

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

**Graduate Admissions
Donations Review**

Project #21-082

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University of California
San Francisco

Audit & Advisory Services

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SUBJECT: Donations Review

As a planned internal audit for Fiscal Year 2021, Audit and Advisory Services (“A&AS”) conducted a retrospective review of donations to UCSF to assess graduate admissions decisions that could have been influenced by these donations.

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

Our review was completed, and the preliminary draft report was provided to department management in June 2021. Management provided us their final comments and responses to our process improvement opportunities in June 2021. As there are no corrective actions, follow up will not be required.

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

Sincerely,

A handwritten signature in black ink, appearing to read 'Irene McGlynn'.

Irene McGlynn
Chief Audit Officer
UCSF Audit and Advisory Services



EXECUTIVE SUMMARY

I. BACKGROUND

In response to recent nationwide issues involving third parties exploiting vulnerabilities in college admissions processes, a retrospective review of donations to UCSF was completed to identify graduate admissions decisions that could have been influenced by these donations.

Below shows statistics of UCSF applicants in the last four years, January 2017 to December 2020.

Applicant Count	Description	Adm Group	Admission Code
5152	Registered	ADMITTED	41
2154	Decline	ADMITTED	27
54625	Reject / Deny	Not Admitted	26
61,931	Grand Total		

II. AUDIT PURPOSE AND SCOPE

The purpose of this review was to determine if donations to UCSF could have had any influence on the graduate admissions decision process for the School of Medicine (SOM), School of Dentistry (SOD), School of Nursing (SON), School of Pharmacy (SOP) and the Graduate Division. The scope of the review included cumulative donations matches of \$10,000 or more received by UCSF from January 1, 2017 through December 2020.

To conduct this review, the following procedures were performed:

- a. Obtained a dataset of donations received during the audit period.
- b. Obtained a dataset of applications for graduate admission submitted during the audit period.
- c. 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 and phone numbers. The analysis was limited to cumulative matching donations of \$10,000 or more received during the audit period.
- d. 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 all or a subset of the following:
 - o Dollar amount of the donation
 - o Pattern or timing of giving
 - o Applicants admitted by exception

- Applicants’ undergraduate academic performance and Exams scores for graduate admissions

The review did not include validation of Foundation’s or the Schools’ Admission office work email communications or interviews with donors as these steps are more aligned with an investigation.

Work performed was limited to the specific activities and procedures described above. As such, this report is not intended to provide an assessment of compliance beyond those areas specifically reviewed. Fieldwork was completed in April 2021.

III. SUMMARY

Assessment of the data analysis indicated a low number of cases of donation matches with applicants admitted: less than 1% matches met the donation threshold of \$10K or more. The donation patterns did not suggest that this influenced admission given that there were higher number of applicants with matched donations that were not admitted – see table below:

	Jan 2017 - Dec 2020		
Admission Status	Count of Donation Matches	Sum of Donations	Count of Cumulative Donations \$10K or more
Admitted	177	\$8,861,672*	7
Admitted, applicant declined	21	\$7,703	0
Not Admitted	250	\$12,679,184	20

**One donor accounted for accumulated donations of \$4M*

Review of the admission files for the seven applicants with donation matches over \$10K did not appear to show any evidence of the donation influence on the admission decision-making. Additionally, we found no donation matches with applicants admitted by exception. Also, the admissions acceptance is based on committee members’ review.

Opportunities for improvements in the admission process for School of Medicine were identified. Given that School of Medicine makes up the largest student populations population, improvement opportunities are recommended to strengthen its admission process to ensure greater consistency in the evaluation of applicants , documenting non-consensus admissions decisions and implementing procedures to reduce the potential impact and risks of unconscious bias. Further detail can be found in Section IV of the report.

