
Internal Audit Report

Undergraduate Admissions

Report No. SC-19-09
November 2019

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I. EXECUTIVE SUMMARY

This report is prepared in conjunction with the UC systemwide audit report of Undergraduate Admissions, Project No. P19A019, dated June 2019, issued by the UC systemwide Office of Ethics, Compliance and Audit Services (ECAS). The recommendations of that report, the UC Santa Cruz management corrective actions in response to those recommendations, and the expected dates of implementation are included in the Appendix. This report contains observations, recommendations, and responses specific to the process walkthroughs at the Santa Cruz campus, and is intended to be read in conjunction with the systemwide report.

In the fourth quarter of fiscal year 2018-19, ECAS 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 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 at the Santa Cruz campus using a common audit program developed for this review 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 audit did not assess the organization's adherence to these controls. A second audit, scheduled for fiscal year 2019-20, will assess the operating effectiveness of controls identified in this review, including any effects that may be found as a result of potential deficiencies.

We observed that, in general, the campus does have controls over the admissions process to address compliance with policy. We also identified controls within athletics and admissions to address admissions fraud risk. However, we found several opportunities exist to strengthen those controls and further reduce the risk of admissions fraud in the following areas:

- Documentation supporting the admissions process
- Special talent admissions
- Admissions by exception
- Conflict of interest in admissions review and athletics
- Admissions IT system access
- Monitoring student athletes' participation in athletic programs
- Independence of athletics compliance
- Monitoring of donations and admissions

The observation and related management corrective actions are described in greater detail in section III of this report and the Appendix.

II. INTRODUCTION

Purpose

The purpose of this audit was to identify key controls in the standard undergraduate admissions process; determine Athletics' role in making admissions decisions; identify documentation practices that would substantiate student participation in an Athletics program; determine if there are other departments outside Undergraduate Admissions that make admissions decisions; and determine how fraudulent admissions could be identified. This audit was part of a systemwide effort requested by the Office of Ethics, Compliance and Audit Services at the Office of the President that provided the audit program we followed.

Background

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 athletic admissions, but 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) amended its fiscal year 2018-19 audit plan to include a systemwide audit of undergraduate admissions. The audit was performed in coordination with the internal audit departments at all undergraduate UC campuses using a common systemwide audit program.

Scope

In the fourth quarter of fiscal year 2018-19, ECAS directed all internal audit departments at campuses with undergraduate programs to set aside hours in their annual audit plans for a systemwide audit of admissions. The objective of the 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 at each of the nine UC campuses with undergraduate programs and at the Office of the President using a common audit program developed for this review 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, the review did not assess the organization's adherence to these controls. A second audit, scheduled for fiscal year 2019-2020, will assess the operating effectiveness of controls identified in this review, including any effects that may be found as a result of potential 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 and 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

III. OBSERVATIONS, RECOMMENDATIONS, AND REPOSSES

Based on a walkthrough of the undergraduate admissions process at UC Santa Cruz using the common audit program developed by ECAS, we observed opportunities for improvement in the following areas:

DOCUMENTATION SUPPORTING THE ADMISSIONS PROCESS

The campus has documented some admissions-related policies and procedures, however they may not be of sufficient breadth and depth to promote both systemwide and local policy objectives and mitigate process irregularities.

The Office of Undergraduate Education will develop and implement local procedures to document all aspects of the application evaluation and admissions process.

See Recommendation and management corrective action - Appendix A, section 1.1 and 1.2.

EARLY REVIEW AND NOTIFICATION PROCESS (Special Talent Admissions)

The Office of Undergraduate Admissions provides the Senate Committee on Admissions and Financial Aid holistic review scores for the consideration of recommendations from the five academic divisions and the athletics department that are based on special talent. The process is documented, but we found that the supporting documentation is not always sufficient to ensure that the special talent is verified and legitimate.

The offices of Undergraduate Education and Enrollment Management will establish and document the minimum requirements for documented verification of special talent for each department

See Recommendation and management corrective action - Appendix A, section 3.2, 3.3, 3.4, 3.5, and 3.6.

ADMISSIONS BY EXCEPTION

Admissions by exception is the policy under which the campus may admit an applicant who does not meet the minimum UC requirements for admission, but who demonstrates high potential for academic success. Regental policy establishes a 6% enrollment limit for freshman and transfer admissions. The campus exceeded the admissions by exception limit in two of the previous five application years.

