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AUDIT AND ADVISORY SERVICES
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April 10, 2020

To: Lisa Przekop, Director
Office of Admissions

Re: **Undergraduate Admissions – Phase 2**
Audit Report No. 08-19-0021

We have completed Phase 2 of the Undergraduate Admissions audit. This audit was included in the 2019-20 annual audit services plan, as coordinated by Ethics, Compliance, and Audit Services. The audit was conducted in conformance with the *International Standards for the Professional Practice of Internal Auditing*. Enclosed is the report detailing the results of our work.

We sincerely appreciate the cooperation and assistance provided by personnel in the Office of Admissions, Intercollegiate Athletics, College of Creative Studies, Department of Music, Department of Theater & Dance, and Student Information Systems & Technology.

Respectfully submitted,

Ashley Andersen
Director
Audit and Advisory Services

Enclosure

cc: Chancellor Henry Yang
David Marshall, Executive Vice Chancellor
Margaret Klawunn, Vice Chancellor Student Affairs
Mike Miller, Assistant Vice Chancellor Enrollment Services
John McCutcheon, Director Intercollegiate Athletics
Prof. Michael Gordon, Committee Chair on Admissions, Enrollment & Relations with Schools
Chuck Haines, Assistant Chancellor for Finance and Resource Management
UCSB Audit Committee
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UC SANTA BARBARA

UCSB Audit and Advisory Services

Internal Audit Report

Undergraduate Admissions – Phase 2

April 10, 2020

Performed by:
Antonio Mañas Melendez, Associate Director
Gifty Mensah, Senior Auditor

Approved by:
Ashley Andersen, Audit Director

Report No. 08-19-0021

EXECUTIVE SUMMARY

OBJECTIVE

The overall objectives of the Undergraduate Admissions Phase 2 Audit (Phase 2) were to assess the campus adherence to controls over Undergraduate Admissions, the effectiveness of campus policy and controls over Undergraduate Admissions, and identify any effects of deficiencies in campus controls over Undergraduate Admissions. In Phase 1 of the Undergraduate Admissions audit (Phase 1), we assessed the design of controls over the admissions process and related processes. The final report for the Phase 1 audit was issued on August 26, 2019.

The scope of Phase 2 was limited to the review of the operating effectiveness of controls for Undergraduate Admissions for fall 2016 through spring 2019 in the following areas:

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

The audit also reviewed the design of controls over the Admissions Appeal process.

CONCLUSION

Based on the results of our work performed within the scope, we found that opportunities exist to strengthen these controls to further reduce the risk of admissions fraud in the following areas:

- Classification and tracking of Special Talent Admissions
- Support documentation of Special Talent Admissions
- Admissions by Exception approvals
- Admissions IT system access and activity logs
- Monitoring student athletes' participation in athletic programs
- Admissions Appeal Process

These opportunities for improvement are detailed in the remainder of the audit report. The recommendations, management corrective actions and the expected dates of implementation are referenced in the Appendix.

OBSERVATIONS, RECOMMENDATIONS, AND RESPONSES

1. DOCUMENTATION SUPPORTING THE ADMISSION DECISION PROCESS

OBSERVATIONS

The Office of Admissions is the only department with the authority to make final admission decisions. Office of Admissions uses two computer systems, UADM and Inside Admissions[1], to document and track the admissions decision-making process. We found that admissions decisions are overall properly coded in these systems and supported by notes, and comments.

During the review, we observed departments that made recommendations based on special talent, submit[2] a list of recommended applicants. In our sample testing, all applicants admitted by special talents were included on these lists. However, the support documentation of special talent applicants was not retained or did not provide adequate evidence of special talent skills in a consistent manner. This issue will be explained in more detail in other sections of the report.

We noted, in fulfillment of the admission decision on athletic slot utilization from Phase 1 review, the campus Committee on Admissions, Enrollment, and Relations with Schools (CAERS)[3] has established the Athletic Admissions Review Committee (AARC) that would also review all athletics slot requests. This committee will operate as an additional control point; the Office of Admissions will continue making final decisions.

Recommendation and management corrective action. Please see table in Appendix Section A.1 and A.2.

