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Subject: ***Undergraduate Student Admissions – Phase 2***
Report 2020-11

Audit & Management Advisory Services (AMAS) has completed a Phase 2 review of Undergraduate Student Admissions as part of a Systemwide Audit of Undergraduate Admissions, under the direction of the University California Office of the President (UCOP). This report supplements the Systemwide Audit of Undergraduate Admissions – Phase 2, Project No. P20A005 finalized February 12, 2020 by the Office of Ethics, Compliance, and Audit Services (ADDENDUM 1) and is a follow up to AMAS' Phase 1 Undergraduate Student Admissions, Report 2019-60.

Background

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

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

UCSD has a Committee on Admissions that consists of faculty members who manage and set the policy for Admissions to implement operationally. The Committee has delegated the authority to make the final admission decision with the Admission Selection Team, which is comprised of the Associate Vice Chancellor of Enrollment Management, Director of Admissions, Senior Associate Director of Admissions and the Enrollment Management Data Analyst in consultation with Institutional Research.

Arts & Humanities allows applicants to Arts departments[1] to submit a portfolio with samples of their work to support their application. The portfolios are then reviewed and scored by faculty or graduate students specializing in the programs to which the portfolios have been submitted. Portfolios are scored from 1 to 5, with 1 being the best possible score. Those scores are then sent to Admissions for consideration as part of the applicants' holistic review; however the portfolio review does not result in a recommendation for admission to the program. The portfolio score is not given any extra weight over another application component. This process does not meet UCOP's current draft definition of a special talent recommendation which was released during the Phase 2 review. However, because the portfolio score represents an input considered during the admissions decision, we included testing results below in order to remain consistent with best practices regarding local and systemwide admissions processes.

In Fiscal Year 2018-19, UCOP oversaw Phase 1 of the Systemwide Audit of Undergraduate Admissions, which assessed the design of the internal controls over the UCSD admissions process and related processes identified in the Phase 1 audit. This Phase 2 audit assessed the operational effectiveness of controls over the UCSD admissions process and related processes identified in the Phase 1 audit.

Audit Objective, Procedures, and Scope

The objective of our review was to assess the campus adherence to controls over undergraduate admissions and the operating effectiveness of campus policy and controls over undergraduate admissions. Additionally, the objective included identifying any deficiencies in campus controls. In order to achieve our objectives, we performed the following procedures:

- Reviewed systemwide and local policies and procedures for undergraduate admissions;
- Reviewed the Phase 1 Systemwide Audit Report and local report;
- Interviewed Admissions Management to gain an understanding of the admission process for both freshman and transfer admissions from the original application submittal to the admissions decision, and the admissions appeals process;
- Interviewed Athletics Department Management and Compliance to gain an understanding of internal controls and processes and procedures for recruiting student athletes;
- Interviewed Arts & Humanities Management to gain an understanding of the portfolio review and scoring process;
- Completed detailed testing of:
    - Special talent admissions,
    - Admissions by exception,
    - Admissions information technology (IT) systems access, and
    - Student athlete participation; and

[1] Music, Theatre & Dance, and Visual Arts

- Reviewed the Phase 2 Systemwide Audit Report (Addendum 1) and the Recommendations provided by UCOP (Addendum 2) and facilitated the development of the Management Corrective Actions by Admissions and Athletics Department Management per UCOP recommendations (Addendum 2).

The scope of this review included review of applications for undergraduate admission received from Fall 2016 through Spring 2019.

Conclusion

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

Summary of Systemwide and Local Observations and Recommendations

We noted opportunities to enhance local admissions and athletics processes which were consistent with areas identified in the Systemwide Audit of Undergraduate Admissions report. A summary of procedures, UCSD Results and references to UCOP systemwide recommendations for Phase 2 are described in further detail in ADDENDUM 3.

We also noted UCSD-specific opportunities for improvement which were not addressed in the systemwide review. The Arts & Humanities portfolio review process can be improved to promote consistency as well as reduce the risk of fraud in the admissions process. Specifically, Arts & Humanities did not have protocols in place to identify and review any personal relationships which might exist between portfolio reviewers and applicants. Without protocols to mitigate potential conflicts of interest, there was a risk that relationships could impact portfolio scoring.

Additionally, each Arts & Humanities department did not have documented criteria for portfolio scores to justify the skill rating of 1 (superior) to 5 (adequate). Sufficient documentation of criteria for portfolio skills is necessary to establish clear guidance and maintain consistency in the scoring process.

The third local issue dealt with review and update of user access for the Arts & Humanities portfolio review software. Arts & Humanities use SlideRoom (a third party platform) to manage portfolio submission and review. Reviewers only had access to portfolios for which they had been assigned to review. After the admission cycle, portfolios were archived, rendering them inaccessible to reviewers; however, Arts & Humanities did not regularly review user access to the application. Our review noted numerous users with access who had not signed in to the system in a number of years. While these users would not have had access to active portfolio submissions, periodic checks of system access rights of all users are essential to ensure that only authorized individuals have system access and that their level of access is appropriate.

Management corrective actions for each of these items are included at the end of ADDENDUM 2 (Local UCSD Management Corrective Actions).

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

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

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

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ADDENDUM 1: Systemwide Audit of Undergraduate Admissions – Phase 2, Project No. P20A005 Final Audit Report

ADDENDUM 2: Audit of Undergraduate Admissions Management Corrective Actions-UCSD: UCOP Project no. P20A005 and AMAS Report 2020-11

ADDENDUM 3: Summary of Audit Procedures and UCSD Results

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

SYSTEMWIDE AUDIT OF UNDERGRADUATE ADMISSIONS – PHASE 2

Project No. P20A005
February 2020

University of California
Ethics, Compliance and Audit Services
Systemwide Audit of Undergraduate Admissions – Phase 2

Table of Contents

I. Executive Summary

Introduction

In response to nationwide issues involving third-party exploitation of vulnerabilities in college admissions processes, particularly those related to athletics, the University of California (UC) took the opportunity to assess not only its controls over athletic admissions, but its entire admissions process to ensure that it has strong controls in place to reduce its exposure to such third party interference. Accordingly, in fiscal year 2018-19, the UC systemwide Office of Ethics, Compliance and Audit Services (ECAS) amended its fiscal year 2018-19 audit plan to perform a systemwide audit of undergraduate admissions (Phase 1 Audit). The Phase 1 Audit assessed the design of controls over the admissions process and related processes. ECAS coordinated execution of the Phase 1 Audit with the internal audit departments at all UC undergraduate campuses and issued the final report for the Phase 1 Audit on June 20, 2019.

In accordance with the fiscal year 2019-20 University of California (UC) audit plan, the systemwide Office of Ethics, Compliance and Audit Services (ECAS) then oversaw the second phase of the systemwide audit of undergraduate admissions (Phase 2 Audit). Similar to the fiscal year 2018-19 audit, ECAS coordinated execution of this Phase 2 Audit with the internal audit departments at all UC undergraduate campuses using a common systemwide audit program. Building on the foundation of the Phase 1 Audit, this Phase 2 Audit assessed the operational effectiveness of controls identified in the first audit.

ECAS developed this summary report for the Phase 2 Audit based on information gathered by each location's internal audit department, and it provides a consolidation of the systemwide findings and a set of systemwide recommendations. Each campus's internal audit department will issue a separate report addressing its local observations and associated planned management corrective actions, as well as management corrective actions to address each of the systemwide recommendations identified in this report.

Objectives and Scope

The overall objectives of the Phase 2 Audit were to assess campuses' 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 those controls.

The scope of the Phase 2 Audit included a review of the operating effectiveness of controls in the following areas:

- Application verification process
- Special Talent Admissions
- Admissions by Exception
- Admissions IT systems access
- Student athlete participation

The audit also reviewed the design of controls over admissions appeals.

Additionally, as part of this review, we attempted to determine the demographic characteristics of admitted applicants who received recommendations based on special talent (Special Talent Admissions) and those admitted and enrolled under the Admissions by Exception Policy. We were able to perform this analysis for Admissions by Exception (see Section IV), but not for Special Talent Admissions due to a lack of available data.

Internal audit departments at each of the nine UC campuses with undergraduate programs and at the Office of the President conducted procedures using a common audit program that ECAS developed for this review. These procedures addressed the evaluation and testing of controls pertaining to undergraduate admissions applications received from Fall 2016 through Spring 2019. ECAS coordinated this audit and oversaw the work that the campus internal audit departments performed. After completing their work, the local internal audit departments summarized the results of their audit procedures and provided these results to ECAS for the development of this report. ECAS then reviewed this information and requested clarification and additional information when necessary. Refer to Appendix 1 for a table outlining the specific audit objectives for the Phase 2 Audit and a summary of the audit procedures performed for each objective.

The observations that we list in this report represent systemwide issues or any issues that did not arise from specific local conditions. Each campus will issue a separate audit report that addresses these systemwide issues as well as any specific local issues not already addressed in this report. For each systemwide and local recommendation, the campuses will identify management corrective actions with assigned target dates. ECAS will review the campuses' management corrective actions to ensure that they appropriately address the systemwide recommendations. Ultimately, the campus internal audit departments, with oversight from ECAS, will track these management corrective actions to ensure completion.

Overall Conclusion

In this report, we identify significant issues regarding recordkeeping for admissions, particularly related to admitted applicants who received recommendations based on special talent. During our preliminary assessment to determine the availability of data, we found that campuses were unable to readily provide the full population of Special Talent Admissions because they do not systematically identify and track them in a centralized campus system. As a result, we were not able to report the number of admitted applicants who received recommendations based on special talent, nor were we able to complete the portion of our audit scope relating to analysis of the demographic characteristics of these students.

Although we were able to acquire and analyze data on Admissions by Exception, we found recordkeeping issues that affected the reliability of this data. Implementation of the recommendations from the prior Phase 1 Audit and this Phase 2 Audit should reduce these issues.

Our evaluation of internal controls over admissions found that several opportunities exist to strengthen these controls and supplement them with additional controls to further reduce the risk of admissions fraud in the following areas:

- Documenting admissions decisions
- Verifying application information
- Special Talent Admissions
- Admissions by Exception
- Admissions IT system access
- Monitoring student athletes' participation in athletic programs
- Admissions appeal processes

A large portion of the issues we identify in this report will be addressed by the Phase 1 Audit recommendations (Appendix 2) that the campuses are currently working to implement. In this report, we have included additional recommendations to supplement these Phase 1 Audit recommendations, which we have included in each section along with our current (Phase 2 Audit) recommendations.