The office of Enrollment Management will establish and document a procedure to annually monitor compliance with the admissions by exception limit.

See Recommendation and management corrective action – Appendix A, section 4.2, 4.3, 4.4.

CONFLICT OF INTEREST IN ADMISSIONS REVIEW & ATHLETICS

The campus has some procedures in place to reduce conflicts of interest in the admissions process, however they could reduce the risk of fraudulent admissions by further developing and documenting local policies and procedures.

The Office of Undergraduate Admissions and the Athletics department will develop and implement a comprehensive set of policies and procedures that cover all individuals who are involved in the admissions process.

See Recommendation and management corrective action – Appendix A, section 5.1, 5.2, 5.3, 5.4, 8.1, 8.2, 8.3.

ADMISSIONS IT SYSTEM ACCESS

Activity in the campus admissions IT system is logged, however, controls should be implemented for periodic checks of the IT system access rights and high-risk changes.

The Office of Undergraduate Admissions will conduct a system access audit periodically and will monitor and review high-risk changes.

See Recommendation and management corrective action – Appendix A, section 6.1, 6.2.

MONITORING STUDENT ATHLETES' PARTICIPATION IN ATHLETIC PROGRAMS

There are no established requirements for a minimum period of participation in athletics programs for student athletes.

The director of Athletics will establish a policy for minimum participation.

See Recommendation and management corrective action – Appendix A, section 9.1, 9.2, 9.3, 9.4, 9.5.

INDEPENDENCE OF ATHLETICS COMPLIANCE

The campus athletics compliance officer provides oversight and guidance within the department. The officer does not have a reporting relationship independent of the athletics director, making that position vulnerable to undue influence.

A reporting line will be created from the athletics compliance officer to the campus ethics and compliance officer (CECO).

See Recommendation and management corrective action – Appendix A, section 10.1.

MONITORING OF DONATIONS AND ADMISSIONS

The campus does not consider donations to the campus or applicant alumni relations when making admissions decisions. To provide additional assurance that admissions decisions are not influenced by such factors, policies should be implemented to limit communication between development and admissions.

The Office of Undergraduate Education and University Relations will establish a policy limiting communication between development personnel and the Office of Undergraduate Admissions regarding admissions matters. In addition, a donation review process will be performed for recruited athletes.

See Recommendation and management corrective action – Appendix A, section 11.1, 11.2.

APPENDIX A – RECOMMENDATIONS AND MANAGEMENT CORRECTIVE ACTIONS

Appendix A		
Systemwide Audit of Undergraduate Admissions Management Corrective Actions – UCSC		
Recommendation	Management Corrective Action	Target Date
<p>1.1 Document any local policies and develop detailed procedures for all aspects of the application evaluation and admissions process, to include the following:</p> <ul style="list-style-type: none"> ● 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 	<ul style="list-style-type: none"> ● Procedures will be developed to document all aspects of the admissions process. Currently there are some policies and procedures in place. The Campus Faculty Committee overseeing Admissions and Financial Aid (CAFA) develops campus policies and procedures rooted in Regental/BOARS policies. Those policies include UC Santa Cruz Policy for Frosh Admission by Exception, UC Santa Cruz Frosh Holistic Review, CAFA’s Policy for Frosh Admission – Holistic Review, Transfer Major Preparation, Transfer Admissions Guarantee, UC Admissions Requirements. Reader reference materials include the UC Comprehensive Review Factors (14 factors for consideration of freshman applicants). Internal Audit has reviewed the above documentation. ● Recommendation is currently in place and part of current practice. Recorded by Admission freshman readers and transfer evaluators in UC Review and local Academic Information System (AIS) for freshman and transfers. Readers award a score of 1 (Best), 2, 3, 4, 4.50, 5 or Deny to each freshman applicant based on the rubric defined by CAFA. The process is documented and Internal Audit reviewed the documentation ● Recommendation is currently in place and part of current practice – Applications receive one human read and a second evaluation via the Student Success Indicator (SSI), which is a predicted first year GPA. Those without an SSI (a very small population) receive a second human read. These two independent documented evaluations support the decision to admit. All 14 UC criteria are incorporated into the holistic review. The process is documented and Internal Audit reviewed the documentation. 	<p>12/31/19</p> <p>Admissions Director</p>
<p>1.2 Document all admissions decisions with sufficient detail to:</p>	<ul style="list-style-type: none"> ● Recommendation is currently in place and part of current practice. The campus documents the criteria considered in application evaluations and maintains 	<p>N/A</p> <p>Recommendations are currently in place</p>

