



AUDIT AND ADVISORY SERVICES

Undergraduate Admissions

Audit

Project No. 20 -744

(Local Campus Supplemental Report to
Systemwide Audit Report P20A005)

March 31, 2020

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March 31, 2020

Stephen Sutton
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Vice Chancellor Sutton and Athletic Director Knowlton:

Phase II of the University of California systemwide audit of Undergraduate Admissions (Project P20A005) has been completed and a systemwide audit report was issued by the University of California Office of Ethics, Compliance, and Audit Services (ECAS) at the UC Office of the President on February 14, 2020. The audit report contained observations applicable to all UC campuses, including Berkeley.

In addition to the Phase II systemwide audit report, UC Berkeley's Audit and Advisory Services has issued a supplemental report which is enclosed. The supplemental report contains no additional observations in that all of Berkeley's observations were incorporated into the systemwide audit report. However, the supplemental report does include the following two attachments which summarize the work performed, campus audit results, and campus management's action plans to address the recommendations in the ECAS report:

- Attachment A – Berkeley's Management Action Plans associated with the Systemwide Audit Report
- Attachment B – Summary of Berkeley's Audit Results and Procedures

Our audit work was conducted in accordance with the Institute of Internal Auditors' *Standards for the Professional Practice of Internal Auditing* and the University of California Internal Audit Charter. Please destroy all copies of draft reports and related documents.

Thank you to the staff of the Office of Undergraduate Admissions and Intercollegiate Athletics for their cooperative efforts throughout the audit. Please do not hesitate to call on Audit and Advisory Services if we can be of further assistance in this or other matters.

Respectfully reported,

Jaime Jue
Director

Enclosures: Attachment A – Berkeley’s Management Action Plans (Systemwide Audit Report)
Attachment B – Summary of Berkeley’s Audit Results and Procedures

cc: Assistant Vice Chancellor and Chief of Staff Anne Jones
Assistant Vice Chancellor and Director Olufemi Ogundele
Director Jay Larson
Professor Ignacio Navarrete
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Senior Vice President and Chief Compliance and Audit Officer Alexander Bustamante

**University of California, Berkeley
Audit and Advisory Services
Undergraduate Admissions Audit
(Local Campus Supplemental Report to Systemwide Audit Report P20A005)**

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OVERVIEW

Executive Summary

This report supplements the Phase II UC systemwide audit report (*UC Systemwide Audit of Undergraduate Admissions* Project No. P20A005) issued by the Office of Ethics, Compliance, and Audit Services (ECAS) at the UC Office of the President on February 14, 2020. The campus' management action plans in response to the recommendations of the systemwide report are included as Attachment A. The report also contains a summary of audit results and procedures in Attachment B.

The overall objectives of the Phase II systemwide audit were to assess campus adherence to their controls over undergraduate admissions, to assess the effectiveness of campus policy and controls over undergraduate admissions, and to identify any effects of deficiencies in campus controls over undergraduate admissions.

The scope of the audit included both freshman and transfer undergraduate admissions of non-athletes and athletes. Procedures were conducted using a systemwide audit program developed by ECAS. The audit program procedures included an assessment of the operating effectiveness of, and adherence to, identified controls in the areas of special talent, admissions by exception, admissions information technology (IT) systems access, and student athlete participation. Phase II also included a design review of the appeals process.

Based upon local execution of the systemwide audit program developed by ECAS, we identified certain exceptions and additional design weaknesses that indicated opportunities to strengthen controls. These opportunities are contained within the observations and recommendations identified in the systemwide audit report. As a result, there are no additional observations included in Berkeley's supplemental report.

Management has provided action plans that we believe, if implemented, will address the items identified in the systemwide audit.

Background and Purpose of the Audit

During fiscal year 2019, the Office of Ethics, Compliance, and Audit Services (ECAS) at the UC Office of the President conducted a systemwide audit of UC undergraduate admissions. This audit was a design review of several areas identified by ECAS. The audit was performed using campus audit resources at each campus having undergraduate programs. The results were consolidated into one systemwide audit report applicable to all campuses. The Phase I systemwide report was issued June 22, 2019. UC Berkeley also issued a Phase I *Local Campus Supplemental Report* that identified several additional observations that applied solely to the Berkeley campus. The report was issued October 3, 2019. It also included management action plans pertaining to both Phase I systemwide and Berkeley campus audit observations.