2. SPECIAL TALENT ADMISSIONS

OBSERVATIONS

We evaluated the operating effectiveness of identified controls over Special Talent Admissions, which consist of admitted applicants who received recommendations based on demonstrated ability in fields such as athletics or the arts. We found a need to improve the identification of applicants admitted by special talent and the documentation substantiating special talent.

Intercollegiate Athletics (ICA) and certain academic units, such as the College of Creative Studies (CCS), Department of Theater and Dance, and Department of Music provide Office of Admissions with recommendations for applicants that they have identified as having athletic qualifications or other special talents, respectively.

[1] A campus-built system providing evaluators with multiple screen views of the data obtained from the applicant and a system used by readers to review the full applications respectively.
[2] Recommendations are sent by email communication or using a cloud service application.
[3] CAERS - sets standards for Undergraduate Admissions and advises the Senate and the administration regarding policy and procedures related to admissions, enrollment, access, and relations with schools.

Classification and Tracking of Special Talent Admissions

We found that Special Talent Admissions applicants are overall identified and tracked in a centralized computer system by the Office of Admissions. However, current codification in the system does not fully identify all applicants admitted by Special Talent Admissions. The reason is that there is not a clear distinction between applicants who are competitive to be admitted in the regular process and applicants who meet minimum requirements but need a Special Talent Admissions recommendation in order to gain admission.

Documentation Supporting Special Talent

We selected a sample of 25 Special Talent Admissions and confirmed the identified issues in the Phase 1 audit regarding the adequacy of documentation supporting Special Talent Admissions recommendations, specifically we observed the following:

- The documentation supporting special talent admission recommendations is not always sufficient to ensure that the special talent is verified and legitimate. For example:

    - Athletics has three main types of documentation: release notes, newspaper articles, and links to social media. In our testing, we determined that release notes were not relevant sources to prove athletic skills. Three (One from NCAA[4] and two from UCSB) applications were supported with press releases informing that the student would participate as an athlete, which we do not consider evidence to prove athletic skills. Ten applications were supported with news articles and other documentation that we consider reliable sources.

    - Department of Theater and Dance, and Department of Music use panel members' evaluation records of auditions to prove special talent. Of the sample, we found the departments did not retain four evaluation records (two each per department). We also found opportunities to improve the current template to avoid modification or alteration of audition results.

    - CCS uses an online application to evaluate and make decisions on applicants. We found all applicants' evaluations were documented in the system. However, we were informed that the system does not maintain logs of changes; and evaluators manually identify themselves for comments or decisions. The department informed as that they have rectified and improved the audit logs and the workflow process. We could not confirm the improvement at this date.

- Departments communicate recommendations for Special Talent Admissions to the Office of Admissions through a list[5]. However, Office of Admissions does not obtain and review the results of the auditions or faculty evaluations of applicants, with the exception of athletics, to ensure the recommended applicants actually passed the auditions or supplemental evaluation. In implementing recommendations from the Phase 1 audit, the Office of Admissions has begun the review of auditions results and faculty evaluations of applicants they recommend for admission.

[4] NCAA - National Collegiate Athletic Association.
[5] List - Applicants who have passed auditions and faculty evaluation, or slot request for athletes.

- For athletics, in addition to the list, the head coach and Assistant Athletic Director, Student Services sign a Special Admit Form[6] for all recommended athletes on the list and Office of Admissions verifies the athletic skills through a web search. We found in one case that there were email communications from the Assistant Athletic Director, Student Services on a slot request. However, the head coach did not sign the Special Admit Form for this request.

- Department chairs always include a support letter for applicants they recommend by special talent who need to be admitted by exception[7]**.** However, we found that the support letter from the Chair of the Department of Theater and Dance in support of one applicant did not include wet signatures as expected.

Recommendation and management corrective action. Please see Appendix Section C.1 and C.2

3. ADMISSION BY EXCEPTION

OBSERVATIONS

We evaluated the operating effectiveness of identified controls over Admissions by Exception, including the rationale by which the campus identified a given applicant for consideration and the approval process. We found that the evaluation of international students admitted by exception could involve only one person under specific circumstances. Additionally, not all Admissions by Exceptions applications are approved by the director or associate directors in the Office of Admissions. Currently, Office of Admissions has implemented three signatories for admission by exception cases starting for the Fall 2020 applications.

