AUDIT AND ADVISORY SERVICES

Undergraduate Admissions
Audit
Project No. 19-734
(Local Campus Supplemental Report to
Systemwide Audit Report P19A19)

October 3, 2019

Prepared by: Reviewed and Approved by:

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October 3, 2019

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Vice Chancellor
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Intercollegiate Athletics

Vice Chancellor Sutton and Athletic Director Knowlton:

Phase I of the University of California systemwide audit of Undergraduate Admissions (Project P19A19) has been completed and a systemwide audit report issued by the University of California Office of Ethics, Compliance, and Audit Services (ECAS) at the UC Office of the President on June 22, 2019. The audit report contained observations applicable to all UC campuses. Berkeley's management action plans associated with the systemwide audit report, are included as Attachment A.

In addition to the systemwide audit report, UC Berkeley Audit and Advisory Services developed a supplemental report based on the audit work performed, containing additional observations that apply specifically to the Berkeley campus. Our supplemental observations and the associated management action plans are presented in the accompanying report. Please destroy all copies of draft reports and related documents.

Our audit work was conducted in accordance with the Institute of Internal Auditors' *Standards for the Professional Practice of Internal Auditing* and the University of California Internal Audit Charter.

Thank you to the staff of the Office of Undergraduate Admissions and Intercollegiate Athletics for their cooperative efforts throughout the audit. Please do not hesitate to call on Audit and Advisory Services if we can be of further assistance in this or other matters.

Respectfully reported,

Jaime Jue
Director

Enclosure: Attachment A

cc: Assistant Vice Chancellor and Chief of Staff Anne Jones
Assistant Vice Chancellor and Director Olufemi Ogundele
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University of California, Berkeley
Audit and Advisory Services
Undergraduate Admissions Audit
(Local Campus Supplemental Report to Systemwide Audit Report P19A19)

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OVERVIEW

Executive Summary

This report supplements the Phase I UC systemwide audit report of Undergraduate Admissions (Project No. P19A19) issued by the Office of Ethics, Compliance, and Audit Services (ECAS) at the UC Office of the President on June 22, 2019. The campus management action plans in response to the recommendations of that report are included as Attachment A. This report also contains additional observations and recommendations observed as part of the process walkthroughs that are specific to the Berkeley campus and is intended to be read in conjunction with the systemwide report.

The objective of the systemwide audit was to evaluate the design of controls over undergraduate admissions throughout the system, including controls over admission of student athletes and other non-standard admissions that facilitate compliance with relevant policies and regulations and reduce exposure to potential admissions fraud risk.

Audit procedures were conducted using a common audit program developed for this review by the Office of Ethics, Compliance and Audit Services. These procedures included process walkthroughs and reviews of policies and other documentation used as part of the admissions process. The audit assessed the design of controls that campus internal audit departments identified in the process walkthroughs. However, this project did not directly assess the organization's ongoing adherence to these controls, as it is anticipated to be addressed in the second phase of this systemwide audit.

Based upon local execution of the common audit program developed by ECAS, we observed the following opportunities to strengthen controls and reduce exposure to potential fraud risk. These opportunities supplement the observations and recommendations found in the systemwide report:

Transfers - Review and Selection – Develop and implement guidelines and internal control procedures to standardize the transfer admissions review and selection process across all colleges and schools, including routine oversight and/or monitoring by the Office of Undergraduate Admissions, Student Affairs, and/or the Admissions, Enrollment and Preparatory Education Committee (AEPE) of the Berkeley Division of the Academic Senate.

Director's Review – Develop and implement guidelines and internal control procedures for routine oversight by Student Affairs leadership or AEPE of the Director's Review process, whereby the Admissions assistant vice chancellor and director, in a sole capacity, may initiate admissions decisions and overturn or modify prior decisions.

Access to Admissions Systems – Strengthen protocols and internal control procedures related to the request and approval of system access to the application review platform as well as periodic monitoring of assigned levels of system access and roles.

Management has provided action plans that we believe, if implemented, will address the items identified in our audit.

