

## UC RIVERSIDE: AUDIT & ADVISORY SERVICES

Date: April 3, 2020

To: Emily D Engelschall, Interim Associate Vice Chancellor Enrollment Services

Subject: Local Report on the Systemwide Audit of the Undergraduate Admissions Process (Phase II)

Ref: R2020-09

We have completed the Systemwide Audit of the Undergraduate Admissions Process (Phase II) in accordance with the University of California, Riverside (UCR) Audit Plan. Our report summarizes the results of the audit work done at UCR and is attached for your review.

We will perform audit follow-up procedures in the future to review the status of management action. This follow-up may take the form of a discussion or perhaps a limited review. Audit R2020-09 will remain open until we have evaluated the actions taken.

We appreciate the cooperation and assistance provided by you and your staff. Should you have any questions concerning the report, please do not hesitate to contact me.

Gregory Moore  
Director

cc: Ethics & Compliance Risk and Audit Controls (ECRAC) Committee  
Deborah L Jaurigue, Associate Director of Recruitment and Evaluation  
Tamica N Smith Jones, Director of Athletics  
Joshua Smith, Assistant Athletics Director, Compliance Services  
Ashley Araya, Policy, Compliance, and Training Officer

UNIVERSITY OF CALIFORNIA AT RIVERSIDE  
AUDIT & ADVISORY SERVICES  
INTERNAL AUDIT REPORT R2020-09  
LOCAL REPORT ON THE SYSTEMWIDE AUDIT OF THE UNDERGRADUATE  
ADMISSIONS PROCESS – PHASE II  
April 2020

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**UC RIVERSIDE**  
**LOCAL REPORT ON THE SYSTEMWIDE AUDIT OF THE UNDERGRADUATE**  
**ADMISSIONS PROCESS- PHASE II**  
**INTERNAL AUDIT REPORT R2020-09**  
**April 2020**

**I. MANAGEMENT SUMMARY**

In response to the 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 athletics admissions, but also its entire admissions process to ensure that adequate controls are in place to reduce its exposure to such third party interference. Accordingly, in Fiscal Year (FY) 2018-19, the UC Systemwide Office of Ethics, Compliance and Audit Services (ECAS) amended its FY 2018-19 Audit Plan to perform a Systemwide Audit of Undergraduate Admissions (Phase I Audit). The Phase I Audit assessed the design of controls over the admissions and related processes. ECAS coordinated the execution of the Phase I Audit with the Internal Audit departments at all UC campuses and issued the final Phase I Audit report on June 20, 2019.

In accordance with the FY 2019-20 University of California (UC) Audit Plan, ECAS oversaw Phase II of the Systemwide Audit of Undergraduate Admissions (Phase II Audit). Similar to the fiscal year 2018-19 audit, ECAS coordinated execution of this Phase II Audit with the UCR Office of Audit & Advisory Services as well as other UC Internal Audit departments. Building on the foundation of the Phase I Audit, this Phase II Audit assessed the operational effectiveness of controls identified in the first audit.

There are Systemwide audit (phase II) observations, recommendations, and management action plans noted in the Systemwide Audit Report of Undergraduate Admissions. These recommendations and related management action plans are attached at the end of this report (See Appendix A).

This report details the procedures and results related to the UCR Campus.

**II. INTRODUCTION**

**A. PURPOSE**

UC Riverside Audit & Advisory Services (A&AS), as part of its Audit Plan, performed a review of the UCR Undergraduate Admissions to evaluate the effectiveness of its system of internal controls including controls over the admissions process of student athletes and other non-standard admission that facilitate compliance with relevant policies and regulations and reduce exposure to potential admissions related fraud risk.

**B. BACKGROUND***Overview of the Admission Process*

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, these applications are uploaded to the Student System (Banner) automatically as soon as they are received from applicants. When these applications are entered in the Banner System, the Academic Index Scoring (AIS) System calculates/scores these applications and puts them in the different categories. Some students become eligible by default in the system after the AIS calculation. However, for the applications wherein automatic eligibility has not been determined by AIS, Admissions Counsellors (ACs) are assigned to review and evaluate these applications. UC Riverside is unique in a sense that it does not perform either performance or holistic reviews. UCR's fixed weight comprehensive review model, that results in an AIS score, weighs the following information for each applicant:

- Weighted/Capped Grade Point Average (GPA)
- Highest American College Test (ACT) with Writing or Scholastic Aptitude Test (SAT) with Essay taken in a single sitting
- Number of Advanced Placement (AP) or International Baccalaureate (IB) courses attempted
- First generation status of applicant
- Low income designation of applicant's family

Once the application deadline has passed and the University has distributed all applications to the campuses, the campus Admissions and Enrollment Management office and local Academic Senate Admissions Committee 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 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.

