DEPARTMENT OF INTERCOLLEGIATE ATHLETICS

ACADEMIC DIVISION

AUDIT REPORT #19-4001

Audit & Advisory Services

October 2020

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# Background

In accordance with the UCLA fiscal year 2018-19 audit plan, Audit & Advisory Services (A&AS) conducted a review of Academic & Student Services (AS2), the Academic Division unit within the Department of Intercollegiate Athletics (DIA).

AS2 supports the unique needs of each student-athlete by providing strategic services and programming in the areas of academic counseling, academic support, student services, and student-athlete development. AS2 strives to empower student-athletes to maximize their educational experience as they pursue their academic and personal goals.

AS2 includes the following areas:

*Academic Counseling*

AS2 academic counseling provides academic advice and direction for assigned student-athletes. Each team is assigned an academic counselor that has expertise in the areas of program planning, academic difficulty counseling, petitioning degree requirements, and major selection. The goal of the academic counseling program is to help student-athletes develop their decision-making skills so that they can make appropriate academic choices and take responsibility for those choices.

*Academic Support Services*

AS2 academic support services develops academic support plans to meet the individual academic needs of student-athletes based on class schedules, past academic performance, and academic goals and interests. Academic support plans may include sessions with a learning specialist, an academic mentor, and peer learning facilitators (PLFs). The goal of AS2 academic support services is to guide student-athletes in their learning process so that they may gain the skills necessary to become self-sufficient, independent learners.

*Student Services*

AS2 student services provides student-athletes travel letters and assistance with exam conflicts during competition travel. The purpose of the travel letter is to make professors and teaching assistants aware of any absences due to University/NCAA/Pac-12 sanctioned events.

*Student-Athlete Development*

The student-athlete development program strives to enhance the student-athlete experience within the University setting by coordinating educational programs that address personal growth, leadership, professional development, and community service. The goal of the student-athlete development program is to assist student-athletes with their transition to college, provide opportunities to enhance their college experience, and support the development of a well-balanced lifestyle.

The Associate Athletic Director, Academic & Student Services, and the Director of Student-Athlete Counseling & Athletics Peer Learning oversee AS2, and both have dual reporting to the Senior Associate Athletic Director/Senior Woman Administrator and the Dean, Division of Undergraduate Education.

Purpose and Scope

The primary purpose of the review was to ensure that organizational structure and controls, and the related systems and procedures surrounding AS2’s operations are conducive to accomplishing University’s business objectives. The secondary purpose of the review was to evaluate the adequacy and efficiency of internal controls. Where applicable, compliance with University and departmental policies and procedures was also evaluated.

The scope of the audit focused on controls surrounding the following activities:

* Academic Counseling
* Academic Support Services
* Student Support Services
* Student-Athlete Development

The review was conducted in conformance with the *International Standards for the Professional Practice of Internal Auditing* and included tests and other procedures considered necessary to achieve the audit purpose. Interviews were conducted with AS2 management and staff, and various other financial and administrative documents were examined.

# Summary Opinion

Based on the results of the work performed within the scope of the audit, the AS2’s overall organizational structure and controls are generally conducive to help achieve their business objectives. However, controls and business practices could be further strengthened by implementing the following:

*Academic Counseling*

* The enrollment audit policy should be updated to reflect the current business needs of the operation which includes the instances of enrollment audits needed to be performed and by when, the threshold rate of when a course needs to be further evaluated and whether the rate is for a course’s current student enrollment or total allowable enrollment. Furthermore, management should perform these reviews according to policy and consider generating these reports automatically rather than manually to streamline the process.
* Management should implement a procedure that would check for necessary approvals and ensure relevant documents are completed prior to processing the DIA AS2 Contract Course Verification Form. Additionally, management should update the DIA AS2 Contract Course Verification Form to include the course name, number, and term.
* A process should be implemented to log student athlete grade changes and follow-up on instances where an instructor does not respond. Additionally, the FAR should maintain records of emails sent to preserve an audit trail of reaching out to instructors.
* Management should remind individuals to complete the UCLA DIA FERPA Consent Form. Additionally, management should determine whether individuals listed still need access and if so, ensure that individuals meet the FERPA training requirement. Additionally, FERPA training should be tracked to ensure that completion is timely.