We randomly selected and evaluated 25 samples of applicants admitted by exception during the review period and determined whether they were properly identified, classified and approved.

Accuracy of Classifications and Rationale

We observed that Office of Admissions explicitly documents the exceptional characteristics that lead to an applicant being considered for Admission by Exception and that the rationale for identification of applicants into Admission by Exception met the UCSB eligibility criteria[8] and the UCSB special action codes[9]. However, we found a minor issue with the update of the classification of three applications admitted by exception after additional information was received. We noted that in all the cases, the classification and rationale used to identify the applicants were legitimate based on the available information. For example,

- In one case, the applicant's admission status should have been changed to regular admission.

[6] Special Admit Form - A form that is completed and signed off by the Head Coach and Athletic Compliance when requesting an athletic slot.
[7] Special Talent Admissions test included Admissions by Exception applications based on special talent.
[8] UCSB Eligibility codes are indicators evaluators or the system used to identify applicants to be considered for Admission by Exception.
[9] Special Action codes are used to explain the rationale identified for the eligibility codes.

- In two cases, the type of Admissions by Exception should have been updated from subject deficiency to special talent.

Approval Process

We noted that applicants in Admissions by Exception are overall independently reviewed and approved by someone other than the individuals who identified them for consideration. In addition, the final approver usually is the Director of Admissions or one of the two associate directors in the Office of Admissions, as defined in local procedures. However, we found:

- Two instances where the individual who identified the candidates was the same as the final decision-maker. One of these is an evaluator who handles international applications and has been trained in the grading system of that specific country.

- Eight instances, most of them were transfer applicants, where the Director of the Office of Admissions or the two associate directors did not approve the application in the system. In all these cases, two or more evaluators reviewed the application.

Recommendation and management corrective action. Please see Appendix Section D.3

4. ADMISSIONS IT SYSTEM ACCESS

OBSERVATIONS

We evaluated the effectiveness of controls to track access and user activity in the Office of Admissions' systems. We found opportunities to improve the support documentation for access changes and to determine whether there is a need for access for IT personnel to the production environment. We also found a need to identify and document current audit logs and to determine if additional audit logs should be implemented to keep track of critical field modifications.

Support Documents and Review of User Access

We sampled 25 user accounts (11 for UADM and 14 for Inside Admissions systems) and determined whether sufficient controls exist to ensure that access control to the system is appropriate, properly approved and periodically reviewed. We found that there is no formal request and approval from supervisors to grant access, specifically:

- Access for new hires into the department is granted based on job roles and responsibilities. Individuals outside the department sometimes request through email or an online system. We identified three requests (outside the department) were supported by emails. The department could not provide the email for one of the requests.

- The Business System Analyst is the authorizer of the access and informally periodically reviews access. For effective control, the review should be formalized and performed periodically.

Roles and Responsibilities

We analyzed job descriptions for the 25 samples to determine if the level of authorized user access (such as differences in read and write permissions) is aligned with job responsibilities. We found that job descriptions overall were too generic to determine the access level in the system needed to perform their responsibilities. For example:

- Seven users' job descriptions did not support "Execute" functions to perform their roles. However, their access was justified by the department.

- Three users were developers with access to the production environment. Best practices suggest the separation of production environment from developers.

Recommendation and management corrective action. Please see Appendix Section E.1 and E.2

Audit Logs

We evaluated the capabilities of these systems to track user activity, including modifications of data and found that there are audit logs to track some critical operations such as decision maker's user id and approval dates. However, several audit logs are not well documented, and they are only reviewed in exceptional circumstances.

Additionally, we found limited audit logs in student data shared with the computer system used by the Registrar's Office. Specifically, there is no audit log to track changes in a data field shared by the UADM and the system used by Office of the Registrar (STAR)[10] to identify student athletes. Through STAR, it is possible to modify the value of the field used to identify student athletes without leaving a trail. The modification of this field would not affect the admissions decision and evaluation process. However, it could have effects on the registration process.

Recommendation and management corrective action. Please see Appendix Section E.3

5. MONITORING STUDENT ATHLETES' PARTICIPATION IN ATHLETIC PROGRAMS

OBSERVATIONS

Our review evaluated the effectiveness of identified controls over student athlete participation. We confirmed that the campus has not established or enforced minimum participation for student athletes admitted by slot. Additionally, student athletes' participation is monitored at the team level and not individually.