### *Admissions Requirements*

The admissions requirements for all UCs including UCR 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 examination requirements SAT with Essay or ACT with Writing scores, and 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 a 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 the applicants' high school environment, personal accomplishments, family environment, and other circumstances.

BOARS developed guidelines for selection criteria under comprehensive review, including specific factors that campuses may consider as part of the review process for Freshman and Transfer admissions. BOARS suggests 14 factors for consideration of Freshman applicants, including six non-academic and eight academic factors. For Transfer applicants, the BOARS guidance recommends consideration of nine factors that consist of four non-academic and five academic factors, three of which involve transfer-specific admissions requirements. See Appendix 1 for further details on each of the Comprehensive Review factors that campuses consider for Freshman and Transfer applicants.

Although UC Riverside does not have a holistic approach, the campus employs Comprehensive Review using five of these 14 factors in its admissions selection process, all of which are standard measurable criteria.

### *Application Verification Process*

UC Riverside verifies the grades and standardized test scores of applicants who accept offers of admission. This process occurs throughout the application cycle and continues through the Summer and into Fall. The testing/results and conclusions of this section were determined at the UCOP level and addressed in the systemwide final report.

### *Special Talent Admissions (“Special 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.

### *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 Admissions 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 Admissions by Exception to less than two percent of all new enrollees over the last several years.

### *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.

**C. SCOPE**

In FY 2019-20, the UC Office of Ethics, Compliance and Audit Services (ECAS) directed all Internal Audit departments at campuses with Undergraduate programs to perform a systemwide audit of Undergraduate Admissions – Phase II.

The review included evaluating the operating effectiveness of internal controls in the following areas:

- 1) Special Talent Admissions
- 2) Admissions by Exception
- 3) Admissions IT systems access
- 4) Student athlete participation

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

UCR A&AS 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.

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
- Special Talent Admissions
- Admissions by Exception
- Admissions IT system access
- Monitoring student athletes' participation in athletic programs

These opportunities for improvements in this report will be addressed as part of Phase I and Phase II Audit recommendations (Appendix A).

**1. Preliminary Assessment**

Our preliminary assessment included an overview of the following areas:

- General Overview and Risk Assessment
- General Controls Environment
- Business Processes
- Information and Communication Systems

## **2. Procedures**

### **1) Special Talent Admissions**

- a) We conducted walkthroughs of the processes of the Admissions Office and the Athletics Department in Admissions Audit Phase I and continued in Phase II to obtain an understanding of how UCR identifies and tracks applicants that departments recommend on the basis of special talent.
- b) We conducted walkthroughs of the processes of the Admissions Office and the Athletics Department in Admissions Audit Phase I and continued in Phase II to obtain an understanding of the existing documentation and approval requirements for each type of special talent recommendation and approval requirements.
- c) We obtained the population of applicants admitted under the special talent admissions process during the audit period, including, if available, those who were only flagged for consideration but not admitted, as well as those who were admitted. We then judgmentally selected a sample of 25 for further review and determined whether:
  - Required approvals are documented.
  - Documentation of special talent exists.
  - The source of the documentation appears to be legitimate, credible and supports the special talent.

### **2) Admissions by Exception**

- a) We conducted walkthroughs to obtain an understanding of the categories of acceptable rationale for Admissions by Exception operation and also understanding the existing requirements.
- b) We obtained the population of applicants considered under Admissions by Exception during the audit period including, if available those who were only flagged for consideration but not admitted as well as those who were admitted. We then judgmentally selected a sample of 25 for further review including the following:
  - Confirmed documentation of the rationale for identification of applicants for consideration under the Admissions by Exception policy.
  - Determined if the rationale identified for the applicant meets criteria as defined in campus policy or BOARS guidance.
  - Confirmed that the evaluation of applications is documented.