*Academic Support Services*

* Acknowledgments should be obtained from PLFs stating that they will abide by rules, regulations, and bylaws. Additionally, management should implement a check-in system to monitor student-athlete attendance.
* Management should maintain a record of mentors that attend training and have mentors acknowledge that they received the policy manual and agree to abide by the policy.

*Student Support Services*

* The Exam Proctoring sheet and the Exam Proctoring Envelope should include the University Identification Number (UID) of the student athlete. The Exam Proctoring Guidelines that are on the exam proctoring sheet should include checking the student's athlete's UID to ensure the correct student is taking the exam and exam proctors should sign the Exam Proctoring Confidentiality Integrity Agreements after proctoring an exam. Management should also ensure that the contact information on the Exam Delivery Receipt is filled out consistently and completely.

*Student-Athlete Development*

* Management should consider adding an additional career employee to the UCLA Student-Athlete Development Program. The success of the program is currently solely contingent on the Director of Student-Athlete Development, making it susceptible to risk if turnover would occur.

The results of the audit and corresponding recommendations are detailed in the following section of the report.

# Audit Results and Recommendations

Academic Counseling

Procedures relating to the enrollment audit process, contract courses, grade changes, and the Family Educational Rights & Privacy Act of 1974 (FERPA) were reviewed to ensure that proper internal controls are established and operating as designed.

1. Enrollment Audit Process

A&AS conducted meetings with management to gain an understanding of the enrollment audit process. Management noted that AS2 conducts a quarterly enrollment audit to evaluate the percentage of student-athletes enrolled in each course. Courses with a certain student-athlete ratio are evaluated individually based on student-athlete enrollment, type of course (i.e. lecture, seminar, and discussion), university requirement, general education requirement, and historical grade information.

A judgmental sample of six quarters was selected to verify whether audits were performed quarterly, as required by the enrollment audit policy. Additionally, a judgmental sample of 20 courses that had a student-athlete enrollment of 20% or higher was selected to verify whether courses were properly evaluated and whether further action was taken when warranted.

A review of the Fall 2017, Winter 2018, Spring 2018, Fall 2018, Winter 2019, and Spring 2019 quarters revealed that the enrollment audit was not always performed according to policy. Specifically, the policy indicated that the enrollment audit was to be performed three times in a quarter at a specific time. However, our review showed that it was performed once per quarter during an inconsistent time period for the Fall 2017, Winter 2018, Fall 2018, and Winter 2019 quarters. Additionally, discussion with management revealed that an enrollment audit was not performed for Spring 2018 and Spring 2019 quarters.

Furthermore, a review of the 20 courses that had a student-athlete enrollment above 20% disclosed the following:

* 5 of the 20 courses reviewed had a student-athlete rate above 20%; however, further action was not taken as required by the policy. Of the five noted, three were above the 20% rate, however, below 30%. Discussion with management revealed that management used a 30% threshold instead of the 20% threshold noted in the policy.
* The policy was unclear on whether the rate was for the course’s current student enrollment or total allowable enrollment.

Recommendation: Management should update the enrollment audit policy to reflect the current business needs of the operation which include the instances of enrollment audits needed to be performed and by when, the threshold rate of when a course needs to be further evaluated and whether the rate is for a course’s current student enrollment or total allowable enrollment. Furthermore, management should perform these reviews according to policy and consider generating these reports automatically rather than manually to streamline the process.

Response: Management will update the enrollment audit policy to reflect the current business needs of the operation, including specifying the enrollment audit deadlines and threshold. The expected completion date for the policy revision and implementation is January 2021.

Management will explore generating applicable reports automatically rather than manually to streamline the process. Management will partner with the DIA IT office in order to fulfill this recommendation. The expected completion date is contingent upon IT support. Management will explore options with DIA Information Technology (IT) this Fall 2020 with an anticipated implementation of June 2021.

