

**UNIVERSITY OF CALIFORNIA, DAVIS
AUDIT AND MANAGEMENT ADVISORY SERVICES**

**UC Davis
Undergraduate Admissions – Phase 2
Audit & Management Advisory Services Project #20-48**

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Undergraduate Admissions – Phase 2
AMAS Project #20-48

MANAGEMENT SUMMARY

Background and Purpose

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

In fiscal year 2019-20, ECAS oversaw the second phase of the systemwide audit of undergraduate admissions (Phase 2 Audit). ECAS coordinated execution of this Phase 2 Audit with the internal audit departments at all UC undergraduate campuses using a common systemwide audit program. Building on the foundation of the Phase 1 Audit, this Phase 2 Audit assessed the operational effectiveness of controls identified in the first audit.

Objectives and Procedures

The overall objectives of the Phase 2 Audit were to assess campuses' adherence to their controls over undergraduate admissions, assess the effectiveness of campus policy and controls over undergraduate admissions, and identify any effects of deficiencies in those controls. In order to satisfy these objectives, Audit and Management Advisory Services (AMAS) interviewed staff from Undergraduate Admissions and Intercollegiate Athletics, selected and reviewed samples of "special talent" and "admission by exception" applicant records, tested the appropriateness of user access levels to Undergraduate Admissions' primary admissions IT system, and reviewed student athlete participation records. The scope of the Phase 2 Audit included a review of the operating effectiveness of controls in the following areas:

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

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

The ECAS audit program included procedures to evaluate and test controls pertaining to undergraduate admissions applications received from Fall 2016 through Spring 2019.

Conclusion

Our evaluation of internal controls over undergraduate admissions identified several opportunities to strengthen controls in the following areas:

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

Additional details related to our findings in these areas can be found in the attached matrix.

Observations	Recommendations	Management Corrective Actions	Target Date
<p>A. Documentation of Admissions Decisions</p> <p>Undergraduate Admissions has informal teams or committees established that are unofficially charged with making certain admissions decisions. These committees are established based on delegated authority from the executive director of admissions. The job descriptions for committee members do not explicitly provide for this type of committee creation or participation. The campus would benefit from establishing and maintaining sufficient documentation for admissions committees to ensure that their purpose, membership, and processes are clear, and that their decisions are appropriately memorialized.</p> <p>Clear and complete documentation of admissions policies, procedures, and decisions is necessary to establish clear guidance, maintain consistency in the admissions process, and reduce the risk of fraud. In its report for the Systemwide Audit of Undergraduate Admissions – Phase 1, the Office of the President required all campuses to begin documenting admissions decisions. Undergraduate Admissions has since completed this corrective</p>	<p>A.1 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"> ● Key objectives or purpose ● Authority ● Responsibilities ● Membership, including term limits and voting privileges ● Frequency of meetings ● Review criteria ● Approval or decision-making process and requirements, including quorum requirements and documentation requirements 	<p>a) Undergraduate Admissions will document a list of committees or teams that participate in admissions decisions.</p>	<p>5/15/2020</p>
		<p>b) Undergraduate Admissions will formalize any committee or team that participates in admissions decisions. A charter will be documented for each, and will include at a minimum:</p> <ul style="list-style-type: none"> ● Key objectives or purpose ● Authority ● Responsibilities ● Membership, including term limits and voting privileges ● Frequency of meetings ● Review criteria ● Approval or decision-making process and requirements, including quorum requirements and documentation requirements 	<p>6/1/2020</p>
		<p>c) Undergraduate Admissions will develop an annual process to review and revise charters that will be developed as part of Undergraduate Admissions’ identification and formalization of committees or teams that participate in admissions decisions.</p>	<p>6/1/2020</p>
	<p>A.2 Evaluate current retention practices for admissions documentation, including approval documentation, and ensure documented</p>	<p>a) Undergraduate Admissions will review and implement retention practices for admissions documentation, including approval documentation in accordance with guidance provided by Systemwide</p>	<p>5/15/2020</p>