Minimum Participation Requirements

In Phase 1, we recorded that the campus lacks a participation requirement to enforce athletic participation for a minimum period. In Phase 2, we confirmed that the campus has not enforced student athletes admitted by slot to participate for a minimum period in a sports program.

[10] STAR - is a system that is used to access current student data. It interfaces with some of the admission's IT systems and is under the purview of the Office of the Registrar.

We selected a sample of 25 student athletes admitted by slot and found that six student athletes quit their teams before one year of participation without a documented justification and one was missing on an active team roster. However, as mentioned, the campus did not establish minimum participation requirements for student athletes admitted by slot.

During the Phase 2 Audit, any athlete admitted by slot, but whose name may not have appeared on an active team roster, is being further reviewed by the campus to ascertain if further investigation is warranted.

Tracking Athletes' Participation

We noted that before the introduction of ARMS[11] in the 2018 academic year, there was no efficient record of monitoring athletes' participation on the team. Support documentation for participation was not standardized.

Currently, Intercollegiate Athletics uses ARMS to track practice logs daily through the Individual Countable Athlete Related Activities (CARA)[12]. We were informed that athletes and coaches' confirmation is done on a weekly basis. However, a percentage of athletes on the team are required to confirm the accuracy of the weekly participation summary on behalf of the entire team.

Recommendation and management corrective action. Please see Appendix Section F.1.

6. ADMISSIONS APPEAL PROCESS

OBSERVATIONS

During the review, we performed a walkthrough of the appeal review process to ensure if adequate controls exist to enforce consistency in the review process. We found that the review of the Admissions Appeal Process has not been documented to enforce consistency in the review and approval of all appeal cases.

We were informed that the University is implementing an online appeal application process to better control the application deadline. The online system will now accept two scores for appeal reviews, which the department will average and rank. The approval decisions will be based purely on the average score from the highest to the lowest, and acceptance is based on availability.

We were also informed that the three people who can review appeals are the Director and the two Associate Directors, but only two of them are necessary to review an appeal. These review procedures have not been documented.

Recommendation and management corrective action. Please see Appendix Section G.1.

[11] ARMS – An online software or application for College Athletic Departments
[12] CARA - Activities and events that are athletic related

GENERAL INFORMATION

BACKGROUND

This audit is the second phase of the Undergraduate Admissions in a request on March 18, 2019, by President Napolitano that Internal Audit Departments on all UC campuses provide an independent assessment of the admission practices throughout the system. This directive was initiated in response to nationwide issues involving third parties exploiting vulnerabilities in college admissions processes specifically related to athletics.

Accordingly, in the fiscal year 2018-19, Audit and Advisory Services amended its fiscal year 2018-19 annual audit service plan to perform an advisory service regarding admission practices at UCSB (Phase 1 Audit). The Phase 1 Audit assessed the design of controls over the admissions process and related processes. The final report for the Phase 1 Audit was issued on August 26, 2019.

In accordance with the fiscal year 2019-20, Audit and Advisory Services included a Phase 2 of Undergraduate Admissions. This Phase 2 Audit assessed the operational effectiveness of controls identified in the Phase 1 Audit.

UCSB ADMISSIONS OVERVIEW[13]

Every year the Office of Admissions processes a high volume of applications. The number of applications consistently increased for the period under review. See the summary profile below:

Table 1 **UCSB Undergraduate Admissions Profile**

Academic Year	Freshman			Transfer students		
	Applied	Admitted	Enrolled	Applied	Admitted	Enrolled
FY 2017-18	81,832	26,845	4,538	16,842	9,378	2,206
FY 2018-19	92,314	29,725	5,094	17,897	10,137	2,472
FY 2019-20	93,457	27,626	4,935	18,457	9,425	2,114

Source: Auditor Analysis and UCSB Office of Institutional Research.

Table 1 provides a breakdown of the number of applications received and processed for Freshman and Transfer status for the review period. Total New Undergraduates combines Freshman and Transfer applications and the overall percentage enrolled for the academic years in Table 2.