II. Background

Overview of the University of California Admissions Process

In the most recent admissions cycle, the nine UC undergraduate campuses collectively processed over 840,000 applications for admission.[1] These campuses vary significantly with respect to the specific details of the processes that they use to evaluate applications for undergraduate admission. Notwithstanding these differences, the campuses' processes share a similar overall sequence of events. Applicants begin the process by applying to one or more UC campuses through the University's "My UC Application" website. The systemwide Department of Undergraduate Admissions (Systemwide Undergraduate Admissions) then distributes applicants' information to the respective campuses to which they have applied for admission. During the application submission period, trained readers at campus admissions offices begin to review and evaluate applications using the comprehensive review process, which we describe later in this report. As a result of their comprehensive reviews of applications, campus admissions offices assign an evaluation to each application.

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

Role of the Academic Senate

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

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

[1] According to Systemwide Undergraduate Admissions, UC undergraduate campuses collectively received 844,017 applications for Fall 2019 freshman and transfer undergraduate admission. Prospective students may apply to multiple campuses and this figure reflects each campus application for each applicant.

Admissions Requirements

The admissions requirements for UC are the minimum academic standards that a student generally must attain to be considered for admission. However, meeting the minimum standards does not guarantee admission. Specific minimum qualifications for freshman applicants include A-G subject requirements (see Appendix 3), examination requirements (SAT with Essay or ACT with Writing scores), and a minimum GPA of 3.0 for California residents and 3.4 for non-residents. Applicants who do not meet UC's minimum requirements may be considered if they score high on the ACT with Writing or the SAT and two SAT subject tests. UC also requires applicants to be proficient in the English language.

Comprehensive Review

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

BOARS developed guidelines for selection criteria under comprehensive review, including factors that campuses may consider as part of the review process for freshman and transfer admissions. Specifically, BOARS suggests 14 factors for consideration of freshman applicants, including six non-academic and eight academic factors, as shown in the table to the right. For transfer applicants, the BOARS guidance recommends consideration of nine factors that consist of four non-academic

Comprehensive Review Factors for Freshman Applicants

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

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

and five academic factors, three of which involve transfer-specific admissions requirements. See Appendix 4 for further detail on each of the comprehensive review factors that campuses consider for freshman and transfer applicants.

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

Eligibility in the Local Context

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

Admissions by Exception

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

Application Verification Process

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

Separately, in conjunction with the adoption of the University's comprehensive review policy for admissions, in 2002 Systemwide Undergraduate Admissions began verifying the academic and non-academic achievements of a limited sample of applicants through the use of a third-party contractor. Multiple parts of the admission application are subject to random verification: non A-G coursework (freshman only), honors and awards, extracurricular activities, volunteer work and community service, special program participation, employment, and information contained in the personal insight question responses. The University provides notice in the application that information may be verified, including in the affidavit and electronic signature required for submission. For all applicants selected for verification, the contractor requests that they submit an Application Verification Form along with documentation to support the requested item. The contractor then reviews the submitted documentation to confirm that it appropriately supports the selected item.

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

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

Special Talent Admissions

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

Admissions Appeal Process

Each campus has implemented processes for freshman and transfer applicants to appeal admissions decisions. Generally, a student must demonstrate new and compelling information or extenuating circumstances for an appeal to be considered. Although the exact appeal procedure

differs by campus, an appeal typically requires the applicant to describe the information or special circumstance and if applicable, submit any additional documentation. Examples of compelling situations include errors in the application, newly documented medical issues, and extraordinary achievement or special recognition since the original application.

Appeals could address circumstances other than admissions decisions, such as late applications, late intent to register, or rescinded provisional admission offers. The review and approval authorities vary by campus, although a number of campuses have established appeals committees. In many cases, the campus admissions director makes final determinations on appeals decisions.

III. Opportunities for Improvement and Recommendations

A. Documentation of Admissions Decisions

Clear and complete documentation of local admissions policies, procedures, and decisions is necessary to establish clear guidance, maintain consistency in the admissions process, and reduce the risk of fraud. The Phase 1 Audit identified issues with insufficient local admission policies and procedures as well as deficiencies in the documentation supporting admissions review results and decisions.

In sample testing as part of the Phase 2 Audit, we identified issues with documentation of admissions decisions. Most campuses either did not sufficiently document or did not retain their admissions decision approvals in accordance with the systemwide records retention schedule.[2] Additionally, some locations found that admissions offices did not document approvals in a consistent manner. For example, one campus observed that it used multiple systems to document admissions decisions, while another observed that it documented approvals for Special Talent Admissions recommendations in emails rather than in a centralized campus system.

Several campuses have established committees that are charged with making certain admissions decisions. We observed in our Phase 2 Audit that these committees often lacked adequate foundational documents that outlined their charge, composition, and review and approval process. For example, one campus established a committee that makes final decisions on applicants' provisional admissions when they have not met their conditions for admission. However, this committee lacked formal documentation such as a charter outlining its structure, charge, review criteria, and decision process. Campuses would benefit from establishing and maintaining sufficient documentation for admissions committees to ensure that their purpose, membership, and processes are clear, and that their decisions are appropriately memorialized.

Prior recommendations (from Phase 1 Audit dated June 20, 2019):

Campuses should:

1.1 Document any local policies and develop detailed procedures for all aspects of the application evaluation and admissions process, to include the following:

- *Criteria used to evaluate applications, including any qualitative factors considered, consistent with comprehensive review*
- *Minimum documentation requirements to demonstrate application of criteria in the evaluation results*
- *For freshman application evaluations that consider qualitative factors, a requirement that at least two independent documented evaluations support a decision to admit*

[2] The UC Records Retention Schedule requires that admissions records be retained for five years after their administrative use for matriculated students and one year after their administrative use for all other applicants.

1.2 Document all admissions decisions with sufficient detail to:

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

Current Recommendations*:*

The following are additional recommendations to address the issues noted in the current Phase 2 Audit:

Campuses should:

A.1 Ensure that any committee charged with making admissions decisions develop a charter that includes, at a minimum, the committee's:

- 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

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.

B. Application Verification Process

As discussed earlier in this report, Systemwide Undergraduate Admissions performs an annual verification of academic and non-academic achievements of a limited sample of applicants through the use of a third-party contractor. We selected a random sample of 25 of the 2,000 verifications performed during the audit period and tested them as well as all 21 permanent excusals that Systemwide Undergraduate Admissions approved during the audit period. We necessarily limited our testing to applications for Fall 2018 through Fall 2019 because Systemwide Undergraduate Admissions no longer has access to the files for previous application terms since it changed contractors. Our testing identified the need for improvement in the process given that we found insufficient documentation, lack of reviewer follow-up, missing verification forms, verification of incorrect items, and missed opportunities to request alternate documentation.

Insufficient Verification Documentation

We identified some sample items that lacked sufficient documentation, which indicates that the verification contractor's performance requires improvement. Specifically, we observed that items

were missing, incomplete, or lacked characteristics demonstrating authenticity. For example, one applicant provided a computer printout of her competition history for an equestrian association, but the document lacked any authenticating characteristics, such as a seal, statement on letterhead, or signature of an association official. A different applicant indicated that she could provide additional documentation at a later date, yet the verification contractor accepted her initial incomplete documentation as sufficient for verification. For each submission that it reviews, the verification contractor must consider whether the documentation that the applicant provided fully substantiates the requested item. We discussed these items with Systemwide Undergraduate Admissions, which stated that it has at times informally tested a sample of application verification submissions accepted by its contractor to ensure quality control, and noted that the contractor is now more experienced.

Concerns with Permanent Excusals

An applicant may be permanently excused from the verification process if they provide an acceptable explanation for their inability to obtain documentation for an item. We identified concerns with the majority of permanent excusals tested, which included lack of reviewer follow-up, missing Application Verification Forms, excusals based on verification of incorrect items, and instances in which verification of other items could have been requested. Systemwide Undergraduate Admissions explained that its verification contractor may have approved some excusals without its knowledge, but Systemwide Undergraduate Admissions has recently revised its procedures to clarify that it is the only party that may authorize excusals.

Lack of Reviewer Follow-up

We noted that reviewers did not follow up on nearly half of the permanent excusals tested even though they could have done so. For example, for three applicants who requested deadline extensions to provide the requested documentation, reviewers granted them permanent excusals despite applicants' indications that they could later provide the documentation. Two of these applicants did request extensions until later than Systemwide Undergraduate Admissions generally allows, but reviewers excused them without documentation of either the requested items or the need for extensions.

Missing Verification Forms

We found several instances of applicants not providing the requested Application Verification Form along with their supporting documentation, most of which were excusals. Although this form is not critical for applicants who respond by submitting the requested documentation, it is necessary for applicants who request extensions to the submission deadline or indicate that they are unable to provide the requested documentation, and thus seek excusals, because the form documents their explanations. Systemwide Undergraduate Admissions explained that this form is now electronic and its system requires applicants to submit it as part of their response.

Incorrect Items Verified

We identified two excusals that reviewers granted despite applicants' submission of documentation for application items unrelated to the items being verified. One of these cases involved an applicant whom Systemwide Undergraduate Admissions asked to verify his award in

a science competition but instead provided documentation of his completion of a musical training course. Systemwide Undergraduate Admissions suggested that it may have requested that the applicant verify a different item if he was unable to verify the item that it originally requested, but if so, did not document this request, nor did it document that the applicant indicated sensitive or highly personal related circumstances, as specified in the Verification Guidelines.

Documentation of Different Items Not Requested

We noted that reviewers granted two excusals for items for which applicants stated they could not provide documentation without following up or requesting documentation of different items. Although not required at the time by Systemwide Undergraduate Admissions' procedures, reviewers could have requested that these applicants document different items.

Prior recommendations (from Phase 1 Audit dated June 20, 2019):

Systemwide Undergraduate Admissions should:

2.1 Document the methodology used to determine the sample size for the annual verification process and annually reassess the sample size based on the current size of the applicant population.