Source and Purpose of the Audit

This report supplements the Phase I UC systemwide audit report of Undergraduate Admissions (Project No. P19A19) issued by the Office of Ethics, Compliance, and Audit Services (ECAS) at the UC Office of the President on June 22, 2019. The supplemental report contains additional observations and recommendations, observed as part of the process walkthroughs specific to the Berkeley campus, and is intended to be read in conjunction with the systemwide report.

During the fourth quarter of fiscal year 2018-19, the Office of Ethics Compliance and Audit Services (ECAS) at the UC Office of the President directed all internal audit departments at campuses with undergraduate programs to set aside hours in their annual audit plans for a systemwide audit of undergraduate admissions. The objective of the systemwide audit was to evaluate the design of controls over undergraduate admissions throughout the system, including controls over admission of student athletes and other non-standard admissions that facilitate compliance with relevant policies and regulations and reduce exposure to potential admissions fraud risk.

Scope of the Audit

Audit procedures were conducted at each of the nine UC campuses with undergraduate programs and at the UC Office of the President, using a common audit program developed by ECAS. These procedures included process walkthroughs and reviews of policies and other documentation used as part of the admissions process. The audit assessed the design of controls that campus internal audit departments identified in the process walkthroughs. However, this project did not assess the organization's ongoing adherence to these controls. A second phase of the audit, scheduled for fiscal year 2019-20, will assess the operating effectiveness of controls identified, including any effects that may be found as a result of potential control deficiencies.

The scope of the audit included a review of the following areas:

- Systemwide and local policies and procedures for undergraduate admissions
- The admissions process including freshman transfer admissions
- Processes associated with implementation of admissions by exception as defined by Regental policy
- Any non-standard admissions practices and/or ancillary processes feeding into the admissions process such as recommendations for admission 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 athletic programs for which they were recruited.

Summary Conclusion

Based upon local execution of the common audit program developed by ECAS, we observed the following opportunities to strengthen controls and reduce exposure to potential fraud risk. These opportunities supplement the observations and recommendations found in the systemwide report:

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SUMMARY OF OBSERVATIONS & MANAGEMENT RESPONSE AND ACTION PLAN

Ensuring Consistency in the Review of Transfer Student Applications

The Office of Undergraduate Admissions (OUA) has responsibility for the review of transfer student applications for the College of Letters & Science, the largest college on campus. The other colleges and schools conduct their own review of transfer student applications. The OUA provides the pool of applicants that have applied to each college/school. Each college/school reviews and selects applicants, and informs the OUA of those they wish to admit. The OUA then checks the general admissibility of each applicant selected. Each college/school sets the number of reads required for each student, selects, trains, and monitors their readers, and creates documentation. UC guidelines for transfer admissions generally focus on coursework assessment and general admission criteria. Campus guidelines for the College of Letters & Science are reviewed and approved by AEPE on an annual basis.

There are currently no standard processes for the review and selection of transfer applicants across the non-Letters & Science colleges/schools and the OUA does not routinely monitor their review and selection processes. There is risk that one or more colleges/schools may not sufficiently follow existing guidelines or may not incorporate adequate controls into their admissions processes. This could result in inconsistency in Berkeley's transfer admissions practices.

To ensure that appropriate review and selection controls are in place and to promote campus consistency in transfer admissions practices, the OUA and AEPE may wish to consider developing policy and guidelines to standardize the transfer admissions review and selection processes across all colleges and schools. Once implemented, the OUA, Student Affairs, AEPE or a combination of these groups, could monitor the processes regularly to ensure ongoing compliance.

Management Response and Action Plan

OUA management along with AEPE leadership will convene a working group to document the roles and responsibilities of college stakeholders in the planning and implementation of the Transfer Evaluation process. The working group will work to ensure that colleges document ratings and evaluations in a manner consistent to OUA's documentation. The working group will examine the process and protocols used by the colleges in regards to the training and evaluation of applicants and evaluators. The group will also identify the evaluators and all stakeholders who have access to systems and applicant files, and will reduce and eliminate conflicts of interest. Target completion date: June 30, 2020

Director's Review

As part of normal operations, the Undergraduate Admissions assistant vice chancellor and director (the director) reviews various applications that meet certain criteria or are referred by OUA staff during the admissions cycle. The staff can refer applications for any reason. In these cases, the director performs a supplemental review which is documented in the Slate system.