During fiscal year 2020, a second phase of the systemwide audit was conducted, also under the direction of ECAS. The overall objectives of the Phase II UC systemwide audit of undergraduate admissions were to

- assess campus adherence to their controls over undergraduate admissions;
- assess the effectiveness of campus policy and controls over undergraduate admissions; and
- identify any effects of deficiencies in campus controls over undergraduate admissions.

The Phase II systemwide audit was completed and the *UC Systemwide Audit of Undergraduate Admissions* (Project P20A005) report was issued by ECAS on February 14, 2020.

In addition to the systemwide report and as directed by ECAS, Berkeley is issuing this Phase II *Local Campus Supplemental Report* containing additional information to supplement the systemwide audit report. The supplemental report is intended to be read in conjunction with the Phase II systemwide report.

The *Management Action Plans* (MAPs) for the Phase II systemwide report are included in Attachment A. A *Summary of Berkeley's Audit Results and Procedures* is presented in Attachment B.

Scope of the Audit

The scope of the Phase II UC systemwide audit of undergraduate admissions included both freshman and transfer undergraduate admissions of non-athletes and athletes. Procedures for Phase II were conducted using a systemwide audit program developed by ECAS. The audit program procedures included an assessment of operating effectiveness and the adherence to identified controls in the following areas:

- Application verification process
- Special talent admissions
- Admissions-by-exception
- Admissions information technology (IT) systems access
- Student athlete participation

Phase II also included a design review of controls over the appeals process.

Summary Conclusion

Based upon local execution of the systemwide audit program developed by ECAS, we identified certain exceptions and additional design weaknesses that led to opportunities to strengthen controls. These opportunities are contained within the observations and recommendations identified in the systemwide audit report. As a result, there are no additional observations included in Berkeley's supplemental report.

Management has provided action plans for the Phase II UC systemwide audit of undergraduate admissions that we believe, if implemented, will address the items identified in the systemwide audit.

**UNIVERSITY OF CALIFORNIA, BERKELEY
 UNDERGRADUATE ADMISSIONS AUDIT – PHASE II
 ATTACHMENT A – MANAGEMENT CORRECTIVE ACTIONS**

Recommendation	Management Corrective Action	Target Date
<p>A. Documentation Supporting the Admission Process.</p> <p>A.1 Ensure that any committee charged with making admissions decisions develop a charter that includes, at a minimum, the committee’s:</p> <ul style="list-style-type: none"> • Key objectives or purpose • Authority • Responsibilities • Membership, including term limits and voting privileges • Frequency of meetings • Review criteria • Approval or decision-making process and requirements, including quorum requirements and documentation requirements 	<p>OUA. <i>Committee Charters.</i> Charters for the Admissions Review Committee (ARC) and the Student Athletic Admissions Committee (SAAC) will be developed that contain the key objectives, responsibilities, review criteria, and other elements noted in recommendation A.1.</p>	<p>July 2020</p>
<p>A.2 Evaluate current retention practices for admissions documentation, including approval documentation, and ensure documented procedures reflect appropriate retention requirements in accordance with the UC Records Retention Schedule. Provide training to the appropriate personnel on records retention requirements.</p>	<p>OUA. <i>Retention Practices for Admissions Documentation.</i> OUA will review retention practices to ensure that admissions documentation retention procedures are in accordance with the UC Records Retention Schedule. Training will be provided, as appropriate.</p> <p>OUA. <i>Non-Athletic AbyE Documentation in SLATE.</i> Effective with the FY2019-20 admissions cycle, the Admissions Review Committee (ARC) is using the <i>ARC Committee form</i> in SLATE, to enter all ARC admissions decisions. The form entry converts to the appropriate AbyE coding and documents in SLATE that the admission decision resulted from the committee review.</p> <p>OUA. <i>Director Review Documentation in SLATE.</i> Effective with the FY2020 admissions cycle, the Admissions</p>	<p>July 2020</p> <p>Completed</p> <p>Completed</p>

**UNIVERSITY OF CALIFORNIA, BERKELEY
 UNDERGRADUATE ADMISSIONS AUDIT – PHASE II
 ATTACHMENT A – MANAGEMENT CORRECTIVE ACTIONS**