2.2 Perform a risk analysis to determine the relative risk of falsification for each application section and, where present, increase the number of sample items that it selects from each application section according to the risk of falsification as determined by this analysis. As part of this analysis, consider the rate of nonresponse for each category in addition to the rate of identified falsification.

2.3 Develop formal requirements that it must follow for granting and approving permanent excusals from the verification process, including:

- *Required follow-up steps when an applicant reports that they are unable to provide supporting documentation for an item being verified, including a requirement to seek alternate documentation such as personal statements from third parties*
- *A requirement to document its analysis and rationale for granting a permanent excusal*
- *Approval requirements for permanent excusals*

Current Recommendations:

The following are additional recommendations to address the issues noted in the current Phase 2 Audit:

Systemwide Undergraduate Admissions should:

B.1 Ensure adherence to its retention requirements and internal verification guidelines, which describe acceptable forms of documentation, by annually testing a sample of applicant verification submissions approved by its contractor.

B.2 Enhance its internal verification guidelines and applicant instructions (as applicable) to include:

- A requirement that reviewers follow up with applicants to obtain requested documentation, particularly when applicants have requested a reasonable deadline extension or indicated that they can at least partially document an item, unless an applicant indicates sensitive or highly personal related circumstances, as specified in the Verification Guidelines. If the applicant cannot provide the requested documentation, the reviewer should document the reason that the applicant was unable to provide it.
- For applicants who request extensions beyond an acceptable date or indicate that they cannot provide the requested documentation, a requirement that Systemwide Undergraduate Admissions select a different item.
- Requirements that Systemwide Undergraduate Admissions will be the sole authorizing party for all verification excusal decisions and will document both the rationale for and the individuals who authorize each excusal.
- Specific excusal decision requirements, such as the minimum number and position titles of Systemwide Undergraduate Admissions staff authorized to approve excusals.

B.3 Update its procedures and, if necessary, its contract with the third party to align application verification documentation retention requirements with the UC Records Retention Schedule.

C. Special Talent Admissions

As part of the comprehensive review process, campus admissions offices consider recommendations from campus units or individuals that are based on special talent, such as in athletics or the arts, which we have termed as Special Talent Admissions. These recommendations may come in the form of lists of prospective student athletes or summary scores of talent-based portfolios that a department reviews.

As we will note in this report's Data Analysis section, our Phase 2 Audit work identified fundamental issues with the campuses' tracking of Special Talent Admissions. During our preliminary planning for our admissions data analysis procedures, all of the campuses reported that they do not systematically identify and track candidates for Special Talent Admissions in a centralized campus system, with the exception of recommendations from their athletics departments. The campuses therefore are not able to identify the full population of Special Talent Admissions, nor are they able to readily access basic data on these admissions. This condition makes it very difficult for the University to accurately report to stakeholders the number and composition of Special Talent Admissions, and made it infeasible for us to conduct this analysis as part of this audit. Additionally, we were unable to obtain the full population of Special Talent Admissions for our sample selection for the Phase 2 Audit.

In our Phase 1 Audit, we observed that the documentation supporting Special Talent Admissions recommendations is not always sufficient to ensure that the special talent is verified and legitimate. Our Phase 2 Audit work further confirmed previously identified issues regarding the adequacy of documentation supporting Special Talent Admissions recommendations. In our

sample testing, all campuses identified issues with the adequacy of documentation substantiating the special talent for which these recommendations were made. Some campuses found that these issues were isolated to certain departments that make recommendations. For example, two campuses noted that documentation of special talent in music typically consists of audition sign-in sheets and audit score sheets completed by attending faculty judges. However, according to management in these music departments, they did not retain these documents.

All campuses that had existing approval requirements for special talent recommendations identified issues with the adequacy of the approval records — either that they were never documented, not documented in a consistent manner, or not retained.

Prior recommendations (from Phase 1 Audit dated June 20, 2019):

Systemwide Undergraduate Admissions should:

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

Campuses should:

3.2 Clearly identify and track all applicants that departments recommend on the basis of special talent.

3.3 Establish and document the minimum requirements for documented verification of special talent for each department. These minimum requirements should identify the types of information and trusted sources that can be used to confirm qualifications or credentials for a specific sport or talent. Requirements for documented verification of athletic qualifications could be limited to non-scholarship prospective student athletes.

3.4 Require a two-step verification process for any recommendation for admission on the basis of special talent that includes the following:

- *The initiator of the recommendation must document and attest, under penalty of disciplinary action, that they have performed an assessment and determined that the level of special talent warrants a recommendation for admission*
- *An individual in a supervisory capacity must approve the recommendation*

For athletics, this process could be limited to non-scholarship prospective student athletes.

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

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

Current Recommendations:

The following are additional recommendations to address the issues noted in the current Phase 2 Audit:

Campuses should:

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.

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.

D. Admissions by Exception

As discussed earlier in this report, Admissions by Exception is the policy under which a campus may admit applicants who do not meet minimum UC requirements for admission but demonstrate high potential for academic success and leadership. Specifically, in July 1996 the Regents issued Policy 2105: Policy on Undergraduate Admissions by Exception. This Regental policy describes the general purpose of Admissions by Exception but does not include specific characteristics to consider. In Standing Order 105.2, the Regents delegated to the Academic Senate the authority to determine conditions for admission, subject to approval by the Board of Regents. Accordingly, in 2005 the Board of Admissions and Relations with Schools (BOARS) prepared a guidance document entitled "Guidelines for Implementation of University Policy on Admission by Exception" that outlines five principles for Admissions by Exception and six recommended categories of applicants to consider for Admissions by Exception.

Admissions by Exception Limits

Regents policy specifies that the proportion of students that campuses admit by exception be limited to six percent of enrollment for both freshman and transfer students. Within the six percent allotment, up to four percent of the enrolled applicants can be from disadvantaged students, who are those from low socioeconomic backgrounds or who have experienced limited educational opportunities, and up to two percent from other students. The 2005 BOARS guidance further specified the recommended categories to consider for Admission by Exception, however, we noted that the criteria within these recommended categories appears to be contradictory. For example, the BOARS guidance states that the two percent category of Admissions by Exception reserved for "other students" in the Regental policy is intended to include veterans, adults, and students with disabilities, yet the guidance document includes these criteria as part of the "disadvantaged" category subject to the four percent limit. These policy and guidance documents for Admissions by Exception should be consistent so that the campuses have comprehensive guidance that lists and defines Admissions by Exception categories and their applicable percentage limits.

Accuracy of Classification

Our Phase 2 Audit noted that some campuses incorrectly coded the Admission by Exception status for certain applicants, either at the general indicator or subcategory (e.g., disadvantaged, other) level. For example, one campus did not identify recruited athletes who did not meet minimum eligibility requirements as admitted by exception and thus did not include them in its Admissions by Exception rate calculations. The number of athletes that this campus admitted by exception was low and therefore this error did not materially affect its percentage of Admissions by Exception. Another campus listed the veteran Admission by Exception code for several students whom documentation showed were Reserve Officer Training Corps (ROTC) participants. Given that the campuses must monitor and limit the number of students that they admit by exception, they should have controls in place to ensure that they accurately categorize and code all such students.

Rationale and Approval

In our Phase 1 Audit, we observed that not all campuses explicitly document the exceptional characteristics that led them to admit applicants by exception and campuses do not always have someone review and approve Admission by Exception candidates other than the individuals who identified them. As further detailed in the data analysis section (section IV) of this report, our Phase 2 Audit found that campuses do not systematically capture the rationale for Admissions by Exception in consistent subcategories. We noted that most campuses identified issues with the adequacy or consistency of documented rationale for Admissions by Exception. In these cases, documentation to support Admission by Exception decisions was either not available or inconsistent with the BOARS guidelines, or Admission by Exception codes were too general to identify exception reasons.

We further noted that most campuses' documented approval for Admission by Exception decisions was inadequate or missing for all or some of the applications reviewed. For example, one campus noted that there was no clear documentation or indication within its admissions system to identify who recommended or approved the designation, and furthermore, the campus lacked local guidelines to identify individuals responsible for recommending and approving Admissions by Exception.

Compliance with Assembly Bill 1383

In October 2019, the California Legislature enacted Assembly Bill (AB) 1383, which requires that each student admitted to the University of California by exception be approved by a minimum of three senior campus administrators. Further, the campus must document those involved in the evaluation of student applications for those admitted by exception and establish a policy that applies articulated standards to the campus' Admissions by Exception decisions. AB 1383 also requires that student athletes admitted by exception participate in their athletic program for a minimum of one academic year. Accordingly, Systemwide Undergraduate Admissions is developing campus guidance to facilitate compliance for the 2021-22 academic year.

Prior recommendations (from Phase 1 Audit dated June 20, 2019):

Systemwide Undergraduate Admissions should:

4.1 Develop and issue guidance for measuring Admissions by Exception rates to ensure that campuses are measuring them consistently.

Campuses should:

4.2 Establish a local campus policy that outlines acceptable rationale and the required evaluation process for Admissions by Exception. At a minimum, this policy should ensure that an individual who identifies a candidate for Admission by Exception cannot make the final admission decision.

4.3 Establish controls to ensure that an acceptable rationale for identifying an applicant to be considered for Admission by Exception is documented for each applicant being considered under the policy.

4.4 Establish local procedures to annually monitor compliance with the campus percentage limits for Admissions by Exception established by Regental policy.

Current Recommendations:

The following are additional recommendations to address the issues noted in the current Phase 2 Audit:

Systemwide Undergraduate Admissions should:

D.1 In coordination with BOARS:
- Develop and issue guidance clarifying the characteristics of "disadvantaged students" as defined by Regents Policy 2105.
- Define a standardized set of categories to be included as part of the "other students" category specified in Regents Policy 2105.

D.2 Develop and issue guidance to ensure campuses have consistent policies and procedures to comply with AB 1383. The guidance, at a minimum, should include the following for all Admissions by Exception:
- Establishment of a policy that applies articulated standards for Admissions by Exception decisions, including minimum procedural requirements and an explanation for choosing the standards that supports their application as fair and appropriate
- Documentation of employees involved in the evaluation of applications for Admissions by Exception
- Approval by a minimum of three senior campus administrators
- Definition of senior campus administrator
- For Admissions by Exception into athletic programs, establish a policy requiring student program participation for a minimum of one academic year

Campuses should:

D.3 Implement controls to ensure accurate classification of Admissions by Exception for all students that campuses admit and enroll under the policy, including identifying and tracking of student athletes and those designated as "disadvantaged" or "other."