- Confirmed that individuals who identified candidates for consideration under Admissions by Exception did not make final admissions decisions.
- Determined whether the campus obtained any required approvals.

### **3) Admissions IT System Access**

We evaluated user access for the Admissions IT system by performing the following:

- a) Identified and described the process to implement user access changes.
- b) Determined whether sufficient controls exist to ensure that those changes are appropriate and properly approved.
- c) Determined whether the campus periodically reviews the appropriateness of authorized user access.
- d) Identified and obtained the population of authorized users of all Admissions related IT systems during the audit period and their levels of access such as differences in read and write permissions. We then judgmentally selected a sample of 25 authorized users to perform the following:
  - i. Reviewed documentation to determine whether their access was appropriately authorized.
  - ii. Reviewed job descriptions and determined if the level of authorized user access is aligned with their respective job responsibilities.

### **4) Student Athlete Participation**

- a) We conducted walkthroughs to obtain an understanding of existing requirements for minimum student athlete participation for the period of review.
- b) We evaluated and determined whether existing controls are sufficient to ensure that records supporting ongoing participation in Athletics are kept current throughout the season.
- c) We reviewed internal controls over the information such as any required approvals to assess the reliability of participation documentation.
- d) We obtained the population of non-scholarship student athletes recommended for admissions by the Athletics department during the audit period. We then judgmentally selected a sample of 25 to perform the following testing:
  - Reviewed routinely updated participation records such as practice logs or active rosters to determine whether athletes participated in their sport for one year or met minimum participation requirement.

- Determined the reasons such as injury, coach removed from team due to performance, etc.

#### **D. INTERNAL CONTROLS AND COMPLIANCE**

As part of the review, internal controls were examined within the scope of the audit.

Internal control is a process designed to provide reasonable, but not absolute, assurance regarding the achievement of objectives in the following categories:

- Effectiveness and efficiency of operations
- Reliability of financial reporting
- Compliance with applicable laws and regulations

Audit procedures were performed from October 1, 2019 to November 15, 2019. Accordingly, this evaluation of internal controls is based on our knowledge as of that time and should be read with that understanding.

### **III. OBSERVATIONS, COMMENTS, AND CORRECTIVE ACTION PLANS**

#### **A. Special Talent Admissions**

Internal controls over Special Talent Admissions are inadequate and ineffective. Specifically, we observed the following:

- Required approvals for all 25 sampled applicants were not documented.
- The documentation for special talent did not exist for all 25 sampled applicants.
- We could not determine if the source documents were legitimate due to lack of supporting documentation for all 25 sampled applicants.

In addition, candidates for Special Talent Admissions with the exception of those recommended by the Athletics department are not identified and tracked. Therefore, we were unable to identify the total population of Special Talent Admissions. This condition makes it difficult for the University to accurately report to stakeholders the number and composition of Special Talent Admissions.

#### **Prior Recommendations (from Phase I 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 II 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 I 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.

### **Management Corrective Action Plan for Prior Recommendations**

Refer to Appendix B at the end of this report including Expected Implementation Dates.

### **Management Corrective Action Plan for Current Recommendations**

Refer to Appendix A, Section C at the end of this report including Expected Implementation Dates.

## **B. Admissions by Exception**

Internal controls over Admissions by Exception are inadequate and ineffective. Specifically we observed the following:

- The rationale for consideration under Admissions by Exception policy for all 25 sampled applicants was not adequately and consistently documented. Specifically, documentation to support Admissions by Exception decisions was either not available or inconsistent with the BOARS guidelines, or Admissions by Exception codes were too general to identify exception reasons.
- There was no clear documentation or indication within its Admissions system to identify who recommended or approved the designation. The campus lacked local guidelines to identify individuals responsible for recommending and approving Admissions by Exception.
- We confirmed that the evaluation of applications for all 25 sampled students is documented. However, the comments in the student evaluation applications could be enhanced.

### **Prior Recommendations (from Phase I 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 Admissions 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 Admissions 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:**

Below is an additional recommendation to address the issues noted in the current Phase II Audit:

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.”

### **Management Corrective Action Plan for Prior Recommendations**

Refer to Appendix B at the end of this report including Expected Implementation Dates.