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<ul style="list-style-type: none"> ● 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 	<p>documentation of application evaluations consistent with comprehensive review requirements which demonstrates application of criteria in the evaluations results.</p> <ul style="list-style-type: none"> ● Currently readers evaluate the applications and those evaluation scores are recorded in the local Academic Information System (AIS). The reader who assigned the score is captured in the holistic review tool. Admissions will work with the systems team to ensure that the reader who assigned the score is also indicated within AIS. CAFA, VP Dean of Undergraduate Education (VPDUE), AVC Enrollment Management (EM), and Admissions Director determine final selection criteria. Those lists are documented with list snap shots and maintained by Enrollment Management. Final decisions are made by CAFA. Those decisions are documented with snap shots and maintained by EM. 	<p>and policies and procedures were reviewed by Internal Audit.</p> <p>12/31/19</p> <p>Admissions Director</p>
<p>3.2 Clearly identify and track all applicants that departments recommend on the basis of special talent.</p>	<ul style="list-style-type: none"> ● Recommendation is currently in place and part of current practice – Special talent early review and notification process is tracked and maintained in a spreadsheet. The Dean of Undergraduate Education creates a Google Doc sheet that he provides to the 5 Academic Deans and the Athletics Director. Those parties use the form to submit nominations to the UE Dean. It includes the student contact information, nominator information, a brief description of the applicant’s special talent or achievement, a brief description of prior contact with the applicant, a brief description of any potential perceived conflicts of interest, and a brief description of any connections to development or fundraising. 	<p>N/A</p> <p>Recommendations are currently in place and policies and procedures were reviewed by Internal Audit.</p>

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<p>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.</p>	<ul style="list-style-type: none"> • Vice Provost/Dean of Undergraduate Education and Associate Vice Chancellor Enrollment Management, with input from the Athletics Director and the Deans of the five departments, will establish and document the minimum requirements for documented verification of special talent for each department. These minimum requirements will identify the types of information and trusted sources that can be used to confirm qualifications or credentials for a specific sport or talent. 	<p>12/31/19</p> <p>Vice Provost/Dean of Undergraduate Education and Associate Vice Chancellor Enrollment Management</p>
<p>3.4 Require a two-step verification process for any recommendation for admission on the basis of special talent that includes the following:</p> <ul style="list-style-type: none"> • 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 <p>For athletics, this process could be limited to non-scholarship prospective student athletes.</p>	<ul style="list-style-type: none"> • An additional section will be added to the google sheet used for special talent recommendations. The special talent recommenders will document the assessment of special talent and will attest under penalty of disciplinary action on the google sheet for special talent submissions that they have performed an assessment of the applicant and have determined that the level of special talent warrants a recommendation for admission. That attestation will be documented on the special talent recommendations google sheet. Each division and athletics has a committee that reviews and assesses special talent nominees. • Recommendation is currently in place and part of current practice. Each of the Deans of the five academic divisions and the Athletics Director approve and document their division/department recommendations for admissions on the basis of special talent. 	<p>12/31/19</p> <p>VPDUE and AVC EM</p>
<p>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.</p>	<ul style="list-style-type: none"> • The athletic compliance office will establish and document minimum requirements for documented verification of special talent. Documentation will include how the special talent has been verified and a list of sources that were used to verify the athletic qualifications. Verification of qualifications will be required and the minimum level of verification for athletics will be the level determined by the Athletics Committee. The special talent recommendation google sheet will include a section where the athletic director will document that the 	<p>12/31/19</p> <p>VPDUE/AVC EM and Athletics Compliance Officer</p>