E. Admissions IT System Access

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

In our Phase 1 Audit, we observed that several campuses did not periodically review IT system access rights to verify that they appropriately aligned with users' job responsibilities. We also observed that a number of campuses did not monitor user activity on admissions IT systems.

Our Phase 2 Audit work confirmed the process deficiencies observed in the Phase 1 Audit. Most campuses found that their admissions offices did not regularly review IT system access or retain documentation to evidence periodic review. In our sample testing of user access, most campuses also found a lack of documentation demonstrating that their admissions offices appropriately authorized user access. Several campuses identified system users that still had access after their job responsibilities had been discontinued, while others identified users with access rights inconsistent with their job responsibilities. For example, one campus identified users with edit access privileges when their job responsibilities only required them to have read access. In some cases, we observed that campuses had compensating controls that served to mitigate the risk of unauthorized access to the system, such as removal of general system access through central authentication services.

Prior recommendations (from Phase 1 Audit dated June 20, 2019):

Campuses should:

6.1 Implement controls to periodically review admissions IT system access to ensure that the level of access is aligned with job responsibilities including, at a minimum, a review of user access before each annual admissions cycle begins.

6.2 Implement controls to log activity in admissions IT systems and periodically review high-risk changes, such as admissions decision changes, for appropriateness. Campuses should define high-risk changes to review and monitor.

Current Recommendations:

The following are additional recommendations to address the issues noted in the current Phase 2 Audit:

Campuses should:

E.1 Update admissions IT system user access to ensure that access is appropriately aligned with job responsibilities.

E.2 Document admissions IT system access provisioning processes to ensure that access is only provided to authorized individuals and that access rights are consistent with users' roles and responsibilities. At a minimum, these procedures should require:

- Documented justification and authorization for user access to admissions IT systems
- Maintenance of a list of authorized users and associated privileges

F. Monitoring Student Athletes' Participation in Athletics Programs

In our Phase 1 Audit walkthroughs, we observed that only two campuses had established minimum participation requirements for student athletes in athletics programs. Consequently, we recommended additional protocols to ensure that student athletes participate in the athletics programs for which they were recruited. These additional controls will help mitigate the risk of fraudulent admissions based on falsified athletics profiles or bribery of athletics officials and help to ensure the legitimacy of the athletic qualifications that campuses consider in admissions decisions.

In our Phase 2 Audit, we noted that many campuses' participation records for student athletes were inadequate or not always current. For example, two campuses noted that they have systems that track practice logs at the team level and as such lack individual participation records. Another campus identified a student who remained listed on the participation records a month after leaving the team. To ensure the legitimacy of athletics admissions, each campus should ensure that effective controls are in place to accurately record ongoing active participation in athletics programs and monitor each recruited student athlete's participation status.

We also noted that a number of campuses did not maintain adequate documentation to support changes in athletics participation status. For example, although at one campus coaches complete status forms when athletes leave their sport, coaches minimally indicate the reasons for status changes (e.g., quit, dismissed, transferred, etc.) and the Athletics Compliance Director does not consistently approve these forms.

The admissions process at one campus includes reserving a limited number of spaces (slots) for athletes. This campus reserves athletics slots 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. Further, the campus intends for these slots to be used for applicants who are Division I-caliber student athletes. Intercollegiate Athletics at this campus usually reserves these slots for applicants who have not been accepted during the regular admissions process. During the Phase 2 Audit, this campus identified an athlete who was

admitted by slot but whose name did not appear on a team roster. Accordingly, the campus referred this situation for investigation.

Without proper controls over the integrity of active rosters, the quality of monitoring protocols based on this information will be compromised. To identify cases of possible fraudulent admission, each campus should ensure that effective controls are in place to record ongoing active participation in athletics programs and monitor each recruited student athlete's participation status.

Prior recommendations (from Phase 1 Audit dated June 20, 2019):

Campuses should:

9.1 Establish a policy requiring a minimum of one year of participation in an athletic program for non-scholarship student athletes recommended for admission by the athletics department. This policy should include:

- *Any exceptions to this requirement*
- *Approval requirements for any exceptions to the policy*
- *Consequences for violating the policy*

9.2 As a condition of admission, require non-scholarship athletes recommended for admission to sign an agreement that they will comply with the minimum participation requirement, subject to the consequences established in the policy.

9.3 Establish controls to ensure records supporting ongoing participation in athletics are kept current throughout the season.

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

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

Current Recommendations:

The following are additional recommendations to address the issues noted in the current Phase 2 Audit:

Campuses should:

F.1 Implement controls, such as required forms, to ensure that reasons for changes in athletics program participation status are clearly documented.

G. Admissions Appeals Processes

Each campus has implemented its own admissions appeals processes. As previously indicated, appeals could address circumstances other than admissions decisions, such as late applications, late intention to register, or rescinded provisional admission offers. Generally, students must demonstrate new and compelling information or extenuating circumstances for appeals to be considered. Specific campus requirements for admissions appeals are listed on their respective websites.

In our Phase 2 Audit, we observed that campus appeals processes would benefit from increased controls. Although they vary by campus, we noted that most campuses have written policies or procedures for appeals, and some campuses have established committees to review appeals and recommend appeals decisions. At most campuses admissions directors makes final appeals decisions in response to recommendations from either established committees or reviewers.

We noted that several campuses do not always document appeals decisions with appropriate justification or do not specify in their documentation the individuals involved in appeals processes. To ensure that appeals decisions are justified and compliant with campus requirements, campuses should support all appeals decisions with sufficient documentation. Accordingly, documentation should identify the individuals involved in appeal reviews, the initial appeal recommendations, and the rationale for appeal decisions.

During the Phase 2 Audit, one campus received a whistleblower complaint regarding alleged anomalies in the campus admissions appeals process and referred it for investigation. The recommendations below reflect consideration of the internal control issues observed within that campus's admissions appeals process.

<u>Current Recommendations:</u>

The following are recommendations to address the issues noted in the current Phase 2 Audit:

Campuses should:

G.1 Develop or amend local policies and procedures to address requirements for all appeals decisions. The policies and procedures should include the following:

- A requirement that all appeal reviews be fully documented, including analyses, recommendations, decisions, and individuals involved.
- 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.

IV. Data Analysis

The objective of our data analysis was to determine the demographic characteristics of applicants admitted under Special Talent Admissions and Admissions by Exception through the use of summary statistics based on application data for the Fall 2017 through Winter 2020[3] terms.

Data Availability

To determine the extent of the data analysis that we could perform, we surveyed the campuses to identify the data that they had available for Admissions by Exception and Special Talent Admissions.

Admissions by Exception

Through our data survey we found that the campuses were able to provide a general indicator of whether applicants were admitted by exception, which allowed us to perform certain analyses on that population. However, we learned that subcategory indicators, such as "disadvantaged" and "other," were either generally unavailable or only available at a few campuses, and therefore we were unable to perform analyses based on these subcategories.

Special Talent Admissions

We attempted to collect data to analyze Special Talent Admissions. However, as noted earlier in this report, during our preliminary data analysis planning, all of the campuses reported that they do not systematically identify and track candidates for Special Talent Admissions in a centralized campus system, with the exception of recommendations from their athletics departments. Further, the University as a whole did not yet have a common definition of this characteristic. Therefore, we could not perform analysis on Special Talent Admissions.

Reliability of Admissions by Exception Data

Although the campuses provided data that allowed us to perform certain analyses of Admissions by Exception, we observed the following issues regarding the reliability of the data.

In our Phase 2 Audit work, we noted inaccuracies in the Admission by Exception data provided by some campuses. As discussed earlier in this report, these campuses identified applicants whose Admission by Exception status was incorrectly coded and another campus found that certain academically ineligible applicants were not reported as Admissions by Exception.

As part of our analysis, we compared the number of enrolled students admitted by exception at each campus to the numbers that they previously provided to Systemwide Undergraduate Admissions for Fall 2017 and Fall 2018. As a result, we identified discrepancies at a few campuses, which they were generally able to explain. For some campuses, these differences were due to deficiencies in their previous approach to providing the information to Systemwide Undergraduate Admissions, suggesting that these campuses may not have had a reliable method of identifying Admissions by Exception.

[3] Data for admission to the Fall 2017 through Winter 2020 terms. A relatively small number of applicants for the Winter 2020 and Spring 2020 terms are not included because some campuses were still considering certain applications for admission to those terms at the time that they provided the data.

Comparison of Admissions by Exception to the General Admitted Population

We present our overall analysis of the characteristics of admitted applicants and enrolled students in Table 1 below. This table organizes the results according to three distinct populations: all admitted applicants, admitted applicants who ultimately enrolled, and enrolled students whom campuses admitted by exception.

Table 1. Characteristics of Admitted Applicants, Enrolled Students, and Enrolled Students Admitted by Exception – Fall 2017 through Winter 2020

		Admission Status					
		Admitted		Enrolled		AxE* Enrolled	
Residency	California	622,223	72%	165,676	81%	1,582	46%
	Other US State	91,922	11%	11,498	6%	513	15%
	International	145,093	17%	27,176	13%	1,314	39%
	Total	859,238	100%	204,350	100%	3,409	100%
Race/Ethnicity[4]	African-American/Black	33,316	4%	8,724	4%	301	9%
	Asian	272,604	32%	64,539	32%	486	14%
	Latino	191,523	22%	52,237	26%	483	14%
	Native American	3,966	<1%	1,015	<1%	24	<1%
	Pacific Islander	1,968	<1%	508	<1%	18	<1%
	Caucasian/White	184,827	22%	44,855	22%	713	21%
	International[5]	145,093	17%	27,176	13%	1,314	39%
	Domestic Unknown	25,941	3%	5,296	3%	70	2%
	Total	859,238	100%	204,350	100%	3,409	100%
Athlete Status	Recruited Athletes	4,449	1%	3,652	2%	685	20%
	Other Students	750,056	87%	184,453	90%	1,725	51%
	Could Not Determine[6]	104,733	12%	16,245	8%	999	29%
	Total	859,238	100%	204,350	100%	3,409	100%
Income[7]	Mean	$149,372		$129,122		$180,417	
	Median	$96,511		$80,000		$102,072	
	Median Per Family Member[8]	$25,000		$20,667		$30,000	

Individual percentages may not add to 100% due to rounding.