1. Contract Courses

A&AS conducted meetings with management to gain an understanding of contract courses. Contract courses enable students to work with individual faculty members for various purposes, such as community or corporate internships, research apprenticeships, individual studies, honors research, or directed research.

A&AS obtained a listing of contract courses from the 2014-2018 calendar years and based on conversations with management, the report was filtered for students with a code A (active), and M (medically retired). Data analytics were applied to identify trends in course enrollment. Based on the test work performed, 142 contract courses were taken by active or medically retired student-athletes during the 2014-2018 calendar years. The majority of the courses were taken by the football (24%), and Track (16%) athletic programs. A total of 59 instructors provided contract courses in the areas of internships, directed research, individual studies, apprenticeship, and special study.

A judgmental sample of ten contract courses was selected to verify that they followed AS2 policy.

A review of the ten contract courses revealed the following:

* In seven instances, the course contract on file at AS2 was not signed by the course instructor.
* In five instances, a DIA AS2 Contract Course Verification Form was not on file. Management stated that these forms could have been misfiled.

Additionally when reviewing the DIA AS2 Contract Course Verification Form we noted that the form did not include the course name, number, and term as additional fields.

Recommendation: Management should implement a procedure that would check for necessary approvals and ensure relevant documents are completed prior to processing the DIA AS2 Contract Course Verification Form. Additionally, management should update the DIA AS2 Contract Course Verification Form to include the course name, number, and term.

Response: Management will update the policy to reflect current University operations. The expected completion date for the policy update is January 2021, although management will continue to monitor contract course enrollment this Fall 2020.

Management will update the DIA AS2 Contract Course Verification Form to include the course name, number, and term. The expected completion date for updating this form is October 2020.

1. Grade Changes

A&AS held meetings with management to gain an understanding of grade changes for student athletes. AS2’s policy requires that the Faculty Athletics Representative (FAR) email the instructor when a grade change request for a student athlete is submitted.

The purpose of the email is to confirm that:

* The instructor was the one to request the grade change.
* No one from DIA contacted the instructor to request the grade change.
* The grade change was done on the same basis as would be done for any other non-athlete student in their course.

A judgmental sample of 12 grade changes was selected to verify that they followed AS2 policy.

A review of the 12 grade changes selected revealed that in all but one instance grade changes followed AS2 policy. In the one instance noted, management indicated that the FAR sent an email to the instructor. However, no record was maintained since the FAR deletes emails from the inbox and outbox once an email is sent or received. Additionally, we noted that AS2 did not have a process to follow-up on instances where the instructor does respond.

Recommendation: Management should implement a process to log student athlete grade changes and follow-up on instances where an instructor does not respond. Additionally, the FAR should maintain records of emails sent to preserve an audit trail of reaching out to instructors.

Response: Management implemented a process to log student-athlete grade changes this Summer 2020 and will continue this process in future terms. The FAR currently maintains records of instructor email outreach.

1. Family Educational Rights & Privacy Act of 1974 (FERPA)

A judgmental sample of 15 student-athletes from various sports teams was selected to verify that student-athletes completed the FERPA written permission consent form. Additionally, A&AS contacted management to obtain copies of communications sent to coaches, staff, and team personnel regarding each student-athlete’s consent decision.

Based on the review of 15 student-athletes from the October 2018 active roster, only five had completed a UCLA DIA FERPA Consent Form within their Teamworks System profile, a collaboration platform used by DIA. Eight student-athletes did not have a completed UCLA DIA Consent Form within their Teamworks System profile, and the remaining two individuals were no longer student-athletes as of November 2018. Further review of the UCLA DIA FERPA Consent Reporting done by the Associate Director of Academic & Student Services revealed that 213 of 647 or 33% of student-athletes either did not complete a UCLA DIA FERPA Consent Form or did not complete it correctly. A&AS was not able to determine the exact number of student-athletes that did not complete the UCLA DIA FERPA Consent Form versus the number of individuals that did not complete it correctly because reporting information was combined.

