**UC** **RIVERSIDE: AUDIT & ADVISORY SERVICES**

Date: October 11, 2019

To: LaRae Lundgren, Associate Vice Chancellor Enrollment Services

Subject: Systemwide Audit of Undergraduate Admissions Process

Ref: R2019-E

We have completed our Systemwide Audit of Undergraduate Admissions Process 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 R2019-E 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

Emily D Engelschall, Director of Undergraduate Admissions

##### Deborah L Jaurigue, Associate Director of Recruitment and Evaluation

Tamica N Smith Jones, Director of Athletics

Joshua Smith, Assistant Athletics Director, Compliance Services

UNIVERSITY OF CALIFORNIA AT RIVERSIDE

AUDIT & ADVISORY SERVICES

INTERNAL AUDIT REPORT R2019-E

SYSTEMWIDE AUDIT OF UNDERGRADUATE ADMISSIONS PROCESS

October 2019

Approved by:

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Director

**UC RIVERSIDE**

**SYSTEMWIDE AUDIT OF UNDERGRADUATE ADMISSIONS PROCESS**

**INTERNAL AUDIT REPORT R2019-E**

**October 2019**

1. **MANAGEMENT SUMMARY**

In response to recent nationwide issues involving third parties exploiting vulnerabilities in college admissions processes specifically 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 it has strong controls in place to reduce its exposure to third party interference. Accordingly, the UC Systemwide Office of Ethics, Compliance and Audit Services (ECAS) has amended its Fiscal Year 2018-19 Audit Plan to include a systemwide audit of Undergraduate Admissions. This audit was performed in coordination with the Internal Audit departments for all UC campuses with Undergraduate Programs including UCR using a standard systemwide audit program. This report summarizes the results of the audit work done at UCR from information provided by and work performed at the UCR Admissions Office and Athletics Department. We observed areas noted below that need enhancement to strengthen internal controls and /or effect compliance with UC Policy and Procedures:

* Access Control (Observation III.A)
* Incomplete Memorandum of Understanding, MOU (Observation III.B)

In addition to these UCR-related observations, there are Systemwide audit observations, recommendations, and management action plans noted in a separate Systemwide Audit Report of Undergraduate Admissions. These recommendations and related management action plans are attached at the end of this report (See Appendix A).

1. **INTRODUCTION**
   1. **PURPOSE**

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

* 1. **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 UCR’s Student Information System (Banner) automatically, on a daily basis when the file of applicants is received from University of California, Office of the President (UCOP). When these applications are imported into the Banner System, an Academic Index Score (AIS) is calculated for each applicant. Additionally, a program runs that places applicants in various categories to help inform the application review. Some students are categorized as eligible automatically based on academic characteristics of the applicant that are assigned and coded at the Systemwide level. However, for the applications that are not determined to be automatically eligible, Admission Counselors (ACs) are assigned to 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 Testing (ACT) with writing or Scholastic Assessment 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, the University has distributed all applications to the campuses, and application evaluations are complete, Undergraduate Admissions, Institutional Research, the Provost/Executive Vice Chancellor, and the college offices coordinate to determine the number of students that can be admitted. These determinations allow Undergraduate Admissions to make provisional admissions decisions. After Undergraduate Admissions perform quality checks to verify that the correct students are being selected for admission, decisions are finalized in Banner and communicated to the 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 an offer 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.

*Comprehensive Review*

The nine UC undergraduate campuses independently review each application for admission using a process known as the 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 the 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 applicants’ high school environment, personal accomplishments, family environment, and other circumstances.

BOARS developed guidelines for selection criteria under the 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.

UCR does not use a holistic approach to the comprehensive review; rather UCR’s methodology of the comprehensive review implementation is a fixed-weight model, using five of the 14 factors, all of which are standard measurable criteria.

*Admissions Requirements*

The admissions requirements for UC are the minimum academic standards that a student 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 a minimum 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.

*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 admission 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 admission by exception policy, up to four percent of which may be disadvantaged students, but in practice, according to Systemwide Undergraduate Admissions, UCR has granted admission by exception to less than two percent of all new enrollees over the last several years.