*Admitted by exception

[4] We combined certain racial and ethnic identities to simplify our analysis. Specifically, Asian consists of Chinese/Chinese-American, East Indian/Pakistani, Filipino/Filipino-American, Japanese/Japanese-American, Korean, other Asian, and Vietnamese, and Latino consists of Mexican/Mexican-American/Chicano and other Spanish-American/Latino.

[5] The United States Department of Education requires international students to be reported as nonresident aliens, and therefore their racial or ethnic identity is indicated as "international" in University data.

[6] One campus did not systematically identify and track which admitted students were recruited athletes.

[7] The application for admission requests that applicants voluntarily report their household income. To avoid artificially reducing mean and median income results, we excluded records with zero income (approximately 1% of records) since it appears unlikely that entire households would be without income, such as public benefits.

[8] We excluded records with zero income and zero family size from per family member income because they cause division errors.

Analysis

Students admitted and enrolled by exception comprised approximately 1.7% of enrolled students for the review period. Table 2 below provides the Admissions by Exception rate as a percentage of enrolled students for certain demographic categories shown in Table 1.

Table 2. Enrolled Students Admitted by Exception as a Percentage of Enrolled Students – Fall 2017 through Winter 2020

		Admission Status		
		Enrolled	Admitted by Exception	
			AxE* Enrolled	% of Enrolled
Residency	California	165,676	1,582	1.0%
	Other US State	11,498	513	4.5%
	International	27,176	1,314	4.8%
	Total	204,350	3,409	1.7%
Race/Ethnicity	African-American/Black	8,724	301	3.5%
	Asian	64,539	486	0.8%
	Latino	52,237	483	0.9%
	Native American	1,015	24	2.4%
	Pacific Islander	508	18	3.5%
	Caucasian/White	44,855	713	1.6%
	International	27,176	1,314	4.8%
	Domestic Unknown	5,296	70	1.3%
	Total	204,350	3,409	1.7%
Athlete Status	Recruited Athletes	3,652	685	18.8%
	Other Students	184,453	1,725	0.9%
	Could Not Determine	16,245	999	6.1%
	Total	204,350	3,409	1.7%

*Admitted by exception

As shown in Table 1 on the previous page, the population of enrolled students whom campuses admitted by exception differs significantly from those whom they admitted under regular admission with respect to residency, racial and ethnic identity, athlete status, and income.

We observed that there is a significantly higher percentage of international students and, to a lesser degree, out-of-state students admitted by exception in comparison to the general admitted population. We asked Systemwide Undergraduate Admissions about the reason for this condition and it explained that it is due at least in part to differences in educational systems that make it technically difficult for applicants who are not California residents to meet minimum University of California admission requirements regardless of their academic achievements. For example, Systemwide Undergraduate Admissions noted that other educational systems typically do not require a sequence of courses that meet the University's subject requirements and may have different grading scales or not use grade point averages. Consequently, campuses identify these students as admitted by exception in accordance with Regental policy.

Given that a portion of international and out-of-state students admitted by exception may be technically ineligible for admission, we compared the standardized test scores of admitted applicants by residency status and found the following. For admitted applicants, California residents' median SAT and ACT scores were 1300 and 31, out-of-state residents' scores were 1420 and 32, and international residents' scores were 1420 and 31, all respectively. For applicants admitted and enrolled by exception, California residents' median SAT and ACT scores were 1160 and 26, out-of-state residents' scores were 1260 and 28, and international residents' scores were 1310 and 27, all respectively (See Appendix 5, Table 10).

For enrolled students admitted by exception, we also observed that differences in racial and ethnic identity are at least partially associated with recruited athletes. Table 3 below presents the racial and ethnic identities of enrolled students whom campuses admitted by exception. The table divides this population into three separate groups of students: all students, recruited athletes, and all other enrolled students whom campuses admitted by exception.

Table 3. Racial/Ethnic Identity and Athlete Status of Enrolled Students Admitted by Exception – Fall 2017 through Winter 2020

		Admitted by Exception and Enrolled					
		Total		Recruited Athletes		Other Students	
Race/Ethnicity	African-American/Black	301	9%	174	25%	127	5%
	Asian	491	14%	41	6%	450	16%
	Latino	483	14%	89	13%	394	14%
	Native American	24	1%	5	<1%	19	1%
	Pacific Islander	18	1%	9	1%	9	<1%
	White/Caucasian	714	20%	233	34%	481	17%
	International	1,404	40%	112	16%	1,292	46%
	Domestic Unknown	70	2%	22	3%	48	2%
	Total	3,505	100%	685	100%	2,820	100%

Individual percentages may not add to 100% due to rounding.

In addition, we observed that enrolled students admitted by exception reported significantly higher median household incomes than regular admission students. This difference is associated with out-of-state and international students, who reported median household incomes that are more than double that of domestic students (see Table 4). Table 4 below presents household income by residency for enrolled students whom campuses admitted by exception. The table divides this population into three separate groups: California residents, out-of-state residents, and international applicants. Note that applicants voluntarily self-report this income data and the University does not verify it.

Table 4. Household Income by Residency for Enrolled Students Admitted by Exception – Fall 2017 through Winter 2020

		Admitted by Exception and Enrolled		
	Residency	**CA**	**Out-of-State**	**International**
Income	Mean	$108,058	$201,625	$264,866
	Median	$69,000	$145,000	$150,000
	Median Per Family Member	$18,567	$34,446	$48,333

Does not include applicant records without self-reported income.

Appendix 1: Audit Objectives and Procedures

The following table outlines the specific audit objectives for the Phase 2 Audit and a summary of the audit procedures performed for each objective.

Audit Objective	Audit Procedures (Summarized)
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	• Determine how the campus identifies and tracks applicants that departments recommend on the basis of special talent • Gain an understanding of existing documentation and approval requirements for each type of special talent recommendation • Determine 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 • Select a sample of Special Talent Admissions, evaluate the sample against existing documentation and approval requirements, and assess whether the source of the documentation supporting the special talent appears to be legitimate, credible, and supports the special talent
To the extent possible, determine the demographic characteristics of admitted applicants who received recommendations based on demonstrated ability in fields such as athletics or the arts	• Obtain available data on admitted applicants who received recommendations on the basis of special talent • Analyze the demographic characteristics of admitted applicants who received recommendations on the basis of special talent **Note:** We were unable to perform these audit procedures due to the lack of available data
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	• Gain an understanding of the categories of acceptable rationale for Admission by Exception and existing requirements • Select a sample of Admissions by Exception and evaluate the sample against existing documentation and approval requirements
To the extent possible, determine the demographic characteristics of applicants admitted and enrolled under the Admissions by Exception policy	• Obtain available data on applicants admitted and enrolled under the Admissions by Exception policy • Analyze the demographic characteristics of applicants admitted and enrolled under the Admissions by Exception policy
Evaluate the operating effectiveness of identified controls over access to admissions IT systems, including basic log-in access to systems, specific levels of access within those systems, and appropriateness of user changes to data	• Perform a risk analysis to determine in-scope systems for test work • For in-scope systems: o Evaluate the controls over user access changes o Determine whether the campus periodically reviews the appropriateness of authorized user access o Select a sample of system users and determine whether their access was appropriately authorized and their level of access aligned with job responsibilities
Evaluate the effectiveness of identified controls over student athlete participation	• Gain an understanding of existing requirements for minimum student athlete participation

Audit Objective	Audit Procedures (Summarized)
	• Determine whether existing controls are sufficient to ensure that records supporting ongoing participation in athletics are kept current throughout the season • Assess the reliability of participation documentation by reviewing controls over the information they contain • Select a sample of admitted non-scholarship student athletes recommended for admission and evaluate associated athletic participation records, including documentation supporting any change in participation status
Evaluate the effectiveness of Systemwide Undergraduate Admissions' annual process to verify undergraduate application information	• Select a sample of applicants that underwent the application verification process, obtain documentation supporting each verified item, and assess its adequacy • Select a sample of permanent verification excusals granted, obtain documentation supporting each excusal, and assess its adequacy
Evaluate the design of internal controls over the undergraduate admissions appeals process	• Perform a walkthrough of the appeals process • Obtain and review relevant policies and procedures

Appendix 2: Recommendations from Phase 1 Audit

1. Documentation Supporting the Admissions Process

Campuses should:

1.1 Document any local policies and develop detailed procedures for all aspects of the application evaluation and admissions process, to include the following:

- Criteria used to evaluate applications, including any qualitative factors considered, consistent with comprehensive review
- Minimum documentation requirements to demonstrate application of criteria in the evaluation results
- For freshman application evaluations that consider qualitative factors, a requirement that at least two independent documented evaluations support a decision to admit

1.2 Document all admissions decisions with sufficient detail to:

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

2. Verifying Application Information

Systemwide Undergraduate Admissions should:

2.1 Document the methodology used to determine the sample size for the annual verification process and annually reassess the sample size based on the current size of the applicant population.

2.2 Perform a risk analysis to determine the relative risk of falsification for each application section and, where present, increase the number of sample items that it selects from each application section according to the risk of falsification as determined by this analysis. As part of this analysis, consider the rate of nonresponse for each category in addition to the rate of identified falsification.

2.3 Develop formal requirements that it must follow for granting and approving permanent excusals from the verification process, including:

- Required follow-up steps when an applicant reports that they are unable to provide supporting documentation for an item being verified, including a requirement to seek alternate documentation such as personal statements from third parties
- A requirement to document its analysis and rationale for granting a permanent excusal
- Approval requirements for permanent excusals

3. Special Talent Admissions

Systemwide Undergraduate Admissions should:

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

Campuses should:

3.2 Clearly identify and track all applicants that departments recommend on the basis of special talent.

3.3 Establish and document the minimum requirements for documented verification of special talent for each department. These minimum requirements should identify the types of information and trusted sources that can be used to confirm qualifications or credentials for a specific sport or talent. Requirements for documented verification of athletic qualifications could be limited to non-scholarship prospective student athletes.