Management stated that Teamworks System was leveraged to assist in the completion of and as a repository for the UCLA DIA FERPA Consent Form for the 2018-19 Fiscal Year. However, the low completion rate was attributed to the consent form not being user-friendly and difficulties encountered with the integration of the form within the Teamworks System. It is UCLA DIA business practice that the department does not have consent to release student-athlete information if a UCLA DIA FERPA Consent Form is not completed by a student-athlete.

Additionally, A&AS contacted Student Affairs IT Support to verify that the listing of UCLA DIA staff with student records and data access have completed the FERPA training.

Based on the review of the FERPA training completion status provided by UCLA Student Affairs IT, 19 UCLA DIA employees have access to the ZFERPA function, which is access to student records and data in the system. However, only three employees have properly completed the FERPA training. Seven of the 19 employees have not retaken the FERPA training. UCLA Student Affairs IT has no record of the remaining nine employees ever taking the FERPA training. Follow-up with UCLA Student Affairs IT revealed that FERPA quiz completion records were only maintained from February 2009; however, employees are required to retake the FERPA training every two years in order to continue access to student data. Since employees are not notified when their FERPA training has lapsed, and access is not automatically terminated, it is pertinent that DIA Departmental Security Administrators (DSAs) track FERPA Training for their employees.

Recommendation: Management should remind individuals to complete the UCLA DIA FERPA Consent Form. Additionally, management should determine whether individuals listed still need access and if so, ensure that individuals meet the FERPA training requirement. Additionally, FERPA training should be tracked to ensure that completion is timely.

Response: AS2 management has provided DIA Compliance with the recommendations mentioned in this report, as DIA Compliance oversees the student-athlete FERPA education and consent form process. AS2 management and DIA Compliance affirm the recommendation to continue to educate student-athletes on FERPA policy, procedures and the student-athlete FERPA form. DIA Compliance will continue to educate student-athletes on FERPA via annual team-based DIA Compliance meetings and in relevant interactions.

DIA Human Resources and Audit & Advisory Services have collaborated to access the university-required documents/links for FERPA trainings and to collect responses. This is an ongoing project and corrective action is underway with an implementation date of June 2021, although management anticipates that training and monitoring will be implemented at an earlier date during the 2020-21 academic year.

Academic Support Services

Procedures relating to the peer learning facilitator (PLF) and academic mentor programs were reviewed to ensure that proper internal controls are established and operating as designed.

1. Peer Learning Facilitators

A&AS met with management to gain an understanding of the PLF program and to determine whether controls surrounding the training of PLFs are adequate.

A roster list of Athletics PLFs and sign-in sheets for PLF training was obtained. Testing was performed on the sign-in sheets and rosters to verify that active PLFs on the roster sheet for Fall 2018, Winter 2019, and Spring 2019 quarter attended the required trainings.

Review of the supporting documents and discussions with management shows that the PLFs are completing their required trainings. AS2 requires that PLFs attend their mandatory training at the beginning of the Fall academic quarters. PLF supervisors lead the training meetings. New PLFs are required to attend 2 days of training while returning PLFs are required to attend the 2nd day. PLFs that also teach English composition writing are required to attend an additional 3rd day. Additional training is required for PLFs in the Winter and Spring academic quarters as well. For PLFs that are hired outside of the mandatory training dates, training is administered on dates outside of the training date range. All trainings are tracked with a sign-in log, which has the name, date, and signature of the PLF attending the training. Although training includes UCLA rules and regulations and NCAA Bylaws, PLFs are not required to sign a document acknowledging that they will abide by the rules, regulations, and bylaws.

A&AS also met with management to determine that controls surrounding learning materials used by PLFs are adequate. Based on conversations with management, controls surrounding materials used by PLFs appear to be reasonable. UCLA Peer Learning maintains an inventory of textbooks. The textbooks are maintained in a locked receptacle, and access is restricted to Peer Learning Staff. Management also maintains an inventory listing. A PLF Book Request Form is required to check out a textbook. An inventory count of textbooks is also conducted periodically.