### **Management Corrective Action Plan for Current Recommendations**

Refer to Appendix A, Section D at the end of this report including Expected Implementation Dates.

## **C. Admissions IT Systems Access**

Internal controls over Admissions IT System Access are inadequate and ineffective. We observed the following:

- The campus did not periodically review IT system access rights to verify that they appropriately aligned with users’ job responsibilities for 10 of 25 sampled authorized users.
- Due to the lack of supporting documentation, we were unable to determine if IT Systems access for five of 25 sampled users was appropriately authorized.

- The campus does not periodically review the appropriateness of authorized user access.

### **Prior Recommendations (from Phase I Audit dated June 20, 2019):**

Campuses should:

- 6.1 Implement controls to periodically review admissions IT systems 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 II Audit:

Campuses should:

- E.1 Update Admissions IT systems user access to ensure that access is appropriately aligned with job responsibilities.
- E.2 Document Admissions IT systems 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.

### **Management Corrective Action Plan for Prior Recommendations**

Refer to Appendix B at the end of this report including Expected Implementation Dates.

### **Management Corrective Action Plan for Current Recommendations**

Refer to Appendix A, Section E at the end of this report including Expected Implementation Dates.

**D. Student Athlete Participation**

We observed that the Athletics department maintained activity logs for all 25 sampled athletes. However, the department did not maintain adequate documentation to support changes in athletic participation status. For example, when athletes leave their sports, coaches do not consistently indicate the reasons for the status changes (i.e. quit, dismissed, transferred, etc.). In addition, the Athletics Director does not consistently approve these forms.

**Prior Recommendations (from Phase I Audit dated June 20, 2019):**

Campuses should:

- 9.1 Establish a policy requiring a minimum of one year of participation in an Athletics 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 II 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.

**Management Corrective Action Plan for Prior Recommendations**

Refer to Appendix B at the end of this report including Expected Implementation Dates.

**Management Corrective Action Plan for Current Recommendations**

Refer to Appendix A, Section F at the end of this report including Expected Implementation Dates.



## Systemwide Audit of Undergraduate Admissions Management Corrective Actions – UCR

Appendix A Note: Only sections, which apply to UCR were included in this Appendix.

Recommendation	Management Corrective Action	Target Date
<p><b>A. Documentation Supporting the Admission Process.</b></p> <p><b>A.1</b> Ensure that any committee charged with making admissions decisions develop a charter that includes, at a minimum, the committee’s:</p> <ul style="list-style-type: none"> <li>• Key objectives or purpose</li> <li>• Authority</li> <li>• Responsibilities</li> <li>• Membership, including term limits and voting privileges</li> <li>• Frequency of meetings</li> <li>• Review criteria</li> <li>• Approval or decision-making process and requirements, including quorum requirements and documentation requirements</li> </ul>	<p>UCR’s “Committee on Undergraduate Admissions Members’ Handbook” and “Special Review Committee Appendix A” from the Senate approved document “Guidelines for Admissions by Exception Supplemental Criteria” outline the committee’s charge and all of the charter objectives outlined in the Phase II Audit A.1 recommendation.</p> <p><b>Responsible:</b> Ashley Araya, Undergraduate Admissions Policy, Compliance, and Training Officer</p>	<p>Closed</p> <p>Note: This section was not part of the scope of this audit but these additional recommendations were addressed from the special talents and A by E testing.</p>
<p><b>A.2</b> Evaluate current retention practices for admissions documentation, including approval documentation, and ensure documented procedures reflect appropriate retention requirements in accordance with the UC Records Retention Schedule. Provide training to the appropriate personnel on records retention requirements</p>	<p>Review current <i>UCR Retention Policy Document</i> and record retention admissions staff training, used to maintain UC Undergraduate Admissions record retention procedures, to identify that local practices are in alignment with retention periods outlined in the UC Records Retention Schedule.</p> <p><b>Responsible:</b> Ashley Araya, Undergraduate Admissions Policy, Compliance, and Training Officer</p>	<p>6/1/2020</p>

