission.</p> <p>The final decision on admission by exception and recommendations is the responsibility of the Director of Admissions who will ensure that the rationale for identification as stipulated in the policy is applied.</p> <p>Owner: Director of Admissions</p>	11/29/2019
4.4	Establish local procedures to annually monitor compliance with the campus percentage limits for admissions by exception established by Regental policy.	<p>The number of Dance, Music, and CCS requests for admission by exception is quite small (perhaps 10 per year). Athletics has 165 slots which have never been expended. A faculty panel will review this number.</p> <p>Office of Admissions will continue to monitor the compliance with systemwide limits for admissions by exception and will document a local procedure.</p> <p>Owner: Director of Admissions</p>	11/29/2019
5.1	<p>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>Office of Admissions will establish documented conflict of interest policies to cover all individuals involved in reviewing and making decisions in the application process: This will include disclosing the nature of acquaintances with known applicants or their families and attesting that they are not aware of any attempt to improperly influence an admissions decision.</p> <ul style="list-style-type: none"> <li>• Faculty and audition panel members will be required to disclose, attest under penalty, their relationship or affiliations with a prospective student.</li> <li>• Coaches and athletic personnel will be required to disclose, attest under penalty, their relationship or affiliations with a prospective student athlete.</li> </ul> <p>Owner: Director of Admissions</p>	11/29/2019

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<b>No</b>	<b>Recommendation</b>	<b>Management Corrective Action</b>	<b>Target Date</b>
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>Office of Admissions will continue training readers on conflict of interest as part of the reader’s training.</p> <p>Office of Admissions will expand the scope of training to include non-readers who may try to influence decisions by contacting Office of Admissions to show support for an applicant. This includes alumni, trustees, and development staff.</p> <p>We will expand the scope to include examples of improper influence in the context of admissions.</p> <p>Owner: Director of Admissions</p>	11/29/2019
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>Readers (internal and external), will be required to sign an attestation to disclose any current affiliations with high schools or community colleges and recuse themselves of reviewing students’ files they personally know or high schools they have affiliations with.</p> <p>Additionally, readers will be required, prior to the application review, to disclose the community colleges or high schools they are employed and all alumni groups.</p> <p>The Office of Admissions will prevent readers who have such affiliations from being assigned an application of a student from that high school or community college or alumni groups for review.</p> <p>Owner: Director of Admissions</p>	11/29/2019
5.4	Establish controls preventing individuals who perform outreach from reviewing applications from individuals with whom they have had more than routine contact.	<p>Outreach staff will be required to sign an attestation to disclose any current affiliations with high schools or community colleges and recuse themselves of reviewing students’ files they personally know or are outside of incidental contact in the scope of a visit or college fair.</p> <p>Owner: Director of Admissions</p>	11/29/2019

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No	Recommendation	Management Corrective Action	Target Date
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>Access to all admissions systems are reviewed annually. Readers are certified annually to gain access to Inside Admissions system. Director of Admissions approves access.</p> <p>All system changes create an audit record. Any changes to admit status are logged to include the date the record was changed and the user who made the change.</p> <p>The system records the number of decisions made on a candidate and any unauthorized change will show on the student's records. There is always an explanation for more than one decision on a student's record.</p> <p>We will document the procedure to review access control in the admissions systems.</p> <p>Owner: Director of Admissions</p>	11/29/2019
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.	<p>We will request a report to monitor log activity in admissions IT systems to prevent inappropriate or unauthorized admissions changes.</p> <p>Office of Admissions will include the definition of high-risk changes in the local policy. The frequency to review the high-risk changes will be defined in the policy.</p> <p>Owner: Director of Admissions</p>	3/2/2020
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.	<p>CAERS will implement a process for a department independent of Intercollegiate Athletics to perform a regular documented review of the slot limit for appropriateness. This review will occur at least every two years based on an established criterion.</p> <p>Owner: Chair, Committee on Admissions, Enrollment &amp; Relations with Schools</p>	11/29/2019

