

**UNIVERSITY OF CALIFORNIA, SAN FRANCISCO
AUDIT AND ADVISORY SERVICES**

**Graduate Admissions Process
Project #19-095**

September 2019



University of California
San Francisco

Audit & Advisory Services

UCSF Box 0818
1855 Folsom Street
San Francisco, CA 94143

tel: 415.476.3851
fax: 415.476.3326
www.ucsf.edu

September 30, 2019

Hallen Chung, Director of Admissions, School of Medicine
Joel Gonzales, Director of Admissions, School of Pharmacy
Sara Hughes, Associate Dean for Education, School of Dentistry
Julia Hwang, Director of Learning Success Center, School of Dentistry
Cynthia Watchmaker, Associate Dean, School of Pharmacy
Catherine Waters, Associate Dean, School of Nursing
Elizabeth Watkins, Dean and Vice Chancellor Student Academic Affairs
David Wofsy, Associate Dean, School of Medicine

SUBJECT: Graduate Admissions Process Review

Audit and Advisory Services (“A&AS”) conducted a review of the graduate admissions process at UCSF. The purpose of this review was to assess admissions processes and controls implemented by the professional schools and the graduate division.

Our services were performed in accordance with the applicable International Standards for the Professional Practice of Internal Auditing as prescribed by the Institute of Internal Auditors (the “IIA Standards”).

Our review was completed and the preliminary draft report was provided to department management in August 2019 and management provided their final comments and responses in September 2019. The opportunities for improvements have been discussed and agreed upon with department management.

This report is intended solely for the information and internal use of UCSF management and the Ethics, Compliance and Audit Board, and is not intended to be and should not be used by any other person or entity.

Sincerely,

Irene McGlynn, Chief Audit Officer



EXECUTIVE SUMMARY

I. BACKGROUND

In response to recent nationwide issues involving third parties exploiting vulnerabilities in college admissions processes, the University of California took the opportunity to assess its entire undergraduate admissions process to ensure that it has strong controls in place to reduce its exposure to third party interference. Accordingly, the UC Office of Ethics, Compliance and Audit Services performed a system-wide audit of undergraduate admissions. The audit was performed in coordination with the internal audit departments at all undergraduate UC campuses using a common audit program.

UCSF Audit & Advisory Services leveraged the system-wide audit program and selected key aspects of the program to review its graduate admissions processes at UCSF's four professional schools as well as the Graduate Division.

II. AUDIT PURPOSE AND SCOPE

The purpose of this review was to assess the design of controls over graduate admissions at UCSF for the School of Medicine (SOM), School of Dentistry (SOD), School of Nursing (SON), School of Pharmacy (SOP) and the Graduate Division.

The scope of the review included the following areas:

1. System-wide and local policies and procedures for graduate admissions
2. Processes associated with admissions
3. Any non-standard admissions practices and/or ancillary processes feeding into the admissions process
4. Processes to verify information on graduate admissions applications, including academic credentials and achievements outside of the classroom

Procedures performed as part of the assessment included review of applicable policies and procedures; walkthroughs of admissions process with key personnel; and identification of controls in place. The review did not include validation to determine the effectiveness of the internal controls.

Work performed was limited to the specific activities and procedures described above. As such, this report is not intended to, nor can it be relied upon to provide an assessment of compliance beyond those areas specifically reviewed. Fieldwork was completed in July 2019.

III. SUMMARY

While admissions processes slightly vary from School to School, in general, each School does have controls over the admissions process that provides comprehensive review, addresses compliance with policy, and minimizes the risk of admissions fraud. We observed that the Schools and Graduate Division use a holistic approach to assess the applicant's unique attributes and experiences as well as measures of academic achievement. Additionally, admissions committee members are regularly rotated to

reduce the risk of potential influence from long standing committee members. Various methods are in place to reduce bias, including multiple reviewers of the application, random assignment of interviewees, establishment of diversity committees, and education on bias awareness.