[13] UCSB Institutional Research, Planning & Assessment at the Office of Budget and Planning website.

Table 2	Total Enrolled vs Total Applications		
Academic Year	**Enrolled Applications**	**Total Applications**	**% Enrolled Applications**
FY 2017-18	6,744	98,674	**6.8%**
FY 2018-19	7,566	110,211	**6.9%**
FY 2019-20	7,049	111,914	**6.3%**

Source: Auditor Analysis and UCSB Office of Institutional Research website.

Special Talent

As part of the comprehensive review process, the Office of Admissions considers recommendations from athletics and three academic units (CCS, Department of Theater and Dance, Department of Music) based on special talent. Applicants are identified after passing an audition, supplemental application, or recommended by a coach for a slot. These recommendations come in the form of a list of applicants who have fulfilled the departments' requirements or prospective student athletes.

These applicants are included in the regular admit code when they meet UC minimum requirements. Departments provide letters of support for applicants that do not meet the UC minimum requirement. Athletics department submits review forms for applicants that meet UC minimum but were not selected by UCSB selection for that year. The Director of Admissions reviews the support letters and evaluates the likelihood that the applicant could be successful in courses outside of the major or sport. Final Admission decisions are the responsibility of the Director of Admissions.

Admission by Exception

UCSB uses 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 athletics, music, dance, and other abilities), applicants with US Military Service, or students with academic deficiencies who have demonstrated potential to succeed academically at the University. Applicants that UCSB considers for Admission by Exception undergo an additional qualitative review beyond the comprehensive review used to determine initial admissibility.

UCSB Eligibility codes are indicators evaluators or the system use to identify applicants to be considered for Admission by Exception. The Office of Admissions uses Special Action codes to explain the rationale identified for the eligibility code.

Each group of applicants is assessed during the Comprehensive Review process for both their academic record and supplemental factors along with the rest of the applicant pool. Should an applicant appear to be academically ineligible for admission, and still competitive /selective for admission for the campus based on the Comprehensive Review process, they are reviewed again by senior staff for possible Admission by Exception. If approved for Admission by Exception the applicant is manually admitted in UADM and appropriate notes are made. Official records (transcripts) are verified at the point of enrollment and Admission by Exception forms are signed at that time.

Compliance with Assembly Bill 1383[14]

In October 2019, the California Legislature enacted Assembly Bill (AB) 1383, which requires that each student admitted to the University of California by exception be approved by a minimum of three senior campus administrators. Further, the campus must document those involved in the evaluation of student applications and establish a policy that applies articulated standards to the campus' Admissions by Exception decisions. For student athletes admitted by exception, the student is required to participate in the athletic program for a minimum of one academic year. Plans are under development to ensure compliance for the 2021-22 academic year.

Admission IT systems

UCSB uses a variety of IT systems as part of the admissions process, and grant varying levels of system access to both admissions and IT personnel depending on job responsibility. These include UADM, Inside Admissions and UC Review[15]. Administrative users for UADM indirectly, through Student Information Systems & Technology (SIS&T) Identity Management Web Application, use a service called the Security Administration Service, which is developed and maintained by Student Affairs developers for the management of user authorization data within various applications. Access to users within the Office of Admissions is granted based on job roles. Users outside of the Office of Admissions staff may request access through the Office of the Registrar access approval system.

System users are periodically reviewed to ensure user access is still needed and that the user is still employed by the University. Any outdated or unauthorized access would be reviewed/removed.

There are audit logs to track critical operations such as approvals and additional logs to identify writes to the database. The information recorded is object type, object key, modification action, modification date and a session id of the logged-in user that is making the change.

Athletic Participation and Monitoring

In the spring, annually ICA completes a declaration of roster for each sport program. The declaration of roster process includes all incoming (admitted) and returning student athletes. The declaration of the roster is reviewed by:

- ICA coach
- Compliance staff
- Academic staff
- Sports Medicine staff
- Sport supervisor

The declaration of roster ensures that all student athletes (incoming and returning freshman and transfers) are identified on the active roster appropriately in the ARMS system and the UCSB Registrar's system. The roster from the previous year is compared along with the list of student athletes admitted via slot request to ensure accuracy in the roster declaration. Additionally, the

[14] New bill passed to control minimum approval requirement for admission by exception cases.
[15] UC Review is a system built by UC Office of the President to review detailed academic information for transfer applicants.

coach from the respective sport will confirm any additional new student athletes that they were admitted through the regular admit process (admitted without slot).