3.4 Require a two-step verification process for any recommendation for admission on the basis of special talent that includes the following:

- The initiator of the recommendation must document and attest, under penalty of disciplinary action, that they have performed an assessment and determined that the level of special talent warrants a recommendation for admission
- An individual in a supervisory capacity must approve the recommendation

For athletics, this process could be limited to non-scholarship prospective student athletes.

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

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

4. Admissions by Exception

Systemwide Undergraduate Admissions should:

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

Campuses should:

4.2 Establish a local campus policy that outlines acceptable rationale and the required evaluation process for admissions by exception. At a minimum, this policy should ensure

that an individual who identifies a candidate for admission by exception cannot make the final admission decision.

4.3 Establish controls to ensure that an acceptable rationale for identifying an applicant to be considered for admission by exception is documented for each applicant being considered under the policy.

4.4 Establish local procedures to annually monitor compliance with the campus percentage limits for admissions by exception established by Regental policy.

5. Conflict of Interest in Admissions Review

Campuses should:

5.1 Establish documented conflict of interest policies and procedures that cover all individuals who are involved in reviewing admissions applications or making admissions decisions, including external readers. At a minimum, these policies and procedures should require that such individuals annually:

- Disclose the nature of their acquaintance with known applicants, their families or any other potential conflict of interest and attest, under penalty of disciplinary action, that they have recused themselves from reviewing applications associated with these potential conflicts
- Attest that they are not aware of any attempt to improperly influence an admissions decision.

5.2 Provide regular training to all individuals who are involved in reviewing admissions applications or making admissions decisions, including external readers, regarding conflicts of interest and associated requirements. This training should include, but not be limited to, the definition of improper influence and provide examples of improper influence in the context of admissions.

5.3 Establish controls requiring external readers to disclose any current affiliations with high schools or community colleges and preventing those who have such affiliations from being assigned an application of a student from that high school or community college for review.

5.4 Establish controls preventing individuals who perform outreach from reviewing applications from individuals with whom they have had more than routine contact.

6. Admissions IT System Access

Campuses should:

6.1 Implement controls to periodically review admissions IT system access to ensure that the level of access is aligned with job responsibilities including, at a minimum, a review of user access before each annual admissions cycle begins.

6.2 Implement controls to log activity in admissions IT systems and periodically review high-risk changes, such as admissions decision changes, for appropriateness. Campuses should define high-risk changes to review and monitor.

7. Athletics Department Recommendation Limits

Campuses should:

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

8. Conflict of Interest in Athletics

Campuses should:

8.1 Establish a policy addressing conflict of interest requirements for athletics personnel including, at a minimum, a requirement to formally disclose and review any known existing relationship between a member of the athletics staff and a prospective student athlete or their family to determine if a potential conflict of interest exists and whether it should be addressed with a management plan.

8.2 Perform an analysis to identify categories of third parties who contact the athletics department regarding prospective student athletes that are unusual or at a higher risk of inappropriately influencing admissions decisions, such as donors, admissions consultants, and athletic recruiting/scouting services not approved by the NCAA. Establish a requirement for all athletics personnel to document all contact from these categories in a central repository. Athletics compliance should at least annually review this list and investigate any questionable contact.

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

9. Monitoring Student Athletes' Participation in Athletic Programs

Campuses should:

9.1 Establish a policy requiring a minimum of one year of participation in an athletic program for non-scholarship student athletes recommended for admission by the athletics department. This policy should include:

- Any exceptions to this requirement
- Approval requirements for any exceptions to the policy
- Consequences for violating the policy

9.2 As a condition of admission, require non-scholarship athletes recommended for admission to sign an agreement that they will comply with the minimum participation requirement, subject to the consequences established in the policy.

9.3 Establish controls to ensure records supporting ongoing participation in athletics are kept current throughout the season.

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

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

10. Independence of Athletics Compliance

Campuses should:

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

11. Monitoring of Donations and Admissions

Campuses should:

11.1 Establish a policy limiting communication between development personnel and the admissions office regarding admissions matters. At a minimum, any communication regarding the admission status of specific applicants should be prohibited.

11.2 Perform a review prior to admission for each non-scholarship recruited athlete to identify any donations from any known relatives of the recruited athlete, or anyone that the athletics department knows to be acting on behalf of the family. A member of senior leadership independent of the athletics department or an existing athletics admissions oversight committee should oversee this review process, including determination of any due diligence required when donations are identified, and approval of any admissions decisions for which donations were identified.

Internal Audit should:

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

Appendix 3: A-G Subject Requirements

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

A. History	2 years
B. English	4 years
C. Mathematics	3 years
D. Laboratory science	2 years
E. Language other than English	2 years*

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

F. Visual and performing arts	1 year
G. College-preparatory elective	1 year

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

Appendix 4: Comprehensive Review Factors

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

For Freshman Applicants

1. Academic grade point average in all completed "A-G" courses, including additional points for completed UC-certified honors courses.

2. Scores on the ACT with Writing or SAT with Essay.

3. Number and content of, and performance in, academic courses beyond the minimum "A-G" requirements.

4. Number of and performance in approved honors courses, Advanced Placement courses, International Baccalaureate courses and transferable college courses.

5. Identification by UC as being ranked in the top 9 percent of their high school class (eligibility in the local context, or ELC).

6. Quality of a student's senior-year program, as measured by the type and number of academic courses in progress or planned.

7. Quality of their academic performance relative to the educational opportunities available in their high school.

8. Outstanding performance in one or more academic subject areas.

9. Outstanding work in one or more special projects in any academic field of study.

10. Recent, marked improvement in academic performance, as demonstrated by academic GPA and the quality of coursework completed or in progress.

11. Special talents, achievements and awards in a particular field, such as visual and performing arts, communication or athletic endeavors; special skills, such as demonstrated written and oral proficiency in other languages; special interests, such as intensive study and exploration of other cultures; experiences that demonstrate unusual promise for leadership, such as significant community service or significant participation in student government; or other significant experiences or achievements that demonstrate the student's promise for contributing to the intellectual vitality of a campus.

12. Completion of special projects undertaken in the context of a student's high school curriculum or in conjunction with special school events, projects or programs.

13. Academic accomplishments in light of a student's life experiences and special circumstances, including but not limited to: disabilities, low family income, first generation

to attend college, need to work, disadvantaged social or educational environment, difficult personal and family situations or circumstances, refugee status or veteran status.

14. Location of a student's secondary school and residence.

For Transfer Applicants

1. Completion of a specified pattern or number of courses that meet breadth or general education requirements.

2. Completion of a specified pattern or number of courses that provide continuity with upper division courses in the student's major, such as a UC Transfer Pathway, AA degree for transfer (offered at CA community colleges only), or UC campus-specific major prerequisites.

3. Grade point average in all transferable courses and, in particular, grade point average in lower-division courses included in a UC Transfer Pathway or required for the applicant’s intended major.

4. Participation in academically selective honors courses or programs.

5. Special talents, achievements and awards in a particular field, such as visual and performing arts, communication or athletic endeavors; special skills, such as demonstrated written and oral proficiency in other languages; special interests, such as intensive study and exploration of other cultures; experiences that demonstrate unusual promise for leadership, such as significant community service or significant participation in student government; or other significant experiences or achievements that demonstrate the student's promise for contributing to the intellectual vitality of a campus.

6. Completion of special projects undertaken in the context of the college curriculum or in conjunction with special school events, projects or programs.

7. Academic accomplishments in light of the student's life experiences and special circumstances.

8. Location of the student's college and residence.

9. Completion of a UC Transfer Pathway or an AA degree for transfer offered by a California community college.

Appendix 5: Additional Data Analyses

Table 5. Characteristics of Admitted Applicants and Enrolled Students by Year – Fall 2017 through Winter 2020

		Admission Status (All Applicants)																	
		Admitted						Enrolled						Admitted by Exception and Enrolled					
		2017-2018		2018-2019		2019-2020		2017-2018		2018-2019		2019-2020		2017-2018		2018-2019		2019-2020	
Residency	California	206,833	72%	206,692	72%	208,698	72%	54,847	81%	56,195	81%	54,634	81%	492	51%	599	45%	491	44%
	Other US State	30,604	11%	30,363	11%	30,955	11%	3,914	6%	3,801	5%	3,783	6%	171	18%	184	14%	158	14%
	International	47,369	17%	48,519	17%	49,205	17%	8,885	13%	9,365	14%	8,926	13%	301	31%	549	41%	464	42%
	Total	284,806	100%	285,574	100%	288,858	100%	67,646	100%	69,361	100%	67,343	100%	964	100%	1,332	100%	1,113	100%
Race/Ethnicity	African-American/Black	10,862	4%	11,257	4%	11,197	4%	2,898	4%	3,058	4%	2,768	4%	95	10%	121	9%	85	8%
	Asian	90,025	32%	90,281	32%	92,298	32%	20,948	31%	21,901	32%	21,690	32%	148	15%	188	14%	150	13%
	Latino	61,949	22%	63,715	22%	65,859	23%	17,377	26%	17,701	26%	17,159	25%	171	18%	169	13%	143	13%
	Native American	1,413	<1%	1,317	<1%	1,236	<1%	336	<1%	359	<1%	320	<1%	9	<1%	11	<1%	4	<1%
	Pacific Islander	692	<1%	610	<1%	666	<1%	169	<1%	163	<1%	176	<1%	3	<1%	6	<1%	9	<1%
	Caucasian/White	63,783	22%	60,857	21%	60,187	21%	15,244	23%	14,941	22%	14,670	22%	214	22%	266	20%	233	21%
	International	47,369	17%	48,519	17%	49,205	17%	8,885	13%	9,365	14%	8,926	13%	301	31%	549	41%	464	42%
	Domestic Unknown	8,713	3%	9,018	3%	8,210	3%	1,789	3%	1,873	3%	1,634	2%	23	2%	22	2%	25	2%
	Total	284,806	100%	285,574	99%	288,858	100%	67,646	100%	69,361	101%	67,343	100%	964	98%	1,332	99%	1,113	100%
Athlete Status	Recruited Athletes	1,511	<1%	1,501	<1%	1,437	<1%	1,224	2%	1,233	2%	1,195	2%	211	22%	265	20%	209	19%
	Other Students	249,859	87%	248,993	87%	251,204	87%	60,977	90%	62,544	90%	60,932	90%	589	61%	638	48%	498	45%
	Could Not Determine	33,436	12%	35,080	12%	36,217	13%	5,445	8%	5,584	8%	5,216	8%	164	17%	429	32%	406	36%
	Total	284,806	99%	285,574	99%	288,858	100%	67,646	100%	69,361	100%	67,343	100%	964	100%	1,332	100%	1,113	100%
Income	Mean	$141,183		$150,007		$156,674		$120,295		$130,089		$136,844		$162,125		$185,708		$189,602	
	Median	$90,000		$97,936		$100,000		$75,000		$80,000		$86,000		$99,000		$110,000		$120,000	
	Median Per Family Member	$23,600		$25,000		$25,754		$20,000		$21,000		$22,500		$24,988		$30,000		$33,333	

Individual percentages may not add to 100% due to rounding.