The review identified potential opportunities to strengthen these controls in the following areas:

1. Admissions process documentation can be improved by including more detailed procedures and stating practices that are not permitted.
2. Conflict of Interest (COI) disclosure policies and procedures can be expanded to cover all individuals involved in the admissions process.
3. Documentation supporting admissions decisions varies in detail and can be enhanced to sufficiently describe the criteria considered in the application evaluations.
4. The process over data entry and tracking of applicants' ratings is manual and increased automation could enable greater degree of data accuracy and facilitate the decision-making process.
5. Monitoring of system access and user activities logs of the admissions system portal can be improved.
6. Monitoring of undue influence on the admissions process can be strengthened.

Further detail on the opportunities for improvement and recommendations can be found in Section IV of the report.

Additionally, we noted the following good practices that may warrant consideration by the other schools:

1. SON, SOP, and SOD have qualitative criteria built into the screening process that specifically define the attributes the reviewer should consider in their evaluation. SOP explicitly draws out "extenuating circumstances" in their evaluation form. Additionally, SON and SOP categories have subset criteria with clearly defined consideration points embedded within each criteria for scoring that demonstrate the comprehensiveness of the review.
2. SOP has six interviewers meet applicants for six minutes each with scripts provided, making it more structured and thereby creating consistency and reducing unconscious bias that may be present with fewer interviewers. Each interviewer submits an independent review of the applicant.
3. SOD and SOP require members of the Admissions Committee and interviewers to attend a mandatory orientation training session each year to go over the School's admission process. SOM recently implemented in-person/zoom training for all new committee members and student reviewers.
4. SOD requires admissions committee members to complete an annual COI attestation.
5. The Graduate Division TETRAD program requests applicants' recommender(s) to rate applicants in four distinct personal characteristics.

IV. OPPORTUNITIES FOR IMPROVEMENTS

No.	Observation	Risk/Effect	Recommendation
1	<p><i>Admissions process documentation can be improved by including more detailed procedures and stating practices that are not permitted.</i></p> <p>Each School and the Graduate Division has some written admission policy and procedures with varying degrees of details, but they may not all be of sufficient breadth and depth to promote policy adherence and process consistency in the following areas:</p> <ol style="list-style-type: none"> 1. Admission requirements, which are posted online for applicants 2. Admissions by Exception, whether the practice is permitted or not permitted, and the documentation of the exceptional circumstances 3. Application verification process 4. Details of the Admission Committee structure, how members are oriented to the admission policy and procedures, and its authority, including the Alternate List Subcommittee 5. Screening/reader’s training materials 6. Review process, including initial, secondary and/or tertiary processes, and the holistic approach taken, including specific criteria evaluated 7. Denial and Appeal Process 	<p>Lack of well defined, cohesive policy and procedures could cause inconsistent practices or expectations not being met.</p>	<p>The Schools and the Graduate Division should have in place detailed internal standards of operating procedures for all aspects of the application evaluation and admissions process mentioned in the observation where applicable for each school, including explicitly stating practices that are not permitted.</p>

No.	Observation	Risk/Effect	Recommendation
2	<p><i>Conflict of Interest disclosure policies and procedures can be expanded to cover all individuals involved in the admissions process.</i></p> <p>Most of the Schools' and the Graduate Division's COI procedures do not cover all individuals who participate in or influence the review of applications for admission, such as admissions staff who perform outreach activities and external readers.</p> <p>The Schools instruct readers not to review known applicants, and when disclosures are made, procedures are in place to ensure applicants are assigned to other readers. However, most of them do not have formal disclosure or attestation requirements, with the exception of SOD, which requires annual COI attestation via Qualtrics online survey.</p>	<p>Without documented policies and procedures for disclosure and managing COI, there is increased risk of inappropriate influence on admission decisions.</p>	<p>The Schools and the Graduate Division should develop detailed COI procedures for everyone involved in reviewing and making admission decisions that include:</p> <ol style="list-style-type: none"> a. Ensuring that individuals who: <ul style="list-style-type: none"> • Perform outreach should not be the sole decision maker; • Identify a candidate for admission by exception cannot make the final admission decision; and/or • External readers should disclose any affiliation with any higher educational institution for which they are reviewing for transparency and be removed from reviewing applications they have familiarity with. b. Consider formally requiring COI attestation and record keeping for all staff involving in the admission process c. 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