The active roster is utilized for the following processes inclusive of but not exclusive to:

- Completion and approval of University/Department and NCAA required forms.
- Confirmation of eligibility in the NCAA eligibility center portal and for transfers, confirmation of receipt of the required NCAA tracer from the former institution.
- Compliance meeting – All student athletes have a required in-person meeting with compliance staff before the student athlete can be eligible for participation.
- Sports Medicine clearance/physicals – All student athletes are required to have sports medicine clearance before participation in a sport.
- Academic certification – The Certification Officer in the Office of the Registrar must complete the appropriate paperwork and confirm the certification of NCAA eligibility before a student athlete may participate in the competition.
- Calendars – The NCAA requires rosters to be identified along with the team's CARA detailed with a start date, end date, and roster on the team calendar in ARMS.

There is a variety of approval processes:

- Housing Form – Signed by the student athlete and ICA compliance.
- Advising Approval Form – Signed by the student athlete and College of Letters and Science Academic Advisor.
- Athletic Training Workflow – Signed by the student athlete and Certified Athletic Trainer from the sports medicine team.

Team Calendars and Individual Student Athlete CARA

Per NCAA policy, all programs must update their team calendar that is viewable for coaches, student athletes and all department staff. Policy dictates the total hours in which a student athlete may participate in athletic related activity weekly, designated number of days off during the week, and additional details. Changes may not be made within 24 hours without an exception and extenuating circumstances.

Within each event on the calendar, the active roster and/or participant roster is up to date. Additionally, at the end of the week, a summary of the participation requirements is sent to the student athletes to confirm accuracy. The system does not require every athlete on the team to confirm accuracy of the participation requirement. The ICA office of compliance reviews all submitted participation or CARA logs for each sport.

Change of Status

There is a roster management policy within the department requiring approval for any roster change of status. Official rosters are active and available in the ARMS system in the department**.** Change of status workflows are submitted through ARMS and reviewed by the compliance office and sport supervisor. Unless the workflow is approved, the student athlete will remain on the roster. Information/justification for the change is included in the form.

Following an approved change of roster - remove from squad workflow is completed and the student athlete is sent an online exit survey to complete. In addition to the survey, there is an

option to request an in-person meeting with an ICA administrator. The workflow is not mandatory but is provided to every student that is removed from a program.

Athletic Slot Use

Athletics slots are to be used only for applicants who have a verifiable record of athletic achievement and will play regularly on the team for which they were recruited, barring any unanticipated impediments. Per the annual Athletic Agreement between the Office of Admissions and Intercollegiate Athletics, a slot request must be filled by an athlete capable of competing at the D1 level and cannot be used for team managers. Intercollegiate Athletics usually reserve these slots for applicants that have not been accepted in the regular process.

Admissions Appeal Process

Freshman and Transfer applicants denied admission could appeal the decision following the guidelines outlined within their admission portal and the Appeal website**.** In UCSB, a student must demonstrate new and compelling information or extenuating circumstances for an appeal to be considered. An appeal typically requires the applicant to describe the special circumstance and if applicable, submit any additional documentation. Procedures to appeal are well articulated on the Office of Admissions' website.

The approval decisions are based purely on the average score from the highest to the lowest. Applicants on the waiting list have priority over appeals**.**

SCOPE AND METHODOLOGY

To achieve our objectives, our work included selecting samples and performing procedures to test the operating effectiveness of controls in the following areas:

- Special Talent Admissions
- Admissions by Exception
- Admissions IT systems access
- Student athlete participation
- Documenting the design of controls over the Admissions Appeal process.

Specifically, but not limited to, we:

- Determined how the campus identifies and tracks applicants that departments recommend based on special talent.

- Determined whether required approvals are documented and whether documentation of special talent exists.

- Reviewed documentation and assessed whether the source of the documentation appears legitimate, credible, and supports the special talent.

- Confirmed that rationale for identification of applicants for consideration under admission by exception policy is documented and if the rationale identified for applicants meets criteria defined in UCSB policy or BOARS guidance.