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<p>action. During the Phase 2 review, we found an opportunity to expand controls to include a review of current retention practices and adherence to the appropriate records retention schedule for all admissions documentation.</p>	<p>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>Undergraduate Admissions. These retention practices must be documented in policy or procedure.</p>	
		<p>b) Undergraduate Admissions will develop training on records retention requirements related to admissions documentation. Undergraduate Admissions will require appropriate personnel (the Operations Team) to complete training on record retention requirements periodically (at least annually)</p>	<p>5/15/2020</p>
		<p>c) Regarding retention of admissions documentation, including approval documentation, Undergraduate Admissions will develop, document, and implement quality control reports to ensure that documents are retained in accordance with the UC Records Retention Schedule. The scope of these reports must include documentation from Music, ROTC, and Intercollegiate Athletics.</p>	<p>6/1/2020</p>
		<p>d) Regarding retention of admissions documentation, including approval documentation, Undergraduate Admissions will amend its practices in accordance with results of quality control reports periodically. This requirement will be documented in policy or procedure.</p>	<p>6/1/2020</p>
<p>B. This observation is applicable only to the Office of the President.</p>			

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<p>C. Special Talent Admissions</p> <p>Undergraduate Admissions considers recommendations from campus units that are based on special talent, such as in athletics or the arts, which have been termed as special talent admissions. These recommendations may come in the form of lists of prospective student athletes or summary scores of talent-based portfolios that a department reviews.</p> <p>In its report for the Systemwide Audit of Undergraduate Admissions – Phase 2, the Office of the President identified that all UC campuses do not track candidates for special talent admissions using centralized systems. Therefore, the campuses are not able to identify the full population of special talent admissions, nor are they able to readily access basic data on these admissions.</p> <p>Specific to UC Davis, we noted that certain documentation procedures supporting special talent admissions were determined to be inadequate. For example, limited informal documentation was received but not retained, including e-mail support from ROTC and Music.</p>	<p>C.1 Implement controls to ensure that applicants recommended on the basis of special talent are identified and tracked in accordance with the guidance provided by Systemwide Undergraduate Admissions as recommended in the Phase 1 Audit.</p>	<p>a) For applicants recommended on the basis of special talent (ROTC, Music, and Athletics), Undergraduate Admissions will identify and track applicants using Inside Admissions in accordance with guidance provided by Systemwide Undergraduate Admissions. Inside Admissions will develop controls to ensure that recommended special talent applicants are identified and tracked.</p>	7/1/2020
	<p>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.</p>	<p>a) For Music and ROTC, Undergraduate Admissions will upgrade its online tool to allow for uploading of documentation supporting special talent admission recommendations.</p>	6/1/2020
	<p>b) Undergraduate Admissions will revise existing retention practices for documentation supporting special talent recommendations to reflect guidance provided by Systemwide Undergraduate Admissions. Revised practices must be documented in policy or procedures.</p>	6/1/2020	
	<p>c) Undergraduate Admissions will develop training on records retention requirements related to documentation supporting special talent recommendations. Undergraduate Admissions will require appropriate personnel to complete training on record retention requirements periodically (at least annually).</p>	6/1/2020	
<p>d) Regarding retention of documentation</p>	6/1/2020		

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		supporting special talent recommendations, Undergraduate Admissions will develop, document, and implement quality control reports to ensure that documents are retained in accordance with guidance provided by Systemwide Undergraduate Admissions. The scope of these reports must include documentation from Music, ROTC, and Intercollegiate Athletics.	
		e) Regarding retention of documentation supporting special talent recommendations, Undergraduate Admissions will amend its practices in accordance with results of quality control reports periodically. This requirement will be documented in policy or procedure.	6/1/2020
		f) Intercollegiate Athletics will revise existing retention practices for documentation supporting special talent recommendations to reflect appropriate guidance provided by Systemwide Undergraduate Admissions. Revised practices will be documented in Intercollegiate Athletics’ policy or procedures document.	5/1/2020
		g) Intercollegiate Athletics will develop training on records retention requirements related to documentation supporting special talent recommendations. Intercollegiate Athletics will require Compliance Services personnel to complete training on record retention requirements periodically (at least	5/1/2020