Table 6. Characteristics of Freshman Admitted Applicants and Enrolled Students – Fall 2017 through Winter 2020

		Admission Status (Freshman)					
		Admitted		Enrolled		AxE* Enrolled	
Residency	California	452,106	69%	110,466	79%	773	33%
	Other US State	90,553	14%	11,137	8%	472	20%
	International	114,387	17%	18,416	13%	1,086	47%
	Total	657,046	100%	140,019	100%	2,331	100%
Race/Ethnicity	African-American/Black	24,329	4%	5,654	4%	202	8%
	Asian	219,378	33%	48,220	34%	318	14%
	Latino	142,463	22%	35,837	26%	253	11%
	Native American	2,918	<1%	625	<1%	14	<1%
	Pacific Islander	1,416	<1%	320	<1%	12	<1%
	White/Caucasian	131,366	20%	27,243	19%	395	17%
	International	114,387	17%	18,416	13%	1,086	47%
	Domestic Unknown	20,789	3%	3,704	3%	51	2%
	Total	657,046	100%	140,019	100%	2,331	100%
Athlete Status	Recruited Athletes	3,831	<1%	3,085	2%	499	21%
	Other Students	570,146	87%	125,412	90%	1,106	47%
	Could Not Determine	83,069	13%	11,522	8%	726	31%
	Total	657,046	100%	140,019	100%	2,331	100%
Income	Mean	$164,098		$142,107		$203,833	
	Median	$105,000		$90,000		$120,000	
	Median Per Family Member	$28,000		$23,232		$33,333	

Individual percentages may not add to 100% due to rounding.

*Admitted by exception

Table 7. Characteristics of Transfer Admitted Applicants and Enrolled Students – Fall 2017 through Winter 2020

		Admission Status (Transfers)					
		Admitted		Enrolled		AxE* Enrolled	
Residency	California	170,117	84%	55,210	86%	809	75%
	Other US State	1,369	<1%	361	<1%	41	4%
	International	30,706	15%	8,760	14%	228	21%
	Total	202,192	100%	64,331	100%	1,078	100%
Race/Ethnicity	African-American/Black	8,987	4%	3,070	5%	99	9%
	Asian	53,226	26%	16,319	25%	168	16%
	Latino	49,060	24%	16,400	25%	230	21%
	Native American	1,048	<1%	390	<1%	10	<1%
	Pacific Islander	552	<1%	188	<1%	6	<1%
	White/Caucasian	53,461	26%	17,612	27%	318	30%
	International	30,706	15%	8,760	14%	228	21%
	Domestic Unknown	5,152	3%	1,592	2%	19	2%
	Total	202,192	100%	64,331	100%	1,078	100%
Athlete Status	Recruited Athletes	618	<1%	567	<1%	186	17%
	Other Students	179,910	89%	59,041	92%	619	57%
	Could Not Determine	21,664	11%	4,723	7%	273	25%
	Total	202,192	100%	64,331	100%	1,078	100%
Income	Mean	$103,216		$101,306		$131,672	
	Median	$60,000		$60,000		$80,000	
	Median Per Family Member	$17,000		$17,958		$22,500	

Individual percentages may not add to 100% due to rounding.

*Admitted by exception

Table 8. Characteristics of Freshman Admitted Applicants and Enrolled Students by Year – Fall 2017 through Winter 2020

		Admission Status (All Applicants)																	
		Admitted						Enrolled						Admitted by Exception and Enrolled					
		2017-2018		2018-2019		2019-2020		2017-2018		2018-2019		2019-2020		2017-2018		2018-2019		2019-2020	
Residency	California	151,895	69%	149,564	69%	150,647	69%	36,831	79%	37,076	79%	36,559	79%	271	41%	280	31%	222	29%
	Other US State	30,102	14%	29,894	14%	30,557	14%	3,784	8%	3,669	8%	3,684	8%	156	24%	167	18%	149	20%
	International	37,086	17%	38,528	18%	38,773	18%	6,046	13%	6,350	13%	6,020	13%	232	35%	465	51%	389	51%
	Total	219,083	100%	217,986	100%	219,977	100%	46,661	100%	47,095	100%	46,263	100%	659	100%	912	100%	760	100%
Race/Ethnicity	African-American/Black	8,040	4%	8,187	4%	8,102	4%	1,916	4%	1,945	4%	1,793	4%	66	10%	78	9%	58	8%
	Asian	72,461	33%	72,739	33%	74,178	34%	15,546	33%	16,396	35%	16,278	35%	94	14%	124	14%	100	13%
	Latino	46,704	21%	46,806	21%	48,953	22%	12,188	26%	11,837	25%	11,812	26%	106	16%	83	9%	64	8%
	Native American	1,078	<1%	962	<1%	878	<1%	206	<1%	224	<1%	195	<1%	5	<1%	7	<1%	2	<1%
	Pacific Islander	485	<1%	451	<1%	480	<1%	98	<1%	105	<1%	117	<1%	2	<1%	3	<1%	7	<1%
	Caucasian/White	46,291	21%	42,993	20%	42,082	19%	9,426	20%	8,903	19%	8,914	19%	135	20%	138	15%	122	16%
	International	37,086	17%	38,528	18%	38,773	18%	6,046	13%	6,350	13%	6,020	13%	232	35%	465	51%	389	51%
	Domestic Unknown	6,938	3%	7,320	3%	6,531	3%	1,235	3%	1,335	3%	1,134	2%	19	3%	14	2%	18	2%
	Total	219,083	100%	217,986	100%	219,977	100%	46,661	100%	47,095	100%	46,263	100%	659	100%	912	100%	760	100%
Athlete Status	Recruited Athletes	1,303	<1%	1,264	<1%	1,264	<1%	1,032	2%	1,013	2%	1,040	2%	153	23%	186	20%	160	21%
	Other Students	190,543	87%	189,701	87%	189,902	86%	41,564	89%	42,364	90%	41,484	90%	348	53%	441	48%	317	42%
	Could Not Determine	27,237	12%	27,021	12%	28,811	13%	4,065	9%	3,718	8%	3,739	8%	158	24%	285	31%	283	37%
	Total	219,083	100%	217,986	100%	219,977	100%	46,661	100%	47,095	100%	46,263	100%	659	100%	912	100%	760	100%
Income	Mean	$154,634		$164,670		$172,775		$131,837		$143,327		$151,043		$183,995		$205,387		$218,656	
	Median	$100,000		$106,000		$113,494		$83,000		$92,000		$100,000		$105,000		$121,741		$144,475	
	Median Per Family Member	$26,250		$28,000		$30,000		$21,050		$23,333		$25,000		$26,667		$33,333		$37,500	

Individual percentages may not add to 100% due to rounding.

Table 9. Characteristics of Transfer Admitted Applicants and Enrolled Students by Year – Fall 2017 through Winter 2020

		Admission Status (All Applicants)																	
		Admitted						Enrolled						Admitted by Exception and Enrolled					
		2017-2018		2018-2019		2019-2020		2017-2018		2018-2019		2019-2020		2017-2018		2018-2019		2019-2020	
Residency	California	54,938	84%	57,128	85%	58,051	84%	18,016	86%	19,119	86%	18,075	86%	221	72%	319	76%	269	76%
	Other US State	502	<1%	469	<1%	398	<1%	130	<1%	132	<1%	99	<1%	15	5%	17	4%	9	3%
	International	10,283	16%	9,991	15%	10,432	15%	2,839	14%	3,015	14%	2,906	14%	69	23%	84	20%	75	21%
	Total	65,723	100%	67,588	100%	68,881	100%	20,985	100%	22,266	100%	21,080	100%	305	100%	420	100%	353	100%
Race/Ethnicity	African-American/Black	2,822	4%	3,070	5%	3,095	4%	982	5%	1,113	5%	975	5%	29	10%	43	10%	27	8%
	Asian	17,564	27%	17,542	26%	18,120	26%	5,402	26%	5,505	25%	5,412	26%	54	18%	64	15%	50	14%
	Latino	15,245	23%	16,909	25%	16,906	25%	5,189	25%	5,864	26%	5,347	25%	65	21%	86	20%	79	22%
	Native American	335	<1%	355	<1%	358	<1%	130	<1%	135	<1%	125	<1%	4	1%	4	1%	2	<1%
	Pacific Islander	207	<1%	159	<1%	186	<1%	71	<1%	58	<1%	59	<1%	1	<1%	3	<1%	2	<1%
	Caucasian/White	17,492	27%	17,864	26%	18,105	26%	5,818	28%	6,038	27%	5,756	27%	79	26%	128	30%	111	31%
	International	10,283	16%	9,991	15%	10,432	15%	2,839	14%	3,015	14%	2,906	14%	69	23%	84	20%	75	21%
	Domestic Unknown	1,775	3%	1,698	3%	1,679	2%	554	3%	538	2%	500	2%	4	1%	8	2%	7	2%
	Total	65,723	100%	67,588	100%	68,881	100%	20,985	100%	22,266	100%	21,080	100%	305	100%	420	100%	353	100%
Athlete Status	Recruited Athletes	208	<1%	237	<1%	173	<1%	192	<1%	220	1%	155	<1%	58	19%	79	19%	49	14%
	Other Students	59,316	90%	59,292	88%	61,302	89%	19,413	93%	20,180	91%	19,448	92%	241	79%	197	47%	181	51%
	Could Not Determine	6,199	9%	8,059	12%	7,406	11%	1,380	7%	1,866	8%	1,477	7%	6	2%	144	34%	123	35%
	Total	65,723	100%	67,588	100%	68,881	100%	20,985	100%	22,266	100%	21,080	100%	305	100%	420	100%	353	100%
Income	Mean	$98,156		$104,200		$107,016		$95,092		$102,455		$106,186		$117,673		$144,297		$128,670	
	Median	$55,000		$58,000		$63,000		$58,000		$60,000		$66,713		$72,986		$90,000		$80,000	
	Median Per Family Member	$16,250		$16,947		$18,333		$16,667		$18,000		$19,000		$18,890		$24,000		$25,519	

Individual percentages may not add to 100% due to rounding.