*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.

*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 bandleader or debate coach, could also recommend an applicant whose ability they believe would be beneficial to their program or team.

* 1. **SCOPE**

In the fourth quarter of Fiscal Year 2018-19, 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.

The review included evaluating the adequacy and effectiveness of internal controls over the Admissions process. The review was principally limited to the following areas:

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

1. **Procedures**
2. We reviewed the following Admissions process related policies, guidelines and procedures:

* Freshman Evaluation Tool and Work Center Procedures
* Freshmen Validation Procedures
* Transfer Validation Procedures
* Undergraduate Admissions Freshman and Transfer Selection Overview
* Guidelines for Admission by Exception, Supplemental Criteria (Revised June 26, 2017)
* Intercollegiate Athletics Procedures
* Systemwide policies and procedures for Undergraduate Admissions

1. We conducted walkthrough procedures of the Admissions process with the Undergraduate Admissions Office and Athletics Department as follows:

* The admissions process including freshman and transfer admissions
* Process associated with the implementation of admissions by exception
* Any non-standard admissions practices and /or ancillary processes feeding into the admissions process such as recommendations for admissions from Athletics and other departments
* Processes to verify information on Undergraduate Admissions applications, including academic credentials and achievements outside of the classroom
* Processes and controls over student athletes’ participation in the Athletics programs for which they are recruiting
  1. **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 April to July 2019. Accordingly, this evaluation of internal controls is based on our knowledge as of that time and should be read with that understanding.

1. **OBSERVATIONS, COMMENTS, AND CORRECTIVE ACTION PLANS**
   1. **Access Control**

Internal controls over systems access in the Undergraduate Admissions (UA) office need to be enhanced. Specifically, a number of administrative staff/counselors/students have been granted edit access to the Admission Decision Screen (SAADCRV) in the Banner system and Admission Counselors have access to override Admissions decisions.

Information Technology systems access controls were addressed in the systemwide report (see Appendix A section 6.1).

**Management Corrective Action Plan**

UA will limit edit access to SAADCRV within the campus Student Information System (Banner) to the UA Assistant Director, Associate Director and Director. Additionally, limited administrative staff who do not have update access to either the Freshman or Transfer Evaluation tool may be granted edit access to SAADCRV. UA Counselors will be granted access to both the Freshman and Transfer Evaluation tool and the evaluation decisions will be transmitted directly to Banner from the evaluations via a nightly data feed. A review of current individuals who have edit access to SAADCRV will be completed with relevant offices and a determination will be made as to business need for each individual currently with edit access. A specific effort will be made to reduce the number of UCR employees with edit access. Additionally, on an annual basis, the UA Director will request a list from the UCR Information and Technology Services (ITS) of all campus staff who have been granted access to SAADCRV for review to determine if staff in the list have a business need for access.

Moving forward, UA and ITS will develop a workflow that includes an extra layer of approval by an appropriate party prior to granting edit access to SAADCRV.

**Expected Implementation Date:**

October 31, 2019

* 1. **Incomplete Memorandum of Understanding**

A Memorandum of Understanding (MOU) exists between the Athletics Department and the UA Office. The MOU outlines the timeframe for evaluations as well as deadlines and exceptions. However, the MOU developed during Fiscal Year 2015-2016 has not been updated. In addition, there is no signature page to evidence that the Athletics Department and the UA Office agreed to the MOU provisions.

**Management Corrective Action Plan**

The Athletics Department and the UA Office agreed to revisit and review/update/sign the existing MOU.