Recommendation	Management Corrective Action	Target Date
	<p>Director and his designee (the Deputy Director of Admissions) began using the Director Review Form in SLATE to enter all Director Review decisions. Use of this form documents in SLATE that the admission decision resulted from the Director Review.</p> <p><i>Athletics. Athletic Special Talent - SAAC Committee Approval Documentation and Retention.</i> The Athletics OUA officer will include on the SAAC Log a statement as to why the applicant is being reviewed by the SAAC Committee. In addition, following each meeting, the SAAC co-chairs will sign the SAAC Log, and the OUA officer will email the Log to SAAC members and the IA Compliance Director for retention in accordance with guidelines</p>	<p>March 2020</p>
<p>C. Special Talent Admissions (“Special Admissions”)</p> <p>C.1 Implement controls to ensure that applicants recommended on the basis of special talent are identified and tracked in accordance with the guidance to be provided by Systemwide Undergraduate Admissions as recommended in the Phase 1 Audit.</p>	<p>OUA. <i>Systemwide Guidance – Special Talent.</i> OUA will implement controls to identify and track special talent applicants in accordance with the guidance provided by Systemwide Undergraduate Admissions.</p> <p>OUA. <i>Documentation of Non-Athlete Special Talent.</i> The manual process and criteria for non-athletic applicants considered for admission as a special talent will be formalized and documented as part of the non-athlete special talent policy and process being developed in accordance with Phase I MAPs. This policy will address identification of applicants as special talent.</p>	<p>March 2020</p> <p>March 2020</p>

UNIVERSITY OF CALIFORNIA, BERKELEY
UNDERGRADUATE ADMISSIONS AUDIT – PHASE II
ATTACHMENT A – MANAGEMENT CORRECTIVE ACTIONS

Recommendation	Management Corrective Action	Target Date
	<p>Athletics. <i>Documentation of Athlete Special Talent.</i> Effective fall 2019, enhancements were made to the <i>Endorsement Form</i> for athletes who will not receive an athletic scholarship. The head coach is now required to identify the prospect’s specific special talent and athletic aptitude, provide a statement as to why the prospect is being recruited and how the prospect is expected to contribute to the team’s success on the playing field. Head coaches are also required to attach or otherwise provide documentation and support of an applicant’s athletic history and accolades, including all prospective student athletes who will not receive an athletic scholarship and those who will receive a minimal (books) scholarship. The <i>Endorsement Form</i> is reviewed by the Athletic Compliance Director.</p> <p>Athletics/OUA. <i>Reconciliation.</i> The OUA Admissions Analyst for Athletics and the Athletics Department Recruiting Coordinator will work together to ensure SLATE and the Master Recruit List are reconciled.</p>	<p>Completed</p> <p>March 2020</p>
<p>C.2 Evaluate current retention practices for documentation supporting special talent recommendations and ensure documented procedures reflect appropriate retention requirements in accordance with the UC Records Retention Schedule. Provide training to the appropriate personnel on records retention requirements.</p>	<p>OUA. <i>Retention Practices for Special Talent.</i> OUA will ensure that documented procedures for retention of documentation supporting special talent recommendations are in accordance with UC requirements. Training will be provided, as appropriate.</p>	<p>March 2020</p>
<p>D. Admission by Exception</p> <p>D.3 Implement controls to ensure accurate classification of Admissions by Exception for all students that campuses</p>	<p>OUA. <i>Admission-by-Exception in SLATE.</i> OUA will implement controls to ensure accurate classification of</p>	<p>March 2020</p>

UNIVERSITY OF CALIFORNIA, BERKELEY
UNDERGRADUATE ADMISSIONS AUDIT – PHASE II
ATTACHMENT A – MANAGEMENT CORRECTIVE ACTIONS

Recommendation	Management Corrective Action	Target Date
<p>F.1 Implement controls such as required forms to ensure the reason for changes in athletic program participation status are clearly documented.</p>	<p>Athletics. <i>Change of Status Review and Documentation.</i> While coaches currently submit a <i>Change of Status Form</i> whenever a student athlete departs a team for any reason, going forward, Athletic department personnel will review and approve all Change of Status forms and will ensure that the forms sufficiently indicate the reason the athlete left the team. In addition, the Athletic Compliance Director will conduct an exit interview of all athletes leaving the team within the first year but remaining as a student at Berkeley.</p>	July 2020
	<p>Athletics. <i>Limited Experience Athletes.</i> Policy will be created requiring that all athletes with limited experience in the sport for which they are being recruited be identified, supported/documentated by the head coach (see C.1 above), interviewed by OUA and/or the Athletic Compliance Director, and approved by SAAC.</p>	July 2020
	<p>Athletics. <i>Participation Training and Monitoring.</i> Effective fall 2019, regular training of coaches was enhanced as related to minimum participation requirements and necessity to keep updated practice and participation logs. In addition, end-of-semester meetings will be held between each head coach, the Athletic Compliance Director, and others to review the head coach’s documentation related to athletic participation</p>	March 2020
<p>G. Admissions Appeal Process</p> <p>G.1 Develop or amend local policies and procedures to address requirements for all appeals decisions. The policies and procedures should include the</p>	<p>OUA. <i>Transfer Appeals.</i> The OUA will include all appeal types in the planned review of colleges/schools admissions practices, as noted in the MAP for the</p>	June 2020