IV. OPPORTUNITIES FOR IMPROVEMENTS

No.	Observation	Risk/Effect	Recommendation
1	<p><i>SOM’s admissions procedures could be enhanced by ensuring that there is sufficient documentation of applicant’s evaluation and management of non-consensus admissions to demonstrate consistency and fairness in admissions decisions.</i></p> <p>A. Evaluation Criteria: SOM uses a holistic approach for evaluation of applicants which includes an assessment of metrics (e.g. grades), attributes (e.g. gender identity) and experiences (e.g. distance traveled) to arrive at an evaluation. However, in our review of applicant evaluations, we noted a lack of sufficient documentation of the reviewer’s assessment, making it difficult to determine the evaluation criteria used and the consistency in the evaluation. We noted one case where a committee member recommended “reject” with reason as “not competitive enough” while a different member recommended “accept” stating “great applicant” but it’s not clear from the documentation in the applicant’s file on what evaluation attributes each member was basing their assessment on.</p> <p>Other schools have specific criteria evaluated by the reviewers which demonstrates better consistency in the assessment.</p> <p>B. Non-Consensus Applicant Review: Non-consensus situations arise when an applicant is reviewed by multiple parties but there is no consensus (i.e. majority agreement) on the recommendation for admission, rejection or alternate.</p>	<p>Maintaining adequate documentation of application evaluations including clear assessment of all evaluation criteria helps support admissions decisions and serve as a basis to demonstrate adherence to policy requirements, including demonstrating the holistic review process.</p> <p>Lack of evidence to support non-consensus reviews and admissions may potentially lead to perceived bias or influence in the decision-making process.</p>	<p>a) SOM admissions’ policies and procedures should define minimum documentation requirements to demonstrate the evaluation criteria used in the assessment of the application to ensure consistency and fairness.</p> <p>b) While it is challenging for all non-consensus applicants to be reviewed by the full committee due to volume and bandwidth, SOM admissions should demonstrate that non-consensus applicants are appropriately reviewed and the basis (including documentation of inquiries with pod of committee members) of the decision by Associate Dean to not proceed for full committee review to be documented. Admission procedures to be updated to reflect this practice.</p>

No.	Observation	Risk/Effect	Recommendation
	<p>Current procedure states that non-consensus during first round of review within each “pod” of committee members¹ will be reviewed by the full committee. However, the four non-consensus applicants in our samples were reviewed solely by the Associate Dean with a decision to accept.</p> <p>Discussions with Admissions Management highlighted that the practice is for the Associate Dean to review the files and performs a preliminary determination about which files will be reviewed by the entire committee. The pod of committee members is queried about whether they agree or disagree with the overall decision by the Associate Dean to ultimately determine which files will undergo full committee review. Disagreements are brought to full committee. However, evidence of input gathered from reviewers by the Associate Dean were not retained to demonstrate that the stated process was followed.</p>		

¹ Each application is reviewed by 2-3 members within each pod.

No.	Observation	Risk/Effect	Recommendation
2.	<p><i>SOM should provide unconscious bias training to promote consistent and fair admissions decisions process.</i></p> <p>Review of admissions files for four non-consensus applicants highlighted that there may be potential risks of unconscious bias influence in the admissions process based on recognition of the applicant’s last name and association with UCSF and/or parent’s status.</p> <ul style="list-style-type: none"> - The admissions reviewers had notations in the admissions file such as “parent is vice chancellor of research”, “applicant had interned with distinguished professor”, etc. - For one applicant, the reviewer had recognized the parents’ name with high economic status and referenced this to another reviewer, who now had knowledge of the same social status. - Three other applicants had parents that work at UCSF and the reviewers commented on this and documented as part of their assessment. - We noted that one of these applicants did not have competitive academic scores, but the holistic review included her clinical shadowing experience at UCSF and exposure to medicine through mentoring by one of the parents who is a senior faculty member at UCSF. <p>The SOM Admissions’ management indicated that it frequently discusses implicit/unconscious bias during active committee review meetings. Additionally, a retreat held in September 2020 included implicit/unconscious bias as well as diversity, equity and inclusion (DEI) training with special emphasis on admissions review.</p>	<p>Insufficient awareness of and/or mechanisms to reduce unconscious bias can impact decision-making in the review process and may create conditions of unfairness.</p>	<p>a) SOM Admissions to continue its efforts on ensuring that all review committee members and interviewers undergo UCSF’s unconscious bias training to ensure fairness to all applicants regardless of economic status and UCSF affiliation. Record of the training should be maintained.</p> <p>b) SOM admissions to determine if it’s feasible and to weigh cost/benefits on hiding applicant’s demographic information specifically parent’s names to reduce risks of unconscious bias (although it is recognized that this information may be revealed during the interview process).</p>