- Confirmed that the individuals who identified candidates for consideration under Admission by Exception did not make final admission decisions.

- Determined whether the campus obtained any required approvals.

- Analyzed the risk of user changes to data and determine whether sufficient controls exist to ensure that those changes are appropriate and properly approved.

- Determined whether the campus periodically reviews the appropriateness of authorized user access and whether their access was appropriately authorized.

- Reviewed job descriptions and determined if the level of authorized user access (such as differences in read and write permissions) is aligned with job responsibilities.

- Determined whether existing controls are sufficient to ensure that records supporting ongoing participation in athletics are kept current throughout the season.

- Assess the reliability of participation documentation by reviewing controls over the information they contain, such as any required approvals.

- Interviewed the Director of Admissions on the Admissions Appeal Process.

These and other procedures addressed the evaluation and testing of controls pertaining to Undergraduate Admissions applications received from Fall 2016 through Spring 2019.

CRITERIA

Our review was based upon standards as set forth in the UC and UCSB policies, best practices, and other guidance relevant to the scope of the audit. We assessed the organization's adherence to these controls as part of this audit. This review was conducted in conformance with the *International Standards for the Professional Practice of Internal Auditing* and emphasized compliance with UC and UCSB procedures.

AUDIT TEAM

Ashley Andersen, Audit Director
Antonio Mañas Melendez, Associate Director
Gifty Mensah, Senior Auditor

APPENDIX

RECOMMENDATIONS AND MANAGEMENT CORRECTIVE ACTIONS

Table 1 **Systemwide Audit of Undergraduate Admissions**
Management Corrective Actions

No	Recommendation	Management Corrective Action	Target Date
A.1	Ensure that any committee charged with making admissions decisions develop a charter that includes, at a minimum, the committee's: • Key objectives or purpose • Authority • Responsibilities • Membership, including term limits and voting privileges • Frequency of meetings • Review criteria • Approval or decision-making process and requirements, including quorum requirements and documentation requirements.	The Committee on Admissions, Enrollment and Relations with Schools (CAERS), which is the Academic Senate Committee at UCSB with oversight of admissions selection criteria, formed a subcommittee called the Athletic Admissions Review Committee (AARC) to review all student athletes. AARC has a charter and guidelines for responsibilities, committee membership, policies, and reporting requirements. These guidelines address the following: • Key objectives or purpose (section I of policy) • Authority • Responsibilities of each member • Membership, including term limits and voting privileges • Frequency of meetings • Review criteria Revisions to these guidelines will be made to clarify the decision-making process of the committee, including quorum requirements and documentation requirements. (Process delayed due to COVD-19 meeting disruptions). Owner: Director of Admissions and Committee on Admissions, Enrollment and Relations with Schools (CAERS)	June 30, 2020
A.2	Evaluate current retention practices for admissions documentation, including approval documentation, and ensure documented procedures reflect appropriate retention requirements in accordance with the UC Records Retention Schedule. Provide training to the appropriate personnel on records retention requirements.	The current practice is to scan and append documents to an applicant's electronic file. The application, test results, transcripts, etc. currently remain part of the permanent record. Documents received from participants in the selection process (Conflict of Interest forms, applicant scoring results, etc.) will be maintained electronically within the Admission's Office for five years from the date the application cycle began (November) in accordance with UC Records Retention Schedule. (*Records Retention Schedule states: Official Record: Retain records for 5 years after the end of the academic year in which the records are processed or for no longer than one year after their administrative use ceases, whichever is longer. All Other Copies: Copies are considered non- records and should be retained only until their usefulness has passed, but never any longer than the official record*)	June 30, 2020