During discussion with management, it was noted that peer learning currently does not have a check-in system to monitor student-athlete arrival and departure time, attendance, or scheduling.

Recommendation: Management should obtain acknowledgments from PLFs stating that they will abide by the rules, regulations, and bylaws. Additionally, management should implement a check-in system to monitor student-athlete attendance.

Response: Management will obtain acknowledgments from PLFs stating that they will abide by the rules, regulations, and bylaws via a PLF employment agreement form, which will be implemented October 2020 in conjunction with Fall 2020 PLF initial training.

AS2 management will explore check-in systems to monitor student-athlete attendance. The expected implementation date is January 2021.

1. Academic Mentors

The UCLA Athlete Mentor Program provides a unique opportunity for student-athletes to form meaningful and lasting relationships that extend beyond campus walls. Mentor typically assist with academic guidance, career advice, and personal development. Student-athletes are paired for the academic year, and mentors and mentees connect regularly. Discussion with management revealed that the admission committee evaluates all incoming student-athletes for the mentoring program. Upon the determination of mentoring required for a particular student-athlete, AS2 is notified to enroll the student-athlete in the program.

Discussion with management and review of documents revealed that there were policies, procedures, and training guidelines that have been established for the mentoring program. A&AS also noted training is provided to mentors; however, practices could be improved by maintaining a record of mentors that attended training. Additionally, although a policy manual is provided to mentors, mentors do not sign a form acknowledging they received the policy manual and agree to abide by the policy.

Recommendation: Management should maintain a record of mentors that attend training and have mentors acknowledge that they received the policy manual and agree to abide by the policy.

Response: By October 2020, management will maintain a record of mentors that attend training and have mentors acknowledge that they received the policy manual and agree to abide by the policy.

Student Support Services

Audit & Advisory Services (A&AS) held meetings with management and reviewed written procedures, forms, and documents to determine if controls surrounding travel letters and exam proctoring are adequate.

Student Support Services establishes travel letter and exam proctoring policies, oversees the exam proctoring program, updates all administrative exam proctoring documents and files, manages and coordinates communication with instructors and the DIA Travel office, collects competition travel information from coaches and academic liaisons, and handles the administration of the travel letters and pick up/delivery of the exams.

The purpose of the travel letter is to ensure professors and teaching assistants are aware of any absences due to University/NCAA/Pac-12 sanctioned events. Travel letters are reviewed and approved by the DIA Compliance Division, and signed by College Academic Counselors.

Student-athletes are responsible for taking the travel letter to their professors and teaching assistants. Professors receive the travel letter, which has the student athlete’s name, University Identification (UID) number and the conflicts that they have due to University/NCAA/Pac-12 sanctioned events. The letter states that if there is an exam conflict with the dates and if other arrangements are to be made that it is preferable that the exam be conducted under their supervision, but if they are not able to, and the professor approves, then one of the DIA administrative professionals in Academic & Student Services, Compliance or Sport Supervision (or another institution’s academic staff member) professionals can proctor the exam.

Student-athletes must meet with their professors to receive approval for alternate testing dates/times, which may include before or after the competition or while on the road. The decision is based solely on the professor's discretion. If there are exam conflicts, student-athletes must fill out an "Exam Information Sheet." This form must be turned into the Exam Proctoring Coordinator immediately after the student-athlete has spoken with the professor. Failure to make prior arrangements and submitting the Exam Information Sheet may prohibit a student-athlete from having an alternate testing date/time approved. The Exam Conflict Database Management contains all relevant data from theexam information sheet. Access is properly restricted based on job responsibilities.

Exam proctors sign “Exam Proctoring Confidentiality Integrity Agreements” on an annual basis before the academic year begins. The AS2 Staff Associate ensures that all proctors have signed an agreement and maintains the hard copy and the digital copy of the form.

