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**Subject: *Donations Review (Systemwide)
Report 2021-06***

Audit & Management Advisory Services (AMAS) has completed Donation Review at UC San Diego (UCSD) as part of a systemwide review included on the approved audit plan for Fiscal Year 2020-21. The review was completed under the direction of and in coordination with the University California Office of the President (UCOP) Ethics Compliance and Audit Services (ECAS). This report summarizes the results of our review.

Background

In June 2019, UCOP ECAS issued the systemwide internal audit “Systemwide Audit of Undergraduate Admissions,” project P19A019. The audit observed that an opportunity existed for UC campuses with undergraduate programs to strengthen their controls further to reduce admissions fraud risk by monitoring donations and admissions. While the audit found that none of the UC campuses considered donations when making admissions decisions, the review recommended that campuses implement protocols to limit communication between development and admissions, and processes to periodically review large donations to the campus to identify potential admissions decisions that these donations could have influenced. The audit also recommended that internal audit periodically perform a retrospective review of donations to the campus to identify admissions decisions that could have been influenced by donations and that any questionable admissions decisions identified through this process would be referred to the Locally Designated Official (LDO) for investigation.

UCSD receives over 100,000 applications each academic year. UCSD uses a holistic review process that entails considering the full spectrum of applicant qualifications viewed in the context of an applicant’s education environment and background. This review process is based on all evidence provided in the application as well as traditional quantitative measures of academic achievement (Grade Point Average and test scores) and other pertinent qualifications, including extracurricular activities, leadership, community involvement, distinctive talents, and challenges or hardships overcome. Each application has at a minimum two independent reads by trained readers that are scored and added to the comprehensive review. If the two reader’s scores are more than one point apart, a third reader will review and score the applicant, which will be the final overriding score. This score is only one piece of the holistic review. No single factor plays a deciding role in the decision process; it is a combination of the entire student application.

UCSD has a Committee on Admissions consisting of faculty members who set the policy for Admissions to implement operationally. The Committee has delegated the authority to make the final admission decision to the Admission Selection Team, which comprises the Associate Vice Chancellor of Enrollment Management, Director of Admissions, Senior Associate Director of Admissions, and the Enrollment Management Data Analyst in consultation with Institutional Research.

Advancement at UCSD is comprised of seven departmental areas that support philanthropic partnerships. These areas include Advancement Operations and Campaign (AOC), Advancement Services, Annual Giving and Pipeline Development, Health Sciences Advancement, Leadership Strategy and Engagement, UCSD Alumni and University Development.

Audit Objective, Scope and Procedures

The objective of our review was to perform a retrospective review of donations to UCSD to identify undergraduate admissions decisions that could have been influenced by donations. Any matches identified through this process were to be analyzed, documented, and referred to the LDO to determine whether to investigate further. The scope of the review included the following:

- Donations received by UCSD during the period January 1, 2017 through October 29, 2020.
- Applications for undergraduate admission submitted from November 1, 2017 through March 31, 2020 for the 2018-19 and 2019-20 academic years (date range includes both the regular and late application periods).

To conduct this review, Internal Audit performed the following procedures:

- Interviewed appropriate personnel in Admissions and Advancement to gain an understanding of their processes and data;
- Obtained a dataset of donations received during the audit period;
- Obtained a dataset of applications for undergraduate admission submitted during the audit period;
- Performed data analysis to identify admissions of applicants who may be related to donors from the donations dataset. Data fields compared across datasets to identify “matches” included all or a subset of the following: names of donors and donors’ spouses, names of admitted students and parents, addresses, email addresses, phone numbers, foundations or businesses with the same name as the admitted student, and campus ID number. This analysis was limited to cumulative matching donations of \$10,000 or more received during the audit period;
- Reviewed data trends and other available information to assess the risk of questionable admissions decisions (i.e., those at risk of being influenced by donations) for the “matches” identified. Criteria/factors considered as part of this assessment included all or a subset of the following:
 - Dollar amount of the donation,
 - Pattern or timing of giving,
 - Applicants admitted by exception,
 - Applicants admitted to a school with impacted majors,
 - Applicants who were recommended for admission based on special talent,
 - Lack of participation in special talent for which the application was recommended,

- Low application review scores/ratings.
- Conducted weekly systemwide conference calls to help with coordination of efforts as well as to help provide a consistent approach across the campuses; and
- Provided the risk assessment results for the matches we identified to the LDO to determine whether to further investigate any of the matches.

Conclusion

Our analysis identified 21 matches of applicants admitted to UCSD who appear to be related to donors who gave a cumulative amount of \$10,000 or more during the audit period. Based on the additional assessment we performed on those matches, we referred 20 matches to the LDO to prioritize further analysis and/or investigation. One match was related to a University Official and was referred to UCOP ECAS to eliminate any potential or perceived local conflict of interest. Referral to the LDO or ECAS is not necessarily indicative of improper influence or inappropriate activities associated with the admissions decision, rather it is an indication that additional review or analysis may be appropriate.

Supporting Comments

We obtained data from three separate sources for our data analysis: UCOP Admissions, UCSD Admissions and UCSD Advancement. Both UCOP and UCSD Admission offices provided student applicant data. Advancement provided the donor data with donation details that we analyzed against the admission data. We used various data analysis tools to normalize data, conduct the analysis, including finding the matches.

Based on our analysis, we determined that 20 matches required additional analysis by UCSD, with one item referred to UCOP. Risk analysis was limited to admissions that could be associated with cumulative matching donations of \$10,000 or more received during the audit period (January 1, 2017 through October 29, 2020). For these matches, we applied additional analysis based on the following factors:

- Nature of donation – whether the donation was made to a sports program to which the applicant was admitted, or to a fund related to the applicant’s major;
- Timing of donation – whether the donation was made early enough to influence the student’s admission (i.e., before admission decisions were made);
- Donor relationship to UCSD – whether the donor was a faculty, staff, or some other UCSD affiliate;
- Participation in sport/special program – whether the applicant was admitted based on special talent and if they participated in the program; and
- Read average – whether the admitted student’s average read score¹ was below or above average for the population of admits in their admission cycle.

The risk assessment for the 20 matches was documented and provided to the LDO for further review.

¹ It was noted that transfer students are evaluated on their college coursework and therefore do not have a reader score assigned to their application.

Audit & Management Advisory Services appreciates the cooperation and assistance provided during the review.

UC policy requires that all draft audit reports be destroyed after the final report is issued.

If you have any questions regarding this report, please call me at (858) 534-1191.

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