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<b>No</b>	<b>Recommendation</b>	<b>Management Corrective Action</b>	<b>Target Date</b>
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.	Intercollegiate Athletics will establish documented conflict of interest policies for athletic personnel: This will include disclosing 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.  Owner: Director of Intercollegiate Athletics	11/29/2019
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.	Intercollegiate Athletics will put in place mechanisms to identify and document unusual or high-risk third party contacts. These procedures and list of contacts will be reviewed annually by the athletic compliance for potential investigation.  Owner: Director of Intercollegiate Athletics	11/29/2019
8.3	Provide regular training to athletics personnel on the conflict of interest requirements discussed in recommendations 8.1 and 8.2.	Intercollegiate Athletics will organize and ensure regular training for Intercollegiate Athletics coaches and staff in collaboration with the appropriate campus departments regarding conflict of interest and the associated policy.  Owner: Director of Intercollegiate Athletics	11/29/2019



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9.1	<p>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:</p> <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>	<p>Office of Admissions with the support of CAERS will establish a policy requiring minimum participation for students who are recommended for admissions. This will include requiring all such students to sign an agreement to comply with the minimum requirement. This agreement will provide specific guidelines for participation including minimum requirements, the consequences for violating the policy, and any exceptions. Students required to sign the agreement will include:</p> <ul style="list-style-type: none"> <li>• Those who are eligible for admission based on UC eligibility rules but not meeting selection criteria for the applicant pool in the term to which they applied. These students are targeted for admission based on special talent.</li> <li>• Those admitted on admission by exception cases</li> <li>• Non-scholarship and scholarship athletes</li> <li>• Athletes using slots</li> <li>• Any other special admission.</li> </ul> <p>Owner: Director of Admissions &amp; Chair, Committee on Admissions, Enrollment &amp; Relations with Schools</p>	11/29/2019
9.2	<p>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.</p>	<p>All student athletes that are admitted by exception or special talent through athletics slot will be required to sign an agreement to comply with the minimum requirement. This agreement will be stored within the Inside Admissions application portal.</p> <p>Owner: Director of Admissions</p>	11/29/2019
9.3	<p>Establish controls to ensure records supporting ongoing participation in athletics are kept current throughout the season.</p>	<p>Athletics currently monitors students’ participation in ARMS application. The department will ensure that supporting records of participation in this application are kept current throughout the season.</p> <p>Owner: Director of Intercollegiate Athletics</p>	11/29/2019
9.4	<p>Establish controls to independently monitor compliance with the one-year minimum participation requirement for non-scholarship student athletes recommended for admission.</p>	<p>Intercollegiate Athletics compliance will monitor recommended students and recruited athletes’ compliance with the minimum participation requirement.</p> <p>Owner: Director of Intercollegiate Athletics</p>	11/29/2019

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9.5	Provide regular training to athletics staff on the minimum participation policy requirements.	Office of Admissions will also provide training to the department and athletics staff on the minimum participation policy requirements.  Owner: Director of Admissions	11/29/2019
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.	The Director of ICA in support with the Chief Ethics and Compliance Officer (CECO) will restructure the current reporting relationship of the athletic compliance director to include a direct reporting line to CECO.  Owner: Director of Intercollegiate Athletics & VC of Administrative Services	11/29/2019
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	Office of Admissions will establish a policy limiting communication between the personnel of Office of Development and Office of Admissions on admission status of specific applicants.  Owner: Director of Admissions	11/29/2019
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.	Office of Admissions with the support of athletics compliance and other departments will review donations, prior to admission for each non-scholarship recruited athletes or anyone known to be acting on behalf of the family.  Owner: Director of Admissions	11/29/2019

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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.	Audit & Advisory Services will periodically perform a retrospective review of donations to the campus to identify admissions decisions that could have been influenced by these donations. We will refer any questionable admissions decisions identified through this process to the Locally Designated Official for investigation.  Owner: Audit & Advisory Services	Periodically

Source: Responses from Office of Admissions, Intercollegiate Athletics, & VC Administration Services