In addition, the director initiates his own reviews that may include

- Reviewing the selector's selection results to determine whether the admission targets, strategy, and criteria were met and properly applied during selection.
- Reviewing applicant coverage by geographic area, various outreach communities, and programs (example: Upward Bound, Local Control Funding Formula - LCFF) to ensure there is adequate representation.
- Checking whether waitlisted applicants should have been admitted and whether additional applicants can be accepted.

The director reviews about sixty applications and indicates that he changes the admissions decision of an estimated one-third to two-thirds of the applications. The results of the Director's Review are final and no further review is done. The director does not delegate the Director's Review and does not take advocacy calls.

Some of the decisions are "new" in that they are based on the director's "newly initiated research" and sole discretion. These final decisions can be subjective. To strengthen controls and ensure that the changes made by the director do not reflect intended or unintended bias, the results of the Director's Review should have appropriate oversight and monitoring.

We observe an opportunity to develop and implement guidelines and internal control procedures for routine oversight by Student Affairs leadership or AEPE of the Director's Review process, in those instances where the Admissions assistant vice chancellor and director acts in a sole capacity and may initiate admissions decisions and overturn or modify prior decisions.

Management Response and Action Plan

Selection, as a process, will be completed by a committee of the assistant vice chancellor, deputy director, one associate director – likely the associate director overseeing Systems, and a business analyst. All associate directors will be involved in selection to oversee and guide processes, such as Quality Control measures to ensure that this work is not completed solely by one individual. The assistant vice chancellor, in coordination with the AEPE, will develop and implement guidelines and procedures for the committee review and ongoing oversight of the process. Target completion date: June 30, 2020

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Access to Admissions System

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Currently, approximately 350 people have access to Slate, the undergraduate admissions application review system. The OUA Systems associate director is responsible for processing requests for security access.

Standard Process for Review and Approval of Systems Access Requests

A formal security request process, including the completion of a standard access request form, is not currently in place. The OUA Systems associate director informally receives requests from managers generally via email or conversation. It is up to colleges, reader managers, and other managers to identify and vet persons for which they are requesting access. In order to improve controls, a formal access security process should be developed, including a standard access request

form. The form should clearly indicate the reason for the request, the role that the person will be performing, and documentation of the appropriate approvals. The request forms should be reviewed and approved by the initiating manager and the OUA Systems associate director. In addition, clearly defined system access roles and responsibilities should be assigned to people requesting access to the admissions system so that systems access can be effectively maintained and monitored.

Periodic Review of System Access

The OUA Systems associate director performs a quarterly review of access to the Slate system. On a judgement basis, the level and type of activity of a current selection of individuals is checked against what they are approved to do and whether they have a valid Berkeley CalNet identity. The OUA Systems associate director also checks for unusual access and activity within the system. While these are desired components of a review, the nature of the review, the specific elements reviewed, and the categories of persons reviewed should be standardized so that the review is thorough and the consistency of the review is maintained. A standard review checklist could be prepared and the results of the review documented when performed.

Management Response and Action Plan

A request form is in the process of being developed for Fall 2019 implementation that will include Data Requests, Systems Access, and Communications. This process will formalize access requests and take the requests out of emails or GoogleDoc and place them in the systems that we are using. Creating this process will allow for systems access to be managed in a more project management format. As such, timelines and review can be formalized, and may include checklists for a user permissions review. Target completion date: December 31, 2019

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UC Berkeley

UCOP Report Recommendation	Management Response/Corrective Action Plan	Target Completion 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	The Office of Undergraduate Admissions (OUA) will work with Intercollegiate Athletics (IA) and AEPE to enhance policies and procedures for all aspects of the application evaluation and admissions process. Criteria used in evaluating application results, including any qualitative factors considered and demonstration of their application in the evaluation results, will be documented. At Berkeley, all Freshman applications currently receive two documented reviews.	May 2020
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	OUA will implement documentation required in the policies and procedures in 1.1. The documentation will include the specific individuals and/or committees that were involved in the evaluation of the application.	May 2020

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MANAGEMENT RESPONSES FOR UC BERKELEY