The instructions that are provided by the professors are typed on the Exam Proctoring Envelope. All Exam Information Sheets, Exam Proctoring Sheets, Exam Proctoring Guidelines, Exam Proctoring Envelope with professor instructions and Exam Delivery Receipts are maintained in secured files.

Although the Department of Intercollegiate Athletics has established written policies and procedures for travel letters and exam proctoring procedures, additional controls are necessary. The following issues were noted:

* The Exam Proctoring Sheet and the Exam Proctoring Envelope do not include the University Identification Number (UID) of the student athlete.
* The Exam Proctoring Guidelines that are on the Exam Proctoring Sheet do not include verifying the student's athlete's UID, nor does it contain language of the importance of academic integrity.
* The Exam Proctoring Envelope includes the name, class, professor and instructions, but does not include the University Identification Number (UID) of the student athlete.
* Review of a sample of Exam Delivery Receipts showed that although the person that had received the completed exam did sign their name, they did not consistently provide all their necessary contact information (printed first and last name, title, and email).

Recommendation: The Exam Proctoring sheet and the Exam Proctoring Envelope should include the University Identification Number (UID) of the student athlete. The Exam Proctoring Guidelines that are on the exam proctoring sheet should include checking the student athlete's UID to ensure the correct student is taking the exam and exam proctors should sign the Exam Proctoring Confidentiality Integrity Agreements after proctoring an exam. Management should also ensure that the contact information on the Exam Delivery Receipt is filled out consistently and completely so that it provides information on the person who was delivered the exam.

Response: Management will update the Exam Proctoring sheet to include the University Identification Number (UID) of the student athlete. Management will also update the Exam Proctoring Guidelines on the exam proctoring sheet to include the student’s UID. Lastly, management will ensure the contact information on the Exam Delivery Receipt is complete. Exam proctors will sign the Exam Proctoring Confidentiality Integrity Agreement prior to and after proctoring an exam. These form updates will be completed effective October 2020, although form utilization is contingent on exam proctoring needs and thus may be implemented at a later date.

Student Athlete Development

The Bruin student-athlete development program strives to enhance the student-athlete experience within the University setting by coordinating educational programs that address personal growth, leadership, professional development, and community service. A&AS met with management to determine the effectiveness of the student-athlete development program for providing student-athletes with professional and personal development, training on transferable skills, and overall personal enhancement.

Based on discussions with management, UCLA Athletics has developed a comprehensive student-athlete development program comprised of the Wooden Academy and other supplemental groups to assist in providing student-athletes personal and professional development at UCLA. The Wooden Academy is initiated every academic year with the Speaker Symposium that features a Bruin Alumni or notable guest. UCLA student-athlete freshman and transfer students are enrolled in the Wooden Academy Legacy Program to obtain a foundation of former UCLA Men’s Basketball Coach John Wooden’s Pyramid of Success. Student-athletes also learn how they can apply principles from the Pyramid of Success in their academic and athletic career at UCLA.

The Champions Program provides student-athletes with seminars in business etiquette, interviewing, resume development, career shadowing, financial literacy, health & wellness, diversity & inclusion, leadership, community outreach, etc. In the fiscal year 2017-18, 966 student-athletes volunteered a total of 3,391 hours as part of the department’s Community Outreach program. Additionally, the Wooden Academy is supplemented by the Bruin Athletic Council, Student-Athlete Mentors, and Bruin Ambassadors programs, which allow student-athletes to become active members in the athletic community at UCLA. The Associate Director of Student-Athlete Development oversees the Student-Athlete Development Program with the assistance of an intern.

Recommendation: Management should consider adding an additional career employee to the UCLA Student-Athlete Development Program. The success of the program is currently solely contingent on the Director of Student-Athlete Development, making it susceptible to risk if turnover would occur.

Response: In addition to an intern, a committee of AS2 staff and a DIA Staff Associate support various programs throughout the year. Adding an additional career employee to the UCLA Student-Athlete Development staff may not be feasible within this academic year due to budgetary considerations.

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