## Systemwide Audit of Undergraduate Admissions Management Corrective Actions – UCR

Recommendation	Management Corrective Action	Target Date
<p><b>C. Special Talent Admissions (“Special Admissions”)</b></p> <p><b>C.1</b> 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</p>	<p>MCA is dependent on Systemwide Undergraduate Admissions guidance. Once released UCR will review current practices and policies set in place for Phase I MCAs 3.2-3.6 to determine if new controls will need to be implemented to ensure applicants recommended on the basis of special talent are identified and tracked appropriately.</p> <p><b>Responsible:</b> Ashley Araya, Undergraduate Admissions Policy, Compliance, and Training Officer</p>	<p>6/1/2020</p>
<p><b>C.2</b> Evaluate current retention practices for documentation supporting special talent recommendations and ensure documented procedures reflect appropriate retention requirements in accordance with the UC Records Retention Schedule. Provide training to the appropriate personnel on records retention requirements.</p>	<p>Align local retention record practices for verification of special talent and special talent recommendation forms with recommendations set in A.2, train appropriate personnel regarding new record retention requirements, and update <i>UCR Retention Policy</i> to reflect the UC Record Retention Schedule requirement for these documents.</p> <p><b>Responsible:</b> Ashley Araya, Undergraduate Admissions Policy, Compliance, and Training Officer</p>	<p>6/1/2020</p>

## Systemwide Audit of Undergraduate Admissions Management Corrective Actions – UCR

Recommendation	Management Corrective Action	Target Date
<p><b>D. Admissions by Exception</b></p> <p><i>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.”</i></p>	<p>In alignment with Phase I MCA 4.2 the AxE Internal Procedure Document outlines the controls ensuring accurate classification , identification, and tracking that takes place in support of the Senate approved Guidelines for Admissions by Exception Supplemental Criteria policy document for all students admitted and enrolled under this policy, including student athletes, “disadvantaged” and “other”.</p> <p><b>Responsible:</b> Ashley Araya, Undergraduate Admissions Policy, Compliance, and Training Officer</p>	<p>6/1/2020</p>
<p><b>E. Admissions IT System Access</b></p> <p><b>E.1</b> Update admissions IT system user access to ensure that access is appropriately aligned with job responsibilities.</p>	<p>In alignment with Phase I MCA 6.1 UCR has created the <i>Procedure for Banner SAADCRV User Edit Access</i> that aligns approval for access with job responsibilities outlined in employee job description. User access to Banner SAADCRV will be updated and monitored according to the procedure.</p> <p><b>Responsible:</b> Ashley Araya, Undergraduate Admissions Policy, Compliance, and Training Officer</p>	<p>Closed</p>

## Systemwide Audit of Undergraduate Admissions Management Corrective Actions – UCR

Recommendation	Management Corrective Action	Target Date
<p><b>E.2</b> 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:</p> <ul style="list-style-type: none"> <li>• Documented justification and authorization for user access to admissions IT systems</li> <li>• Maintenance of a list of authorized users and associated privileges</li> </ul>	<p>The “<i>Procedure for Banner SAADCRV User Edit Access</i>” is currently being implemented to meet directives from Phase I MCA 6.1. This documents the process for reporting the list of active users and access type, annual review of users, and approval procedure that requires documented justification and supervisor authorization, for new users, and the procedure for employees leaving UCR or no longer needing access.</p> <p><b>Responsible:</b> Ashley Araya, Undergraduate Admissions Policy, Compliance, and Training Officer</p>	<p>Closed</p>
<p><b>F. Monitoring Student Athletes’ Participation in Athletic Programs</b></p> <p><b>F.1</b> Implement controls, such as required forms, to ensure that reasons for changes in athletic program participation status are clearly documented.</p>	<p>The Athletic Department has implemented controls to ensure that the reasons for changes in athletic participation are clearly documented. A Change in Status form requires a coach to indicate the reason for the change. The coach is to mark the box for the change (i.e., cut, quit, other) along with including a more detailed description of the rationale.</p> <p><b>Responsible:</b> Joshua Smith, Assistant Athletics Director, Compliance Services</p>	<p>Closed</p>