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	applicant’s athletic qualifications have been verified. The athletics department will maintain all documentation of verification of athletic qualifications.	
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.	<ul style="list-style-type: none"> Recommendation is currently in place and part of current practice – Special talent early review and notification includes VPDUE, Admissions Director, and CAFA. The VP/UE Dean reviews the recommendations and also looks for conflicts of interest, any connections to development or fundraising. The list then goes to the Admissions Director for additional review. She looks for anything that stands out or missing information. The google sheet list then goes to CAFA where the final approval and decision is made. CAFA approval and final decisions are documented on the google sheet and list snap shots of the final decision list are maintained by Enrollment Management. 	N/A Recommendations are currently in place and policies and procedures were reviewed by Internal Audit.
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.	<ul style="list-style-type: none"> Currently readers read and score only. Decisions for groups of students, not individual students, are made by CAFA. Local campus policy outlines acceptable rationale and the required evaluation process for admissions by exception. This policy is updated before every fall enrollment period by CAFA. This document is used by the readers in the application review process. In this document, the UC guidelines provided by BOARS on A by E are summarized and CAFA’s local A by E policy is stipulated. CAFA expects the Office of Admissions to follow this policy document and ensure that reporting of A by E cases conform to the requirements issued by the UC Office of the President. The policy will be updated to ensure that an individual who identifies a candidate for admission by exception cannot make the final admission decision. 	12/31/19 Admissions Director and CAFA
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.	<ul style="list-style-type: none"> Recommendation is currently in place and part of current practice – This is coded within the UC Review tool and AIS. Local documented policy and procedure are the UC Santa Cruz Policy for Frosh Admission by Exception which is updated annually by CAFA. Readers are trained on the policy and they have a copy of the policy for reference as part 	N/A Recommendations are currently in place and policies and procedures were reviewed by Internal Audit.

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	of their application review. When the reader reviews the application they apply an HR score and also determine that the applicant has not satisfied all of the eligibility requirements, but who exhibit potential success. They identify what “the applicant would require” to satisfy the criteria. They choose an A by E reason from a drop down list. They refer to the A by E policy mentioned above. The A by E policy provides the framework for what is and is not allowed. Within the HR tool (during the review of individual applicants) staff must indicate the applicant would need admission by exception and the reason for that. The A by E policy details the various evidence that should be reviewed in the application that might satisfy the missing requirement. Most information is available in the application.	
4.4 Establish local procedures to annually monitor compliance with the campus percentage limits for admissions by exception established by Regental policy.	<ul style="list-style-type: none"> A procedure will be established and documented to annually monitor compliance with the campus percentage limits for admissions by exception established by Regental policy. 	<p>12/31/19 After official census and incorporate into selection file by March 2020.</p> <p>Associate Vice Chancellor of Enrollment Management and Enrollment Management Analyst</p>
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: <ul style="list-style-type: none"> 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 	<ul style="list-style-type: none"> Currently the annual CAFA policy “UC Santa Cruz Frosh Holistic Review” states that readers will not read or score applicants with whom they have any association, including personal or professional. Readers will not read or score any application from a school in which they provide service. Readers will not read or score any application which they believe they are unable to score fairly. All such applications will be assigned to another reader. Additional language will be added to the policy to document conflict of interest policies and procedures that cover all individuals 	<p>12/31/19</p> <p>Admissions Director will develop and will implement with AVC EM</p>

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<p>reviewing applications associated with these potential conflicts</p> <ul style="list-style-type: none"> ● Attest that they are not aware of any attempt to improperly influence an admissions decision. 	<p>who are involved in reviewing admissions applications or making admissions decisions.</p> <ul style="list-style-type: none"> ● A new policy/document will be created requiring recusal of anyone involved in applicant selection decisions for applicants known to them. The policy will require disclosure of 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 ● Language will be added to the confidentiality agreement referencing freshman reviewer's agreement to recuse themselves from reading applications of students known to them. The policy will require disclosure of 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 ● An attestation form will be created for readers to sign saying that they are not aware of any attempt to improperly influence an admissions decision. 	