UCOP Report Recommendation	Management Response/Corrective Action Plan	Target Completion Date
3.2 Clearly identify and track all applicants that departments recommend on the basis of special talent.	OUA will work with AEPE to establish policy and documented procedures that address the identification and tracking of special talent non-athletes, as well as how they are evaluated and selected for admission.	May 2020
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.	OUA will strengthen and document the special talent review process for non-athletes to include the minimum requirements for documented verification. IA will enhance and update its policies and *Admissions Request Form* to require coaches to provide documentation to substantiate the coach's assertion that the non-scholarship prospective student-athlete has special athletic talent. Policies will include minimum requirements for the documentation, including the types of information and trusted sources.	May 2020 May 2020

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UCOP Report Recommendation	Management Response/Corrective Action Plan	Target Completion Date
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.	OUA will update the current non-athlete special talent assessment process and related documentation, to include two-step verification and supervisory approval. In recent years, coaches have been required to sign an *Admissions Request Form* and provide an endorsement of the athletic talents for all non-scholarship recruited student-athletes. IA will update this process to require the head coach (not assistant coaches or staff), as the initiator, to sign the *Admission Request Form* for each respective applicant, attesting under penalty of disciplinary action that an appropriate assessment of special talent has been conducted, and that the level of special talent warrants a recommendation. The IA Compliance Office, as approver, will be required to approve all recommendations.	May 2020 May 2020
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.	The OUA and the Athletic Compliance Office have jointly conducted this verification in recent years. The IA Compliance Office will formalize and document the qualification verification process currently used, including verification resources.	May 2020

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UCOP Report Recommendation	Management Response/Corrective Action Plan	Target Completion Date
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.	Policy developed as part of recommendation 3.3 will include a provision that all non-athlete special talent admits will be approved by the Director or Deputy Director of OUA.	May 2020
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.	The OUA will develop a policy that defines and documents the acceptable rationale and required evaluation process for admission by exception. Candidates will be referred or recommended by admission officers and additionally reviewed by the Director and Deputy Director. In accordance with OUA above, IA will review and update, as needed, its existing procedure for athletic admission by exception.	May 2020 May 2020
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.	OUA will establish controls to ensure that an acceptable rationale for identifying an applicant for admission by exception consideration is documented for each applicant, as part of policy in 4.2.	May 2020
4.4 Establish local procedures to annually monitor compliance with the campus percentage limits for admissions by exception established by Regental policy.	OUA will establish a procedure to annually monitor compliance with the campus percentage limits for admission by exception.	February 2020

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UCOP Report Recommendation	Management Response/Corrective Action Plan	Target Completion Date
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.	OUA will update and document as necessary existing conflict of interest policies and procedures that cover all individuals who are involved in reviewing admission applications and/or making admission decisions in preparation of the FY2020 application review cycle.	December 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.	OUA will ensure all individuals who are involved in reviewing admission applications or making admission decisions receive proper training on conflicts of interest, including the definition of improper influence and examples of improper influence in admissions.	December 2019

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UCOP Report Recommendation	Management Response/Corrective Action Plan	Target Completion Date
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.	OUA will clarify the guidelines and establish procedures to prohibit external readers from reviewing applications from high schools and community colleges that would be considered a conflict of interest and to disclose any current affiliations.	December 2019
5.4 Establish controls preventing individuals who perform outreach from reviewing applications from individuals with whom they have had more than routine contact.	OUA will redefine the recusal process to prevent individuals who perform outreach from reviewing applications with whom they have had more than routine contact.	December 2019
6.1 Implement controls to periodically review admissions IT system access to ensure that the level of access is aligned with job responsibilities including, at a minimum, a review of user access before each annual admissions cycle begins.	Access to the Slate admissions review system is set up new each admission cycle and OUA currently performs a limited review to determine whether the requested access is consistent with job responsibilities. OUA will strengthen its process to provide more thorough review and sufficient documentation.	December 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.	OUA currently performs quarterly reviews of access to the Slate admissions review system. OUA will strengthen its process by defining high-risk changes and providing consistent and thorough review and sufficient documentation.	December 2019