No.	Observation	Risk/Effect	Recommendation
			provide examples of improper influence in the context of admissions.
3	<p><i>Documentation supporting admissions decisions varies in detail and can be enhanced to sufficiently describe the criteria considered in the application evaluations.</i></p> <p>The Schools and the Graduate Division use a holistic approach for evaluation of applicants’ attributes such as academic preparedness, healthcare and research experience, communication skills, strengths, and economic factors. The level of detail supporting application decisions varies, with some Schools having an overall assessment conclusion: either “accept” or “reject”, and they may add in a comment field to support the basis of their decisions without any specific criteria for the assessment defined.</p> <p>We noted that SOD’s, SON’s, and SOP’s screening assessment had specific holistic categories and attributes defined for evaluation.</p>	Maintaining adequate documentation of application evaluations helps to reduce the risk of fraud and serves as a basis to demonstrate adherence to policy requirements, including demonstrating the holistic review process.	<p>a. Policies and procedures should define minimum documentation requirements to demonstrate criteria used in the evaluation of the application, including qualitative factors considered.</p> <p>b. SOM and Graduate Division should consider implementing a similar model to that of the SOD, SON or SOP applicant assessments where specific guidelines for each evaluation criteria are embedded into the screening application as a job-aid for reviewers at the time of the evaluation.</p>
4	<p><i>The process over data entry and tracking of applicants’ ratings is manual and increased automation could enable greater degree of data accuracy and facilitate the decision-making process.</i></p> <p>Admissions Review Committee’s decisions are captured on a spreadsheet and final decisions are entered into the Admission Management Program (AMP) or WebAdmit systems by Admissions staff. The data entry and review process is very manual and some Schools have a second verifier to confirm entry from spreadsheets. Overall, any errors or intention to change decisions for smaller applicant</p>	Lack of controls within the data entry process could impact the accuracy of the decision making process.	If technically feasible, consider implementing an automated upload of the spreadsheets’ final decision into the system to increase efficiency.

No.	Observation	Risk/Effect	Recommendation
	<p>pools would be detected at the oversight committee meetings as multiple members review the applications.</p>		
<p>5</p>	<p><i>Monitoring of system access and user activities logs of the admissions system portal can be improved.</i></p> <p>Access to the Admissions Management System is granted based on job responsibility. Reviewers for some of the programs are assigned read-only access for the specific applicants for their review. Additionally, access to the IT systems is reviewed every admission cycle and updated accordingly.</p> <p>Admissions staff have higher administrative access to the admissions systems but this edit capability is limited to key data such as academic information; final decision and tuition fees cannot be edited. While the AMP system has the capability to record date/time stamp and user making the change, there is no periodic review of user activities.</p>	<p>Lack of annual review of provisioning, de-provisioning, and monitoring of edited admission logs could cause unauthorized access to admissions-related IT systems and may allow inappropriate or unauthorized admissions decisions to go undetected.</p>	<p>The Schools and the Graduate Division should consult with the admission IT system administrator for activity logs to identify any high risk edits that are not currently detected by the admission oversight process for consideration for monitoring and periodic review for appropriateness.</p>
<p>6</p>	<p><i>Monitoring of undue influence on the admissions process can be strengthened.</i></p> <p>Discussions with Admissions personnel 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.</p> <p>To provide additional assurance that admissions decisions are not motivated by concern for financial benefit to the University, the Schools should implement protocols to limit communication between development and admissions.</p>	<p>Admissions decisions maybe motivated by concern for financial benefit to the University, which violates Regents Policy 2202, Policy Barring Development Considerations from Influencing Admissions Decisions.</p>	<p>The Schools and the Graduate Division should consider establishing a formal policy reflecting their current practice on 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.</p>