Table 10. Test Scores by Residency for Admitted and Enrolled Applicants – Fall 2017 through Winter 2020

		Admission Status (All Applicants)					
		Admitted		Enrolled		AxE* Enrolled	
	Median Test Score	SAT	ACT	SAT	ACT	SAT	ACT
Residency	California	1300	31	1270	30	1160	26
	Other US State	1420	32	1420	32	1260	28
	International	1420	31	1400	30	1310	27

Individual percentages may not add to 100% due to rounding. Does not include applicant records without test scores. For the SAT, we only present scores for the current version because it has a different score range than the previous version of the test.

*Admitted by exception

Audit of Undergraduate Admissions Management Corrective Actions – UCSD
UCOP Project No. P20A005 and AMAS Project #2020-11

Recommendation	Management Corrective Action	Target Date
A. Documentation Supporting the Admission Process. **A.1** Ensure that any committee charged with making admissions decisions develop a charter that includes, at a minimum, the committee's: • 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	At UCSD, an Admissions Selection Team, under the direction of the Committee on Admissions, is responsible for making admissions decisions. Admissions will ensure that the Admissions Selection Team develops a charter that includes, but may not be limited to: • 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	June 1, 2020
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.	Admissions will 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. Exceptions to the UC Records Retention schedule will be necessary when the Office of Admissions is required to retain/maintain documents pertaining to potential legal action and/or issues. Training will be provided to the appropriate personnel on records retention requirements.	June 1, 2020
C. Special Talent Admissions ("Special Admissions") **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.	Admissions will 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.	June 1, 2020

Recommendation	Management Corrective Action	Target Date
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.	Admissions will 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. Exceptions to the UC Records Retention schedule will be necessary when the Office of Admissions is required to retain/maintain documents pertaining to potential legal action and/or issues. Training will be provided to the appropriate personnel on records retention requirements.	June 1, 2020
D. Admission by Exception **D.3** Implement controls to ensure accurate classification of Admissions by Exception for all students that campuses admit and enroll under the policy, including identifying and tracking of student athletes and those designated as "disadvantaged" or "other."	Systemwide Undergraduate Admissions provides Admissions by Exception codes. Based on the codes available, Admissions will implement controls to ensure accurate classification of Admissions by Exception for all students that the campus admits and enrolls under the policy, including identifying and tracking student athletes and those designated as "disadvantaged" or "other."	June 1, 2020
E. Admissions IT System Access **E.1** Update admissions IT system user access to ensure that access is appropriately aligned with job responsibilities.	Admissions will update admissions IT system user access to ensure that access is appropriately aligned with job responsibilities.	June 1, 2020
E.2 Document admissions IT system access provisioning processes to ensure that access is only provided to authorized individuals and that access rights are consistent with users' roles and responsibilities. At a minimum, these procedures should require: • Documented justification and authorization for user access to admissions IT systems • Maintenance of a list of authorized users and associated privileges	Admissions will document admissions IT system access provisioning processes to ensure that access is only provided to authorized individuals and that access rights are consistent with users' roles and responsibilities. At a minimum, these procedures will require: • Documented justification and authorization for user access to admissions IT systems • Maintenance of a list of authorized users and associated privileges	June 1, 2020

Recommendation	Management Corrective Action	Target Date
F. Monitoring Student Athletes' Participation in Athletic Programs **F.1** Implement controls, such as required forms, to ensure that reasons for changes in athletics program participation status are clearly documented.	Athletics has implemented a policy and procedures requiring any removal from a roster to be documented through a Removal from Roster form, which includes documenting the reason for changes in athletics program participation status. For non-scholarship athletes, the coach is required to indicate if the scholar-athlete participated with the team for less than a full academic year.	Completed
G. Admissions Appeal Process **G.1** Develop or amend local policies and procedures to address requirements for all appeals decisions. The policies and procedures should include the following: • A requirement that all appeal reviews be fully documented, including analyses, recommendations, decisions, and individuals involved. • 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.	Admissions will document local policies and procedures to address requirements for all appeals decisions. The policies and procedures will include the following: • A requirement that all appeal reviews be fully documented, including analyses, recommendations, decisions, and individuals involved. • 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.	June 1, 2020

LOCAL UCSD MANAGEMENT CORECTIVE ACTIONS

Recommendation	Management Corrective Action	Target Date
H. Arts & Humanities Review Process H.1 Arts & Humanities should review Phase 1 MCA 5.1 and 8.1 and incorporate a conflict of interest process and policy.	Arts & Humanities portfolio will document a conflict of interest process and policy requiring reviewers to recuse themselves from reviewing applications of known applicants, their families or any other potential conflict of interest.	June 1, 2020
H.2 Arts and Humanities should develop and document criteria for each program to justify the portfolio skills ratings.	Arts and Humanities will develop and document criteria for each program to justify the portfolio skills ratings.	June 1, 2020

Recommendation	Management Corrective Action	Target Date
I. Arts & Humanities IT Systems I. Implement controls to periodically review 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, as recommended in MCA 6.1, Phase 1 review.	Arts and Humanities have documented a process for annual review of access to the Slide Room portfolio management system.	Completed

Summary of Audit Procedures and UCSD Results
Undergraduate Admissions – Phase 2
Report 2020-11

Objective	Summary of Procedures	UCSD Results	Reference to UCOP Systemwide Recommendation for Phase II
Special Talent Admissions			
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.	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; 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. 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.	UCSD did not systematically identify or track candidates for Special Talent Admissions. Athletics did not have a process to document the special talent to ensure it was verified and legitimate. Coaches were responsible for recruiting for their own sport and verifying athletic ability. Athletics performed preliminary evaluations for prospective student athletes (PSA) to determine if they met minimum admissions requirements; however, final admissions decisions were made by the Admission Selection Team[1]. Our testing of 25[2] special talent applicants for this audit period indicated that six did not have substantive documentation to verify special talent.	Systemwide Recommendations 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.
Admissions by Exception (AbyE)			
Evaluate the operating effectiveness of identified controls over AbyE, including the rationale by which the campus identified a given applicant for consideration under	Gained an understanding of the categories of acceptable rationale for AbyE and existing requirements; Selected a sample of AbyE and evaluated the sample against existing documentation and approval requirements.	Admissions decisions for AbyE applicants were made by the Admissions Leadership Team. The rationale for three of 25 sampled students could not be determined because the AbyE code was a general code that did not specify the reason.	Systemwide Recommendation A.1 addresses formal charters for committees charged with making admissions decisions. Recommendation A.2 addresses retention of documentation supported admission decisions,

[1] A leadership team comprised of the Associate Vice Chancellor for Enrollment Management, Director of Admissions, Senior Associate Director of Admissions, and Enrollment Management Data Analyst in consultation with Institutional Research.
[2] Comprised of 13 Athletics applicants and 12 Arts & Humanities applicants. Arts & Humanities samples were included in Phase II testing; however, based on a subsequent discussion with UCOP, this process does not meet the draft definition of "special talent recommendation." Final guidance is pending.

Objective	Summary of Procedures	UCSD Results	Reference to UCOP Systemwide Recommendation for Phase II
the policy and the evaluation process.		Approval for four of 25 sampled applicants recommended for director's review was not documented.	and D.3 addresses accurate classification of AbyE admits.
Admissions IT Systems Access			
Evaluate the operating effectiveness of identified controls over access to admissions IT systems, including basic log-in access to systems, specific levels of access within those systems, and appropriateness of user changes to data.	Perform a risk analysis to determine in-scope systems for test work. For in-scope systems, evaluated the controls over user access changes; determined whether the campus periodically reviews the appropriateness of authorized user access, and for a sample of system users, determined whether their access was appropriately authorized and their level of access aligned with job responsibilities.	Admissions users identified in Phase I of the review as having access to Slate[3] system after their job responsibilities had been discontinued were removed. Our sample review of 25 users indicated that access was supported based on job descriptions. However, Admissions did not always maintain documentation for granting access to application-review system users.	Systemwide Recommendations E.1 and E.2 address ensuring access is aligned with job responsibilities, and ensuring documentation of IT system access provisioning.
Student Athlete Participation			
Evaluate the effectiveness of identified controls over student athlete participation.	Gained an understanding of existing requirements for minimum student athlete participation; Determined whether existing controls are sufficient to ensure that records supporting ongoing participation in athletics are kept current throughout the season; Assessed the reliability of participation documentation by reviewing controls over the information they contain; For a sample of admitted non-scholarship student athletes recommended for admission, evaluated associated athletic participation records, including documentation supporting any change in participation status.	We found that some controls were in place to monitor athlete participation in the ARMS system. Coaches were responsible for updating athletic participation including practice, weight lifting, conditioning, and competition logs. Our sample of 25 athletes indicated that all but three participated for one year. For the three who did not, the reason for the change was documented. However, Athletics did not have requirements for minimum student athlete participation.	Systemwide Recommendation F.1 addresses additional controls related to changes in participation status.

[3] UCSD application review

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Objective	Summary of Procedures	UCSD Results	Reference to UCOP Systemwide Recommendation for Phase II
Appeals Process			
Evaluate the design of internal controls over the undergraduate admissions appeals process.	Performed a walkthrough of the appeals process; Obtained and reviewed relevant policies and procedures.	Admissions follows admissions appeals guidelines for freshman and transfer appeals under the direction of the Committee on Admission. An Appeals Committee reviews all appeals and recommends to uphold or overturn the original admission decision. A recommendation for overturning is then reviewed by the Associate Director of Admissions and Director of Admissions. A single person cannot decide admissions decision appeals.	Systemwide Recommendation 6.1 addresses additional controls for local procedures related to appeals decisions.