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UCOP Report Recommendation	Management Response/Corrective Action Plan	Target Completion Date
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.	The current Student-Athlete Admissions Policy allows up to 300 incoming students to be admitted as student-athletes each year. The OUA will work with the AEPE, SAAC, and IA to develop and implement a process to review and monitor the limit (at least every two years). The data will be independently reviewed after the Fall 2019 incoming class has matriculated.	December 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.	IA will work with OUA and AEPE to enhance our current policies and process for addressing conflicts of interest, including the development of a reporting structure for coaches and athletics staff to formally disclose relationships. The process will include, at minimum, a requirement to formally disclose and review any known existing relationships between an IA staff and a prospective athlete or the family. The IA Compliance Office will educate coaches and athletics staff on this policy and process.	December 2019

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UCOP Report Recommendation	Management Response/Corrective Action Plan	Target Completion Date
8.2 <u>Perform an analysis to identify categories</u> <u>of third parties</u> 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<u>. Establish a requirement for all athletics personnel to document all contact from these categories in a central repository.</u> Athletics compliance should at least <u>annually review</u> this list and investigate any questionable contact.	IA will perform an analysis to identify the categories of third parties who have a higher risk of inappropriately influencing admissions decisions. IA will enhance its current policies to require coaches and athletics staff to notify the IA Compliance Office in writing, of any instance of an unusual or inappropriate attempt generated from these categories. IA Compliance will create a central repository and a process for review of these instances and will perform a review at least annually.	December 2019
8.3 Provide regular training to athletics personnel on the conflict of interest requirements discussed in recommendations 8.1 and 8.2.	IA will develop a plan to educate coaches and athletics staff on the new policies related to recommendations 8.1 and 8.2, including the process for documenting these items. The education will be led by the IA Compliance Office in compliance sessions with all coaches, and will be reinforced during end-of-semester meetings with coaches, and at Athletics Department all-staff meetings.	December 2019

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UCOP Report Recommendation	Management Response/Corrective Action Plan	Target Completion Date
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	IA will enhance its current one-year participation policy to include documented exceptions, a formal process to seek approval for exceptions, and consequences for policy violations. The IA Compliance Office will educate coaches on the new policies, including exceptions and consequences.	December 2019
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.	IA will create and implement an agreement that will require all incoming non-scholarship student-athletes to comply with the minimum one-year participation requirement and be subject to the consequences established in the policy.	December 2019
9.3 Establish controls to ensure records supporting ongoing participation in athletics are kept current throughout the season.	The IA Compliance Office will establish controls to ensure that participation records are up to date and will periodically reinforce with coaches, the existing participation policy. Current policy requires coaches to submit monthly to the IA Compliance Office practice logs for each student-athlete's athletic participation as well as an end-of-year participation report. Moreover, coaches are required to submit a *Change of Status form* to the IA Compliance Office immediately when a student-athlete leaves a team, to enable the Compliance Office to update rosters and have accurate participation records.	December 2019

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UCOP Report Recommendation	Management Response/Corrective Action Plan	Target Completion Date
9.4 Establish controls to independently monitor compliance with the one-year minimum participation requirement for non-scholarship student athletes recommended for admission.	OUA will work with SAAC and IA to develop a process that provides independent monitoring of non-scholarship student-athlete participation and attrition for each sport.	December 2019
9.5 Provide regular training to athletics staff on the minimum participation policy requirements.	The IA Compliance Office will include training for athletics staff on minimum participation policy requirements, as part of the training to be implemented in Item 8.3.	December 2019
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.	The Athletic Director, Faculty Athletics Representative, and Chancellor's Office will work together to modify the IA Compliance Director's job description to include dual reporting lines to the Athletic Director and Campus Chief Compliance Officer, and to establish a plan for the IA Compliance Officer to have regular communication with the Chief Compliance Officer.	December 2019
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.	OUA and UDAR will work to develop a policy and protocol limiting communication regarding specific applicants while their application is in the review process.	May 2020

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UCOP Report Recommendation	Management Response/Corrective Action Plan	Target Completion Date
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.	IA will formalize its current practice of conducting a donor review for all non-scholarship recruited athletes, including a process to document these reviews prior to the student-athlete being admitted. IA will work with OUA and SAAC to develop a formal process whereby an oversight committee (likely SAAC) will review instances in which a coach wishes to recruit an athlete who is a relative of a donor or is otherwise known to the IA staff. The process will also address due diligence requirements and approval of admission decisions where donations were identified.	December 2019