**UNIVERSITY OF CALIFORNIA, BERKELEY
 UNDERGRADUATE ADMISSIONS AUDIT – PHASE II
 ATTACHMENT A – MANAGEMENT CORRECTIVE ACTIONS**

Recommendation	Management Corrective Action	Target Date
<p>following:</p> <ul style="list-style-type: none"> • <i>A requirement that all appeal reviews be fully documented, including analyses, recommendations, decisions, and individuals involved.</i> • <i>A requirement that at least two individuals or a committee be involved in appeals reviews, and if final decisions are contrary to initial recommendations, the rationale for final decisions must be documented.</i> 	<p>Phase I – Local Report. The planned review will include developing and/or amending local policies and procedures to address requirements.</p> <p>OUA will ensure that all appeals reviews are fully documented in accordance with recommendation G.1.</p> <p>OUA will ensure that at least two individuals or a committee are involved in appeals reviews and that rationale for final decisions is documented.</p> <p>OUA. <i>Athletic Appeals.</i> OUA will develop an athletic appeal process so that athletes who wish to submit an appeal may do so only after the official denial decision is released. These appeals will be brought before SAAC.</p>	<p>June 2020</p> <p>July 2020</p> <p>June 2020</p>

**UNIVERSITY OF CALIFORNIA, BERKELEY
 UNDERGRADUATE ADMISSIONS AUDIT – PHASE II
 ATTACHMENT B -- SUMMARY OF AUDIT PROCEDURES AND RESULTS**

Objective	Summary of Procedures	UC Berkeley Results	Reference to UCOP Systemwide Recommendations for Phase II
<i>Special Talent Admissions</i>			
<p>Evaluate the operating effectiveness of identified controls over special talent admissions, which, for the purposes of this audit, consist of admitted applicants who received recommendations based on demonstrated ability in fields such as athletics or the arts.</p>	<p>Determined how the campus identifies and tracks applicants that departments recommend on the basis of special talent; gained an understanding of existing documentation and approval requirements for each type of special talent recommendation; and determined whether recommending departments in effect serve as the sole evaluators of the academic qualifications of applicants who they recommend or make admissions decisions for applicants whom they recommend.</p> <p>For a selected sample of special talent admissions, evaluated the sample against existing documentation and approval requirements and assessed whether the source of the documentation supporting the special talent appeared to be legitimate, credible, and supported the special talent.</p>	<p>Our testing included 25 sampled applicants; nine non-athletic applicants and sixteen athletic applicants.</p> <p>The manual process for non-athletic applicants considered for admission as a special talent was not formalized and was not sufficiently and consistently documented (and documentation retained) for all sampled applicants. Of the sampled non-athletic applicants, three were admitted based on special talent; the rest were admitted but not based on special talent.</p> <p>We also noted opportunities to strengthen supporting documentation practices for applicants admitted on the basis of athletic special talent. While the applicant review process entails an independent verification of special talent, evidence of this review and related supporting documentation was not consistently maintained.</p>	<p>C.1 and C.2 address the implementation of controls to identify and track applicants recommended on the basis of special talent and record retention practices for related documentation.</p>

**UNIVERSITY OF CALIFORNIA, BERKELEY
 UNDERGRADUATE ADMISSIONS AUDIT – PHASE II
 ATTACHMENT B -- SUMMARY OF AUDIT PROCEDURES AND RESULTS**