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<p>D. Admission by Exception</p> <p>Admissions by Exception refers to the UC policy under which a campus may admit applicants who do not meet minimum UC requirements for admission but demonstrate high potential for academic success and leadership. Specifically, in July 1996 the Regents issued Policy 2105: Policy on Undergraduate Admissions by Exception.</p> <p>Per Regental policy, applicants who are admitted by exception are classified as “disadvantaged” or “other” (with limits in place on the maximum number within each category). Disadvantaged applicants are those from low socioeconomic backgrounds or who have experienced limited educational opportunities.</p> <p>In our sample testing of admissions by exception, we identified one instance of a student classified as other who should have been classified as disadvantaged.</p> <p>Given that Undergraduate Admissions must monitor and limit the number of students that they admit by exception, controls should be in place to ensure that students are accurately</p>	<p>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.”</p>	<p>annually).</p> <p>Since the initiation of this review, Undergraduate Admissions has revised its practices from manually identifying Admission by Exception applicants to an automated identification process.</p> <p>a) In accordance with newly implemented controls, Undergraduate Admissions will continue to automatically identify Admission by Exception applicants. This includes providing documentation regarding the technical development that is currently being used or will be used to accurately classify students admitted by exception as student athletes and those designated as “disadvantaged” or “other”.</p>	<p>6/1/2020</p>
		<p>b) Undergraduate Admissions will develop, document, and implement quality control reports to ensure accurate classification of students who are admitted by exception. The scope of these reports must include student athletes, “disadvantaged”, and “other” students who were admitted by exception.</p>	<p>6/1/2020</p>
		<p>c) Regarding accurate classification of Admissions by Exception, Undergraduate Admissions will amend its practices in accordance with results of quality control reports periodically (at least annually). This requirement will be documented in policy or procedure.</p>	<p>6/1/2020</p>

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categorized.			
<p>E. Admissions IT System Access</p> <p>Inside Admissions is the IT system used by Undergraduate Admissions. Our review included an assessment of Inside Admissions system access controls.</p> <p>Both admissions and IT personnel have access to Inside Admissions depending on their job responsibilities. Our review identified that some users had a level of access that was outdated and no longer necessary based on their current job functions. We also identified that some individuals who engage in direct contact with students had a level of access that could have allowed them to make changes to admissions decisions.</p> <p>Our review determined that one group of personnel needs a reassessment of existing privileges and another group of personnel should be removed from access entirely.</p> <p>Also, Undergraduate Admissions does not maintain documentation supporting authorization of access to Inside Admissions. Management represented that access is granted as part of the onboarding process for</p>	<p>E.1 Update admissions IT system user access to ensure that access is appropriately aligned with job responsibilities.</p> <p>E.2 Document admissions IT system access provisioning processes to ensure that access is only provided to authorized individuals and that access rights are consistent with users’ roles and responsibilities. At a minimum, these procedures should require:</p> <ul style="list-style-type: none"> ● Documented justification and authorization for user access to admissions IT systems ● Maintenance of a list of authorized users and associated privileges 	<p>a) Undergraduate Admissions will update admissions IT system user access to ensure that access is appropriately aligned with the job description and responsibilities of the employee.</p> <p>a) Undergraduate Admissions will document admissions IT system access provisioning processes to ensure that access is only provided to authorized individuals and that the level of access granted is consistent with a user’s role and responsibilities. These procedures will require:</p> <ol style="list-style-type: none"> 1. Documented justification and authorization for specific levels of user access to admissions IT systems. 2. A regularly updated and verified list of authorized users and associated privileges. 	<p>5/15/2020</p> <p>5/15/2020</p>

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Undergraduate Admissions personnel; however, in the absence of documentation, this process could not be verified.			
<p>F. Monitoring Student Athletes' Participation in Athletic Programs</p> <p>Documentation to support student athletes' participation in athletic programs represents an internal control to help mitigate the risk of fraudulent admissions based on falsified athletics profiles or bribery of athletics officials. We noted that in certain cases participation records for student athletes were inadequate or not current. For instance, sufficient supporting documentation does not always exist to demonstrate the reason why recruited student athletes do not remain on team rosters. During the course of our review, Intercollegiate Athletics had begun to require coaches to document reasons for changes in a student athlete's participation status.</p> <p>Also, historically Intercollegiate Athletics has not reported on documented reasons for roster changes to the Committee on Enrollment and Admissions. This type of reporting would enhance oversight and mitigate the risk of fraudulent</p>	<p>F.1 Implement controls, such as required forms, to ensure that reasons for changes in athletics program participation status are clearly documented.</p>	<p>Since the initiation of this review, Intercollegiate Athletics has implemented a control that requires coaches to update roster change forms using a comment box to document the reason for changes in athletic program participation status during students' first year of enrollment.</p> <p>a) In accordance with newly implemented controls, Intercollegiate Athletics will continue to require coaches to update roster change forms to ensure that reasons for changes in athletic program participation status are clearly documented.</p> <p>b) Intercollegiate Athletics will develop and provide reporting on the documented reasons for roster changes to the Committee on Enrollment and Admissions annually.</p> <p>c) Intercollegiate Athletics will develop a process for reporting on the documented reasons for roster changes to the Committee on Enrollment and Admissions. This process will include annual reporting and will be documented in policy or procedure.</p>	<p>5/1/2020</p> <p>5/1/2020</p> <p>5/1/2020</p>