## Systemwide Audit of Undergraduate Admissions Management Corrective Actions – UCR

Recommendation	Management Corrective Action	Target Date
<p><b>G. Admissions Appeal Process</b></p> <p><b>G.1</b> Develop or amend local policies and procedures to address requirements for all appeals decisions. The policies and procedures should include the following:</p> <ul style="list-style-type: none"> <li>• <b>A requirement that</b> all appeal reviews be fully documented, including analyses, recommendations, decisions, and individuals involved.</li> <li>• A requirement that at least two individuals or a committee be involved in the appeals review, and if the final decision is contrary to the initial recommendation, the rationale for the final decision must be documented.</li> </ul>	<p><b>General Appeals:</b> The current UCR appeal process includes fully documenting all appeals, including analyses, recommendations, decisions, including rationale for decisions contrary to initial recommendation, and individuals involved. UCR will restructure the local appeals process to include a second individual in an undergraduate admissions leadership role. Undergraduate Admissions will review established appeal policies and procedures to determine what additional amendments need to be made.</p> <p><b>SRC Appeals:</b> The current SRC appeal process includes fully documenting all appeals, including analyses, recommendations, decisions, including rationale for decisions contrary to initial recommendation, and individuals involved. UCR’s Senate approved Admission by Exception policy, “Guidelines for Admission by Exception Supplemental Criteria,” outlines the requirement for the SRC Committee to review SRC appeals.</p> <p><b>Responsible:</b> Ashley Araya, Undergraduate Admissions Policy, Compliance, and Training Officer</p>	<p>6/1/2020</p> <p>Note: The section was done by UCOP and the related observations are noted in the systemwide final report.</p>

## Systemwide Audit of Undergraduate Admissions Management Corrective Actions – UCR

Appendix B Note: Only sections, which apply to UCR were included in this Appendix.

Recommendation	Management Corrective Action	Target Date
<p>3.2 Clearly identify and track all applicants that departments recommend on the basis of special talent.</p>	<p>Review and update tracking procedures that are currently in place for athletic special talent. Develop similar procedures for special talent applicants outside of athletics.</p> <p><b>Responsible:</b> Deborah Jaurigue, Associate Director, Undergraduate Admissions</p>	<p>Closed Pending Academic Senate Approval</p>
<p>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.</p>	<p>Establish and document minimum requirements for documented verification of special talent for each department in consultation with UCR's Undergraduate Admissions Senate Committee. Research best practice policies currently in place at other universities that UCR could adopt for implementation.</p> <p>Consult with Athletics and other departments (Art Department, Music Department, etc.) to learn of potential sources that can be used to verify special talent of applicants.</p> <p><b>Responsible:</b> Emily Engelschall, Director, Undergraduate Admissions</p>	<p>Closed Pending Academic Senate Approval</p>

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Recommendation	Management Corrective Action	Target Date
<p>3.4 Require a two-step verification process for any recommendation for admission on the basis of special talent that includes the following:</p> <ul style="list-style-type: none"> <li>• The initiator of the recommendation must document and attest, under penalty of disciplinary action, that they have performed an assessment and determined that the level of special talent warrants a recommendation for admission</li> <li>• An individual in a supervisory capacity must approve the recommendation</li> </ul> <p>For athletics, this process could be limited to non-scholarship prospective student athletes.</p>	<p><b>Athletes:</b></p> <p>For all recommendations for admission by athletics on the basis of special talent, add language or create a separate document that requires the initiator (coach) to 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.</p> <p>The Athletic Director will serve as final approval for recommendation for admission for all prospective students (aid or non-scholarship).</p> <p><b>Non-Athletes:</b></p> <p>In consultation with the Academic Senate create a form that the initiator attests to the quality of the special talent. The form must also be signed by the Associate Dean or Dean of the college as a secondary/supervisory approver.</p> <p><b>Responsible:</b> Joshua Smith, Assistant Athletics Director, Compliance Services and Emily Engelschall, Director Undergraduate Admissions</p>	<p>Closed</p>
<p>3.5 For all non-scholarship prospective student athletes recommended for admission by athletics, require that the athletics compliance office verify the qualifications of the recommended applicant, in accordance with the requirements referenced in recommendation 3.3.</p>	<p>Athletic Compliance Office will verify the coach’s assessment of athletic qualifications for all non-scholarship prospective student-athletes in accordance with the requirements in recommendation 3.3. This includes verification of registration with the NCAA Eligibility Center as well as completion of an internet search to verify qualifications while participating on an active high school, prep school, junior college, club team or national team. This process will be followed for all non-scholarship student athletes recommended for admission by athletics.</p> <p><b>Responsible:</b> Joshua Smith, Assistant Athletics Director, Compliance Services</p>	<p>Closed</p>