Objective	Summary of Procedures	UC Berkeley Results	Reference to UCOP Systemwide Recommendations for Phase II
<i>Admissions by Exception (AbyE)</i>			
Evaluate the operating effectiveness of identified controls over admissions by exception, including the rationale by which the campus identified a given applicant for consideration under the policy and the evaluation process.	Gained an understanding of the categories of acceptable rationale for admission by exception and existing requirements. For a selected sample of AbyE admissions, assessed the sample against existing documentation and approval requirements.	<p>The Admissions Review Committee and the Student Athlete Admissions Committee, who make most AbyE decisions, do not have formalized charters. In addition, the Office of Admissions (OUA) has not included athletic AbyEs in the campus’ AbyE calculation and reporting.</p> <p>Our testing included 25 sampled applicants; 13 non-athletic applicants and 12 athletic applicants.</p> <p>While all sampled applicants were recorded in SLATE as admitted, the approver was not clearly identified; SLATE records the person entering the information but does not necessarily identify the person or committee making the admission-by-exception decision.</p>	Systemwide Recommendation A.1 addresses formal charters for committees charged with making admissions decisions. Recommendation A.2 addresses retention of documentation supporting admissions decisions. D.3 addresses accurate classification of AbyE admits.
<i>Admissions IT Systems Access</i>			
Evaluate the operating effectiveness of identified	Performed a risk analysis to determine in-scope systems for test work. For in-	As noted in the Phase I – Local Report, a formal access security process,	Systemwide Recommendations E.1

**UNIVERSITY OF CALIFORNIA, BERKELEY
 UNDERGRADUATE ADMISSIONS AUDIT – PHASE II
 ATTACHMENT B -- SUMMARY OF AUDIT PROCEDURES AND RESULTS**

Objective	Summary of Procedures	UC Berkeley Results	Reference to UCOP Systemwide Recommendations for Phase II
<p>controls over access to admissions systems, including basic log-in access to systems, specific levels of access within those systems, and appropriateness of user changes to data.</p>	<p>scope systems, assessed the sufficiency of controls over user access changes and the review activity over authorized user access.</p> <p>For a selected sample of system users, determined whether their access was appropriately authorized and their level of access aligned with job responsibilities.</p>	<p>including a standard systems access request form, had not been implemented. In addition, the quarterly review of user access had not been formalized and did not contain standard criteria, scope, and parameters.</p> <p>Our testing included 25 users with IT access to SLATE. All users had access that was reasonably consistent with their admissions-related job responsibilities, however, we noted opportunities to strengthen user access request documentation to help ensure an appropriate basis for the granting of access and to evidence appropriate management approvals. In addition, we noted that access for users who had not accessed the system for extended periods had not been deleted.</p>	<p>and E.2 address ensuring documentation of IT system access provisioning and ensuring access is aligned with job responsibilities.</p>
<p><i>Student Athlete Participation</i></p>			
<p>Evaluate the effectiveness of identified controls over student athlete participation.</p>	<p>Gained an understanding of existing requirements for minimum student athlete participation; assessed whether existing controls are sufficient to ensure that records supporting ongoing participation in athletics are kept current</p>	<p>We noted opportunities to strengthen review and approval requirements for athletes with limited direct experience (but identified athletic potential) in the sport for which they were being recruited. In addition, while head</p>	<p>Systemwide Recommendation F.1 addresses regular training of athletics staff on the minimum participation policy</p>

UNIVERSITY OF CALIFORNIA, BERKELEY
UNDERGRADUATE ADMISSIONS AUDIT – PHASE II
ATTACHMENT B -- SUMMARY OF AUDIT PROCEDURES AND RESULTS

Objective	Summary of Procedures	UC Berkeley Results	Reference to UCOP Systemwide Recommendations for Phase II
	<p>throughout the season. Assessed the reliability of participation documentation by reviewing controls over the information they contain.</p> <p>For a selected sample of admitted non-scholarship student athletes, assessed associated athletic participation records, including documentation supporting any change in participation status.</p>	<p>coaches were trained in athletic participation requirements, participation documentation was not always completed timely.</p> <p>Our testing included 25 admitted non-scholarship student athletes. Change of Status forms only minimally indicated the reason for the change and generally were not reviewed and approved as required.</p>	<p>requirements and additional controls related to changes in participation status.</p>
<i>Appeals Process</i>			
<p>Evaluate the design of internal controls over the undergraduate admissions appeals process.</p>	<p>Performed a walk-through of the appeals process; reviewed relevant policies and procedures.</p>	<p>The transfer review and selection process is inconsistent among the colleges/schools. The OUA will include transfer appeals in the planned review of colleges/schools admissions practices, as noted in the MAP for the Phase I - Local Report.</p>	<p>Systemwide Recommendation G.1 addresses additional controls for local procedures related to appeals decisions.</p>