**Expected Implementation Date:**

October 31, 2019

**Appendix A**

| **Recommendation** | **Management Corrective Action** | **Target Date** |
| --- | --- | --- |
| 1.1 Document any local policies and develop detailed procedures for all aspects of the application evaluation and admissions process, to include the following:   * Criteria used to evaluate applications, including any qualitative factors considered, consistent with comprehensive review * Minimum documentation requirements to demonstrate application of criteria in the evaluation results * For freshman application evaluations that consider qualitative factors, a requirement that at least two independent documented evaluations support a decision to admit | Gather all current admission and evaluation documentation for all populations to include: freshman, transfer, California resident and nonresident. Update and/or create evaluation procedures for all aspects of the application evaluation and admissions process that are not currently in place. Documentation will include criteria used to evaluate applications that are consistent with comprehensive review. Minimum documentation requirements will be detailed to demonstrate application of established criteria in evaluation results. Ensure all UCR admission policies are documented and in cases where documentation is not present, work in partnership with the Senate Admissions Committee to ensure appropriate documentation is created. Place all documentation in one repository, potentially Sharepoint. Develop a documented timeline for an annual review/update of all documentation.  Bullet point three is not applicable to UCR, given the fixed point weighted/machine scored system of comprehensive review implementation in place at UCR.  **Responsible:** Deborah Jaurigue, Associate Director, Undergraduate Admissions | 12/1/2019 |
| 1.2 Document all admissions decisions with sufficient detail to:   * Meet the minimum documentation requirements specified in the policies and procedures described in recommendation 1.1 * Indicate the specific individuals and/or committees that were involved in the evaluation of the application and the final decision | Review current protocols for documentation of evaluation results and admission decisions to determine potential gaps to meet the requirements of recommendation 1.2. Work with ITS to close any documentation gaps that are identified as a result of review.  **Responsible:** Emily Engelschall, Director, Undergraduate Admissions | 3/1/2020 |
| 3.2 Clearly identify and track all applicants that departments recommend on the basis of special talent. | Review and update tracking procedures that are currently in place for athletic special talent. Develop similar procedures for special talent applicants outside of athletics.  **Responsible:** Deborah Jaurigue, Associate Director, Undergraduate Admissions | 11/1/2019 |
| 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. | 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.  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.  **Responsible:** Emily Engelschall, Director, Undergraduate Admissions | 12/1/2019 |
| 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. | **Athletes:**  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.  The Athletic Director will serve as final approval for recommendation for admission for all prospective students (aid or non-scholarship).  **Non-Athletes:**  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.  **Responsible:** Joshua Smith, Assistant Athletics Director, Compliance Services and Emily Engelschall, Director Undergraduate Admissions | 12/1/1019 |
| 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. | 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.  **Responsible:** Joshua Smith, Assistant Athletics Director, Compliance Services | 10/1/1019 |
| 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. | 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.  **Responsible:** Emily Engelschall, Director, Undergraduate Admissions | 12/31/2019 |
| 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. | UCR has a policy in place for recommendation 4.2 as outlined in the Senate approved document *“Guidelines for Admission by Exception Supplemental Criteria”* 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 *“Guidelines for Admission by Exception Supplemental Criteria”* document.  In a separate document Undergraduate Admissions will outline the admissions evaluation process that takes place in support of the *“Guidelines for Admissions by Exception Supplemental Criteria”* policy document  **Responsible:** Emily Engelschall, Director, Undergraduate Admissions | 12/1/2019 |
| 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. | UCR’s Senate approved Admission by Exception policy, *“Guidelines for Admission by Exception Supplemental Criteria”*, 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.  **Responsible:** Deborah Jaurigue, Associate Director, Undergraduate Admissions | 11/1/2019 |
| 4.4 Establish local procedures to annually monitor compliance with the campus percentage limits for admissions by exception established by Regental policy. | 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.  **Responsible:** Emily Engelschall, Director, Undergraduate Admissions | 12/1/2019 |