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Recommendation	Management Corrective Action	Target Date
<p>3.6 Require all admissions decisions for applicants recommended by departments on the basis of special talent to be approved by the admissions director or a member of senior leadership external to the recommending department.</p>	<p>Create a workflow that allows Admissions Director approval, to include documentation of that approval, for final admissions decisions for special talent applicants recommended by departments. This process will be inclusive of all special talent applicants that do not meet campus selection as well as special talent applicants admitted by exception.</p> <p><b>Responsible:</b> Emily Engelschall, Director, Undergraduate Admissions</p>	<p>Closed Pending Academic Senate Approval</p>
<p>4.2 Establish a local campus policy that outlines acceptable rationale and the required evaluation process for admissions by exception. At a minimum, this policy should ensure that an individual who identifies a candidate for admission by exception cannot make the final admission decision.</p>	<p>UCR has a policy in place for recommendation 4.2 as outlined in the Senate approved document <i>“Guidelines for Admission by Exception Supplemental Criteria”</i> document. This document will be reviewed by the Undergraduate Admissions Senate Committee in the fall quarter and if deemed necessary clarifying language will be added to the <i>“Guidelines for Admission by Exception Supplemental Criteria”</i> document.</p> <p>In a separate document Undergraduate Admissions will outline the admissions evaluation process that takes place in support of the <i>“Guidelines for Admissions by Exception Supplemental Criteria”</i> policy document</p> <p><b>Responsible:</b> Emily Engelschall, Director, Undergraduate Admissions</p>	<p>Closed Pending Academic Senate Approval</p>



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Recommendation	Management Corrective Action	Target Date
<p>4.3 Establish controls to ensure that an acceptable rationale for identifying an applicant to be considered for admission by exception is documented for each applicant being considered under the policy.</p>	<p>UCR’s Senate approved Admission by Exception policy, <i>“Guidelines for Admission by Exception Supplemental Criteria”</i>, outlines the rationale and methodology for identifying an application to be considered for admission by exception. Undergraduate Admissions will create a work flow document, that includes the establishment and documentation of controls to document an acceptable identification rationale, for applicants being considered for admission by exception. Additionally, Undergraduate Admissions will review our current guidelines to ensure applicants are being identified based on Senate policy.</p> <p><b>Responsible:</b> Deborah Jaurigue, Associate Director, Undergraduate Admissions</p>	<p>Closed Pending Academic Senate Approval</p>
<p>4.4 Establish local procedures to annually monitor compliance with the campus percentage limits for admissions by exception established by Regental policy.</p>	<p>Admission by exception limits are currently reviewed on an annual basis and reported out to the Undergraduate Admissions Senate Committee by the Director of Undergraduate Admissions. This process will be formalized and documented in consultation with the Undergraduate Senate Committee.</p> <p><b>Responsible:</b> Emily Engelschall, Director, Undergraduate Admissions</p>	<p>Closed Pending Academic Senate Approval</p>
<p>5.2 Provide regular training to all individuals who are involved in reviewing admissions applications or making admissions decisions, including external readers, regarding conflicts of interest and associated requirements. This training should include, but not be limited to, the definition of improper influence and provide examples of improper influence in the context of admissions.</p>	<p>Prepare and deliver conflict of interest training session to all individuals involved in reviewing applications annually. During training provide specific examples/scenarios of circumstances that do and do not constitute a conflict of interest in the application review process.</p> <p>UCR does not currently employ external readers; therefore that portion of recommendation 5.2 does not apply to UCR.</p> <p><b>Responsible:</b> Emily Engelschall, Director, Undergraduate Admissions</p>	<p>Closed</p>