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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.	<ul style="list-style-type: none"> Currently regular training is provided for all internal and external readers who are involved in reviewing admissions applications or making admissions decisions, including training regarding conflicts of interest and associated requirements. The training includes the definition of improper influence and provides examples of improper influence in the context of admissions. Readers annually participate in a one week reader training and must pass a certification process. The only other individuals who are involved in the admissions review or decision process is CAFA. A regular training process regarding conflicts of interest and associated requirements will be implemented for CAFA. The training will include the definition of improper influence and provide examples of improper influence in the context of admission. The training will be added to the annual CAFA orientations. 	12/31/19 CAFA Chair and AVC EM
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.	<ul style="list-style-type: none"> This is documented in the review tool. The HR tool captures this data already, but it will be added to the confidentiality agreement. The Admissions Director will discuss this with UC Davis as to how this can be implemented. 	12/31/19 Admissions Director
5.4 Establish controls preventing individuals who perform outreach from reviewing applications from individuals with whom they have had more than routine contact.	<ul style="list-style-type: none"> The HR tool captures this data. The Admissions Office will add language to the outreach individuals' confidentiality agreement stating that they are prevented from reviewing applications from individuals with whom they have had more than routine contact. In addition, the Admissions Office is exploring ways to establish and implement controls to prevent individuals who perform outreach from reviewing applications from individuals with whom they have had more than routine contact. 	12/31/19 Admissions Director Ongoing
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	<ul style="list-style-type: none"> The Admission Office will conduct a system access audit prior to each evaluation cycle. The audit will review admissions IT system access to ensure that the level of access is aligned with the individual's job responsibilities. 	October 2019 Admissions Director and systems staff

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before each annual admissions cycle begins.		
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.	<ul style="list-style-type: none"> Activity in admissions IT systems is presently logged. The Admissions Office will define high-risk changes (such as admissions decision changes) and develop and implement strategies for identifying those high-risk changes. The Admissions Office will monitor and periodically review the defined high-risk changes. 	12/31/19 Admissions Director and systems staff
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.	<ul style="list-style-type: none"> Not applicable 	
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.	<ul style="list-style-type: none"> The Athletics director will review current policies regarding 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. The Athletics director will develop and/or refine current policies to address the recommendation. 	3/31/20 Athletics Director
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	<ul style="list-style-type: none"> The Athletics director will review current practices and develop and/or refine them. The Athletics director will need to define what is “unusual”. 	3/31/20 Athletics Director

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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.		
8.3 Provide regular training to athletics personnel on the conflict of interest requirements discussed in recommendations 8.1 and 8.2.	<ul style="list-style-type: none"> The Athletics director will review and add to current training. 	12/31/19 Athletics Director
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: <ul style="list-style-type: none"> Any exceptions to this requirement Approval requirements for any exceptions to the policy Consequences for violating the policy 	<ul style="list-style-type: none"> A policy will be established requiring a minimum of one year of participation in an athletic program for non-scholarship student athletes recommended for admission by the athletics department. The policy will include any exceptions to the requirement, approval requirements for any exceptions to the policy, and consequences for violating the policy. 	12/31/19 Athletics Director
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.	<ul style="list-style-type: none"> CAFA and the incoming CAFA Chair will review this recommendation in the fall and will make a decision by 10/31/19 to implement or not. 	CAFA will review the recommendation and make an implementation decision by 10/31/19.
9.3 Establish controls to ensure records supporting ongoing participation in athletics are kept current throughout the season.	<ul style="list-style-type: none"> Controls will be established to ensure records supporting ongoing participation in athletics are kept current throughout the season. 	12/31/19 Athletics Director
9.4 Establish controls to independently monitor compliance with the one-year minimum participation requirement for non-scholarship student athletes recommended for admission.	<ul style="list-style-type: none"> Controls will be established to independently monitor compliance with the one-year minimum participation requirement for non-scholarship student athletes recommended for admission. 	12/31/19 Athletics Director
9.5 Provide regular training to athletics staff on the minimum participation policy requirements.	<ul style="list-style-type: none"> Current athletics staff training will be expanded to include regular training on the minimum participation policy requirements. 	12/31/19 Athletics Director

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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.	<ul style="list-style-type: none"> The Athletics director and the VC BAS will develop a reporting line from the Athletics Compliance Officer to CECO and update the job description. 	12/31/19 Athletics Director and VC BAS
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.	<ul style="list-style-type: none"> A policy will be established to limit communication between development personnel and the Admissions Office regarding admissions matters. At a minimum, any communication regarding the admission status of specific applicants will be prohibited. Admissions matters are defined as items related to the admissions status or potential influence of admission, not yield event coordination, parent programs, campus visits. 	12/31/19 VPDUE and VC University Relations
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 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.	<ul style="list-style-type: none"> A review will be performed 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. Senior leadership from Undergraduate Education and Enrollment Management will identify an independent senior leadership member or committee to oversee the review process including determination of any due diligence required when donations are identified, and approval of any admissions decisions for which donations are identified. The VC University Relations has identified the University Relations Assistant VC of University Development Programs to assist with the donation review process. 	1/31/20 VPDUE and AVC EM