| 5.1 Establish documented conflict of interest policies and procedures that cover all individuals who are involved in reviewing admissions applications or making admissions decisions, including external readers. At a minimum, these policies and procedures should require that such individuals annually:   * Disclose the nature of their acquaintance with known applicants, their families or any other potential conflict of interest and attest, under penalty of disciplinary action, that they have recused themselves from reviewing applications associated with these potential conflicts * Attest that they are not aware of any attempt to improperly influence an admissions decision. | Review current conflict of policy documents that are in place at other UC campuses. Draft and implement formal conflict of interest policy document for Undergraduate Admissions. Ensure document is signed by all staff members who review applications and/or make admission decisions for UCR applicants. Develop a documented procedure that allows staff to disclose a potential conflict of interest with an applicant. In addition to conflict of interest policy, develop a separate document that allows applicable staff members to attest they are not aware of any attempt to improperly influence an admission decision which will be signed at the conclusion of each evaluation cycle. Ensure signing of conflict of interest policy is embedded into the onboarding process for applicable staff. Incorporate a review of finalized conflict of interest policy into annual staff training.  **Responsible:** Emily Engelschall, Director Undergraduate Admissions | 11/1/2019 |
| 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. | 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.  UCR does not currently employ external readers; therefore that portion of recommendation 5.2 does not apply to UCR.  **Responsible:** Emily Engelschall, Director, Undergraduate Admissions | 11/1/2019 |
| 5.3 Establish controls requiring external readers to disclose any current affiliations with high schools or community colleges and preventing those who have such affiliations from being assigned an application of a student from that high school or community college for review. | UCR does not currently employ external readers; therefore recommendation 5.3 does not apply to UCR. | N/A |
| 5.4 Establish controls preventing individuals who perform outreach from reviewing applications from individuals with whom they have had more than routine contact. | In consultation with other UC campuses, define routine contact and outline the steps to remove Admission Counselors from the review of an application if they have had more than routine contact with the applicant or know them outside of a professional environment.  **Responsible:** Deborah Jaurigue, Associate Director, Undergraduate Admissions | 11/1/2019 |
| 6.1Implement 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. | 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:   1. Define and document the business need based on job responsibilities for UCR employees to have edit access to SAADCRV 2. Review of the current Banner Access roles that include edit access to SAADCRV 3. Define and document the approval process for granting future edit access to SAADCRV   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.  **Responsible:** Emily Engelschall, Director, Undergraduate Admissions | 12/1/2019 |
| 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. | 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.  Admission Director and/or Associate Director will review all cases that hit developed report for appropriateness.  **Responsible:** Emily Engelschall, Director, Undergraduate Admissions | 12/1/2019 |
| 7.1 If the campus maintains a limit for athletics admissions slots, implement a process for a department independent of athletics to perform a regular documented review of the limit for appropriateness, based on established criteria, to ensure that athletics is not allocated an excessive number of slots, and adjust the limit as necessary. This review should be performed at least every two years and should assess the limit for each sports program if separate limits are established for each program. | UCR’s current practice is to use athletics admission slots solely for admission by exception. In consultation with the Undergraduate Admissions Senate Faculty Committee, Undergraduate Admissions will review established admission by exception limits in place for student-athletes. The local Academic Senate Undergraduate Admissions Committee will specifically determine whether athletic admissions slots should be established for students who meet minimum UC admission requirements but do not meet campus selection (AIS cuts for a given admission term) and therefore do not fall within the Admission by Exception slot policy now in place at UCR. Regardless of whether the committee establishes athletic admissions slots outside of admission by exception, it will perform an annual documented review of appropriateness of the athletic admissions slot limit based on established criteria, and adjust the limit as necessary.  In support of this review Undergraduate Admissions will provide admission by exception statistics for the previous academic year by residency and level (freshman and transfer).  **Responsible:** Emily Engelschall, Director, Undergraduate Admissions | 12/1/2019 |
| 8.1 Establish a policy addressing conflict of interest requirements for athletics personnel including, at a minimum, a requirement to formally disclose and review any known existing relationship between a member of the athletics staff and a prospective student athlete or their family to determine if a potential conflict of interest exists and whether it should be addressed with a management plan. | Athletics will create a policy addressing potential conflicts of interest between coaches/staff and prospective student-athletes and prospective student-athlete’s families. Additional language can be included in the Authorization Form or a separate form discussed and signed annually may be created requiring staff to attest to their understanding of what constitutes a conflict of interest and their requirement to report such a relationship should one arise during the recruitment process.  **Responsible:** Joshua Smith, Assistant Athletics Director, Compliance Services | 12/1/2019 |