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Recommendation	Management Corrective Action	Target Date
<p>6.1 Implement controls to periodically review admissions IT system access to ensure that the level of access is aligned with job responsibilities including, at a minimum, a review of user access before each annual admissions cycle begins.</p>	<p>Meeting is scheduled on 7/15/19 with UCR departments that have a need to use the Banner admission decision screen (SAADCRV). In the meeting the following topics will be discussed:</p> <ol style="list-style-type: none"> <li>1. Define and document the business need based on job responsibilities for UCR employees to have edit access to SAADCRV</li> <li>2. Review of the current Banner Access roles that include edit access to SAADCRV</li> <li>3. Define and document the approval process for granting future edit access to SAADCRV</li> </ol> <p>Once 1-3 are defined and documented, those UCR staff members with no business need to have edit access to SAADCRV, will have access removed by ITS. Access to the SAADCRV form within UCR's student information system will be reviewed on an annual basis by Undergraduate Admissions.</p> <p><b>Responsible:</b> Emily Engelschall, Director, Undergraduate Admissions</p>	<p>Closed</p>
<p>6.2 Implement controls to log activity in admissions IT systems and periodically review high-risk changes, such as admissions decision changes, for appropriateness. Campuses should define high-risk changes to review and monitor.</p>	<p>Identify circumstances that should be defined as high-risk changes to an applicant record within Banner. In consultation with ITS develop parameters for a report that is run on a weekly basis that identifies when outlined high-risk changes occur.</p> <p>Admission Director and/or Associate Director will review all cases that hit developed report for appropriateness.</p> <p><b>Responsible:</b> Emily Engelschall, Director, Undergraduate Admissions</p>	<p>Closed</p>

## Systemwide Audit of Undergraduate Admissions Management Corrective Actions – UCR

Recommendation	Management Corrective Action	Target Date
<p>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:</p> <ul style="list-style-type: none"> <li>• Any exceptions to this requirement</li> <li>• Approval requirements for any exceptions to the policy</li> <li>• Consequences for violating the policy</li> </ul>	<p>Develop policy, exceptions, approval process for exceptions, and consequences for policy violation for recommendation 9.1 in consultation with UCR's Undergraduate Admissions Senate Committee. Research best practice policies currently in place at other universities that UCR could adopt for implementation. Policy implementation will cover non-scholarship athletes admitted who do not meet campus selection or who are admitted by exception.</p> <p><b>Responsible:</b> Emily Engelschall, Director, Undergraduate Admissions</p>	<p>Closed</p>
<p>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.</p>	<p>Once policy is finalized as a result of recommendation 9.1, develop a contract that outlines requirements of minimum athletic participation and consequences of not meeting requirements that non-scholarship athletes who athletics recommended for admission are required to sign. Research any contracts currently in place at other universities that UCR could adopt for implementation.</p> <p>Develop procedures and retention policies for storing signed documents in Banner Document Management system as well as coding admitted students athletes appropriate in Banner who have a signed contract on file.</p> <p><b>Responsible:</b> Emily Engelschall, Director, Undergraduate Admissions</p>	<p>Closed</p>

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Recommendation	Management Corrective Action	Target Date
<p>9.3 Establish controls to ensure records supporting ongoing participation in athletics are kept current throughout the season.</p>	<p>Coaches are required to report roster changes within 48 hours. This includes any time a current student-athlete quits the team or is cut/dismissed or withdraws (among other reasons). The Director of Compliance will review the CAi roster on a regular (bi-weekly) basis to ensure records are kept current. Coaches are also required to submit weekly practice logs indicating participation for each student-athlete. These logs are approved by compliance twice, once before being sent to the student-athletes for review and again after a percentage of athletes have reviewed their hours.</p> <p><b>Responsible:</b> Joshua Smith, Assistant Athletics Director, Compliance Services</p>	<p>Closed</p>
<p>9.4 Establish controls to independently monitor compliance with the one-year minimum participation requirement for non-scholarship student athletes recommended for admission.</p>	<p>In partnership with Athletics, develop a workflow and/or quarterly report to identify athletes who did not meet campus selection and were admitted, to ensure that the athlete has participated in their sport for one year. Consult with UC campuses that have this control already in place to learn any best practices that have potential for implementation at UCR. Following implementation, monitoring of compliance will be independent of Athletics.</p> <p><b>Responsible:</b> Deborah Jaurigue, Associate Director, Undergraduate Admissions</p>	<p>Closed</p>
<p>9.5 Provide regular training to athletics staff on the minimum participation policy requirements.</p>	<p>Training will be provided annually at the beginning of the academic year in either the fall staff meeting or in the first regular meeting with Compliance.</p> <p><b>Responsible:</b> Joshua Smith, Assistant Athletics Director, Compliance Services</p>	<p>Closed</p>