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recommendations and admissions.			
<p>G. Admissions Appeal Process</p> <p>Undergraduate Admissions has implemented a process for students to appeal admissions decisions. Generally, a student must demonstrate new and compelling information or extenuating circumstances for an appeal to be considered. Appeals may also address circumstances other than admissions decisions, such as late applications, late intent to register, or rescinded provisional admission offers.</p> <p>Undergraduate Admissions has documented processes for certain aspects of the appeals process. Policies and procedures need to be improved, however, so that all appeal analyses, recommendations, decisions, and decision-makers are fully documented.</p>	<p>G.1 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"> ● A requirement that all appeal reviews be fully documented, including analyses, recommendations, decisions, and individuals involved. ● A requirement that at least two individuals or a committee be involved in appeals reviews, and if final decisions are contrary to initial recommendations, the rationale for final decisions must be documented. 	<p>a) Undergraduate Admissions will develop new or amend existing local policies and procedures to address requirements for all appeals decisions. The policies and procedures will include the following:</p> <ol style="list-style-type: none"> 1. All appeal reviews will be fully documented, including analyses, recommendations, decisions, and individuals involved. 2. At least two individuals or a committee will be involved in the appeals review, and if the final decision is contrary to the initial recommendation, the rationale will be documented. 	<p>5/15/2020</p>
<p>H. Delegations of Authority</p> <p>Undergraduate Admissions indicated that the executive director has delegated authority to senior management staff to make admissions decisions. However, these delegations</p>	<p>H.1. Document all delegations of authority from the Undergraduate Admissions executive director to senior management staff regarding authority to make admissions decisions.</p>	<p>a) Undergraduate Admissions will document all delegations of authority from the Undergraduate Admissions executive director to senior management staff regarding authority to make admissions decisions.</p>	<p>6/1/2020</p>

Observations	Recommendations	Management Corrective Actions	Target Date
of authority are not documented.			
<p>I. Student Athlete Participation Documentation</p> <p>In Phase 1 of the Systemwide Audit of Undergraduate Admissions, the Office of the President issued the following recommendation 9.3: “Campuses should establish controls to ensure records supporting ongoing participation in athletics are kept current throughout the season.”</p> <p>To assess the adequacy of student athlete participation documentation, we reviewed NCAA CARA (Countable Athletically Related Activities) records on a sample basis and compared these to roster lists and other participation documentation. In certain cases, we noted inconsistencies among the documentation; for example, one student athlete remained on a CARA log in the month subsequent to having been removed from the official roster.</p>	<p>I.1. Intercollegiate Athletics should establish procedures to reconcile the various forms of student athlete participation documentation on a periodic basis.</p>	<p>a) Intercollegiate Athletics will establish procedures to reconcile the various forms of student athlete participation documentation on a periodic basis.</p>	7/1/2020
<p>J. Student Athlete Minimum Participation Requirement</p> <p>In Phase 1 of the Systemwide Audit of Undergraduate Admissions, the Office of the President issued the following recommendation 9.1: “Campuses</p>	<p>J.1. Revise the one-year minimum participation requirement to extend into a student athlete’s second year in cases when a student athlete redshirts their first year at UC Davis.</p>	<p>a) Intercollegiate Athletics will revise the one-year minimum participation requirement to extend into a student athlete’s second year in cases when a student athlete redshirts their first year at UC Davis.</p>	7/1/2020

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<p>should 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.”</p> <p>At UC Davis, Intercollegiate Athletics has instituted a policy establishing this one year minimum participation requirement. However, the policy does not adequately account for student athletes who redshirt their first year, which may occur for a variety of reasons.</p> <p>A redshirt year should not qualify as satisfying the one year participation requirement because of the increased vulnerability of fraud. Under the current policy, a student athlete could meet the one year requirement without actually participating.</p>			