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**Subject: *Admissions Data Analytics (Systemwide)
Report 2023-11***

Audit & Management Advisory Services (AMAS) has completed an Admissions Data Analytics Review at UC San Diego (UCSD) as part of a systemwide review included on the approved audit plan for Fiscal Year 2022-23. The review was completed under the direction of and in coordination with the University of California Office of the President (UCOP) Ethics Compliance and Audit Services (ECAS). This report summarizes the results of our review.

Background

In June 2019, UCOP ECAS issued the systemwide internal audit, "Systemwide Audit of Undergraduate Admissions," project P19A019. The audit observed that an opportunity existed for UC campuses with undergraduate programs to strengthen their controls further to reduce admissions fraud risk by monitoring donations and admissions. While the audit found that none of the UC campuses considered donations when making admissions decisions, the review recommended that campuses implement protocols to limit communication between development and admissions, and processes to periodically review large donations to the campus to identify potential admissions decisions that these donations could have influenced. The audit also recommended that internal audit periodically perform a retrospective review of donations to the campus to identify admissions decisions that could have been influenced by donations and that any questionable admissions decisions identified through this process would be referred to the Locally Designated Official (LDO) for investigation. In addition to this review, UCSD completed these reviews in Fiscal Year 2020-21 (AMAS report #2021-06) and Fiscal Year 2021-22 (AMAS report #2022-09).

UCSD received approximately 121,500 applications for the 2020-21 academic year and 141,100 for the 2021-22 academic year. The campus uses a holistic review process that entails considering the full spectrum of applicant qualifications viewed in the 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 (Grade Point Average and test scores) and other pertinent qualifications, including extracurricular activities, leadership, community involvement, distinctive talents, and challenges or hardships overcome. Each application has, at a minimum, two

independent reads by trained readers that are scored and added to the comprehensive review. If the two readers' scores are more than one point apart, a third reader will review and score the applicant, which will be the final overriding score. This score is only one piece of the holistic review. No single factor plays a deciding role in the decision process; it is a combination of the entire student application.

UCSD has a Committee on Admissions consisting of faculty members who set the policy for Admissions to implement operationally. The Committee has delegated the authority to make the final admission decision to the Admission Selection Team, which comprises 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.

Advancement at UCSD is comprised of seven departmental areas that support philanthropic partnerships. These areas include Advancement Operations and Campaign (AOC), Advancement Services, Annual Giving and Pipeline Development, Health Sciences Advancement, Leadership Strategy and Engagement, UCSD Alumni and University Development.

Audit Objective, Scope and Procedures

The objective of our review was to perform data analytics to identify undergraduate admissions decisions that could have been influenced by donations or by the applicant's relationship to a member of the Senior Management Group (SMG). Any matches of donor to admit data identified through this process were analyzed, documented, and referred to the LDO to determine whether to investigate further. The scope of the review included the following:

- Donations received by UCSD during the period January 1, 2019 through September 2022;
- Applications for undergraduate admission submitted for November 1, 2019 through March 31, 2022 for the 2020-21 and 2021-22 academic years (date range includes both the regular application periods¹ and the late application periods²;
- A dataset of local SMG personnel active from January 1, 2019 through October 24, 2022.

To conduct this review, we performed the following procedures:

- Obtained a dataset of donations received during the audit period;
- Obtained a dataset of applications for undergraduate admission submitted during the audit period;
- Obtained a dataset of personal information for SMG personnel active during the period;
- Performed data analysis to identify admissions of applicants who may be related to donors from the donations' dataset. Data fields compared across datasets to identify "matches" included all or a subset of the following: names of donors and donors' spouses, names of admitted students and parents, addresses, email addresses, phone numbers, foundations, or businesses with the same name as the admitted student, and campus ID number. This analysis

¹ November 1, 2019 through October 31, 2020 for academic year 2020-21 and November 1, 2020 through October 31, 2021 for academic year 2021-22.

² November 1, 2020 through March 31, 2021 for academic year 2020-21 and November 1, 2021 through March 31, 2022 for academic year 2021-22

was limited to cumulative matching donations of \$10,000 or more received during the audit period;

- Performed data analysis to identify admissions of applicants who may be related to active SMG personnel during the period above (and/or spouses as applicable);
- Reviewed data trends and other available information to assess the risk of questionable admissions decisions (i.e., those at risk of being influenced by donations) for the “matches” identified. Criteria/factors considered as part of this assessment included the following:
 - Dollar amount of the donation
 - Unusual or suspicious pattern or timing of giving
 - Applicants admitted by exception
 - Applicants admitted to a school with impacted majors
 - Applicants who were recommended for admission on the basis of special talent
 - Low application review scores/ratings
 - Department or program to which donations have been directed as well as their specified purpose.
- Provided the risk assessment results for the matches we identified to the LDO to determine whether to further investigate any of the matches.

Conclusion

Our analysis identified 67 matches of applicants admitted to UCSD who appear to be related to donors who gave a cumulative amount of \$10,000 or more during the audit period. SMG data was also matched to donors and applicants, and we found no new matches to students admitted to UCSD for the period under review. We referred the 67 matches to the LDO to prioritize for further analysis and/or investigation. Referral to the LDO is not necessarily indicative of improper influence or inappropriate activities associated with admissions decisions; instead, it is an indication that additional review or analysis may be appropriate.

Supporting Comments

We obtained data from three separate sources for our data analysis: UCOP Admissions, UCSD Admissions, and UCSD Advancement. Both UCOP and UCSD Admission offices provided student applicant data. Advancement provided the donor data with donation details that we analyzed against the admission data. UCOP also provided SMG data that UCSD validated prior to conducting this analysis. We used various data analysis tools to normalize data and conduct the analysis, including finding the matches.

Based on our analysis, we determined that 67 matches required additional analysis by UCSD. Risk analysis was limited to admissions that could be associated with cumulative matching donations of \$10,000 or more received during the audit period. For these matches, we applied additional analysis based on the following factors:

- Nature of donation – whether the donation was made to a sports program to which the applicant was admitted, or to a fund related to the applicant’s major;

- Timing of donation – whether the donation was made early enough to influence the student’s admission (i.e. before admission decisions were made);
- Donor relationship to UCSD – whether the donor was a faculty, staff, or some other UCSD affiliate;
- Participation in sport/special program – whether the applicant was admitted based on special talent and if they participated in the program; and
- Read average – whether the admitted student’s average read score was below or above average for the population of admits in their admission cycle.
- Dollar amount of donation – the amount of cumulative donations made by the donor in each applicant-donor match during the specified audit period.

The risk assessment for the 67 matches of applicants admitted to UCSD who appear to be related to donors who gave a cumulative amount of \$10,000 or more during the audit period was documented and provided to the LDO for further review.

Audit & Management Advisory Services appreciates the cooperation and assistance provided during the review.

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 (858) 534-1191.

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