| 8.2 Perform an analysis to identify categories of third parties who contact the athletics department regarding prospective student athletes that are unusual or at a higher risk of inappropriately influencing admissions decisions, such as donors, admissions consultants, and athletic recruiting/scouting services not approved by the NCAA. Establish a requirement for all athletics personnel to document all contact from these categories in a central repository. Athletics compliance should at least annually review this list and investigate any questionable contact. | Perform a documented analysis to identify categories of third parties who contact the athletics department regarding prospective student-athletes that are unusual or at a higher risk of inappropriately influencing admissions decisions. Categories to include donors, consultants, recruiting/scouting services among others. Similar to 8.1, Athletics will include as part of their annual review of listed third party contacts, with coaches and staff a requirement to document and notify administration of contact with third parties who we have identified as having a higher risk of inappropriate influence. Potential influences of third parties involvement will be reviewed at least annually and investigated as necessary by compliance and reported to the appropriate authorities (Athletic Director and Title IX/University Compliance Office).  **Responsible:** Joshua Smith, Assistant Athletics Director, Compliance Services | 12/1/2019 |
| 8.3 Provide regular training to athletics personnel on the conflict of interest requirements discussed in recommendations 8.1 and 8.2. | Training to be provided annually during the fall staff meeting.  **Responsible:** Joshua Smith, Assistant Athletics Director, Compliance Services | 2/1/2020 |
| 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:   * Any exceptions to this requirement * Approval requirements for any exceptions to the policy * Consequences for violating the policy | 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.  **Responsible:** Emily Engelschall, Director, Undergraduate Admissions | 2/1/2020 |
| 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. | 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.  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.  **Responsible:** Emily Engelschall, Director, Undergraduate Admissions | 3/1/2020 |
| 9.3 Establish controls to ensure records supporting ongoing participation in athletics are kept current throughout the season. | 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.  **Responsible:** Joshua Smith, Assistant Athletics Director, Compliance Services | 2/1/2020 |
| 9.4 Establish controls to independently monitor compliance with the one-year minimum participation requirement for non-scholarship student athletes recommended for admission. | 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.  **Responsible:** Deborah Jaurigue, Associate Director, Undergraduate Admissions | 2/1/2020 |
| 9.5 Provide regular training to athletics staff on the minimum participation policy requirements. | 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.  **Responsible:** Joshua Smith, Assistant Athletics Director, Compliance Services | 2/1/2020 |
| 10.1 Restructure the reporting relationship of the campus athletics compliance officer to add a direct reporting line to the campus chief ethics and compliance officer. | Review of reporting lines and structure is required with the Athletic Director and possibly the Chancellor’s Office to determine next steps for implementation.  **Responsible:** Tamica Smith-Jones, Athletic Director | 6/1/2020 |
| 11.1 Establish a policy limiting communication between development personnel and the admissions office regarding admissions matters. At a minimum, any communication regarding the admission status of specific applicants should be prohibited. | Research best practice policies currently in place at other universities that UCR could adopt for implementation. Develop a policy specific to UCR. Ensure final policy is communicated to UCR’s Development Office and that all Undergraduate Admissions staff members are aware of policy. Include refresher on policy at annual Undergraduate Admission training and ensure a copy of the policy is given to new staff members during onboarding process.  **Responsible:** Emily Engelschall, Director, Undergraduate Admissions | 11/1/2019 |
| 11.2 Perform a review prior to admission for each non-scholarship recruited athlete to identify any donations from any known relatives of the recruited athlete, or anyone that the athletics department knows to be acting on behalf of the family. A member of senior leadership independent of the athletics department or an existing athletics admissions oversight committee should oversee this review process, including determination of any due diligence required when donations are identified, and approval of any admissions decisions for which donations were identified. | Develop procedure and determination of oversight body for recommendation 11.2, including defining due diligence required when donations are identified and approval of related admission decisions, 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. Consult with development technology team regarding potential mechanisms in place to identify donations for known relatives or those acting on behalf of a recruited athlete. Develop a mechanism for Athletics to identify family members of recruited athletes to help facilitate identification of possible donations.  **Responsible:** Emily Engelschall, Director, Undergraduate Admissions | 3/1/2020 |