Table 1	Systemwide Audit of Undergraduate Admissions Management Corrective Actions		
No	**Recommendation**	**Management Corrective Action**	**Target Date**
		Technical staff will meet in April to finalize implementation steps for spring 2021 deployment. Final procedures will be documented within the Admissions Guidelines to include staff record retention training requirements, types of documents to retain vs. eliminate. The Office of Admissions will have primary responsibility for ensuring records are properly maintained with additional technical support provided by SIS&T and the Office of the Registrar. A committee of Admissions along with these additional units have started the process of designating responsibilities, establishing an annual timeline, and designing methods for tracking completion each cycle. A training session for summer 2020 has been added to the training schedule for June for all relevant staff. Owner: Director of Admissions	
C.1	Implement controls to ensure that applicants recommended on the basis of special talent are identified and tracked in accordance with the guidance to be provided by Systemwide Undergraduate Admissions as recommended in the Phase 1 Audit	Admissions IT developers have developed new codes to be deployed within UADMS to track students identified as "special talent" (see Admissions Procedures *Annual Review of Admissions Systems*, page 9). All admissions decisions are stored in the campus Data Warehouse and the new codes, along with new queries will allow the Business Analyst to identify applicants based on type of special program. Currently, UCSB tracks all students recommended for "special talent" admission using a combination of the UCOP designated codes, departmental request lists, and evaluation notes amended to the applicant record within UADMS. The Director of Admissions and the Admissions Business Analyst are developing queries that will be run prior to Admission release to review the accuracy of all coding and documentation for each student considered for admission via Special Talent. Those selected for admission vs. denial are clearly designated on the "G-Screen" within UADMS. Additionally, prior to admissions release, the Business Analyst will verify that all applicants recommended have been identified in the system for their respective programs in accordance with the guidance to be provided by systemwide Undergraduate Admissions. Owner: Director of Admissions	June 30, 2020

Table 1 **Systemwide Audit of Undergraduate Admissions**
Management Corrective Actions

No	Recommendation	Management Corrective Action	Target Date
C.2	Evaluate current retention practices for documentation supporting special talent recommendations, and ensure documented procedures reflect appropriate retention requirements in accordance with the UC Records Retention Schedule. Provide training to the appropriate personnel on records retention requirements.	Documentation for individual students considered for admission by Special Talent is appended to their applicant record within Inside Admissions. For students who enroll at UCSB, this documentation will be maintained in accordance with UCOP record retention policy. Records and documents for students who are denied or who elect not to enroll after being offered admissions, will be destroyed according to UC retention policies. Established procedures will be documented in the Admissions Procedure manual and will adhere to UCOP record retention policies. Staff undergo training each year regarding these policies each summer. A training session for summer 2020 has been added to the training schedule for June 23rd at 3:15 for all relevant staff. Owner: Director of Admissions	June 30, 2020
D.3	Implement controls to ensure accurate classification of Admissions by Exception for all students that campus admits and enrolls under the policy, including identifying and tracking of student athletes and those designated as “disadvantaged” or “other.”	New codes have been added to the UADMS system to track in greater detail the categories of Admission by Exception. An “Admission by Exception” form is completed for each student admitted via admission by exception. The form requires three signatures validating the accuracy of the information. The senior admissions representative will attest the data and notes written by the Evaluator aligns with the information stored within UADMS. The form contains the rationale for the decision and the rationale for designating the student for Admission by Exception (i.e. special talent, athletes, academic deficiency, exceptional hardship, those designated as disadvantage, and others identified in the Regents Policy 2105: Policy on Undergraduate Admissions by Exception. This information must match with information provided within the application and/or other supporting documentation provided by the student or recommender. All documentation is appended to the applicant record within Inside Admissions and becomes part of the student’s electronic record until retention policy requires purging of the records. Owner: Director of Admissions	June 30, 2020
E.1	Update admissions IT system user access to ensure that access is appropriately aligned with job responsibilities.	The Business Analyst maintains documentation specifying system access levels for each designated role. Access levels and procedures for requesting access are current and updated annually.	Complete

Table 1	Systemwide Audit of Undergraduate Admissions Management Corrective Actions		
No	**Recommendation**	**Management Corrective Action**	**Target Date**
		The Systems Analyst tracks all users based on assigned roles and verify access annually with supervisors. At the conclusion of each cycle (March of each year), access for temporary reviewers is removed pending certification for the next cycle which begins the following November. Owner: Director of Admissions	
E.2	Document admissions IT system access provisioning processes to ensure that access is only provided to authorized individuals and that access rights are consistent with users' roles and responsibilities. At a minimum, these procedures should require: • Documented justification and authorization for user access to admissions IT systems • Maintenance of a list of authorized users and associated privileges	New "User Request" forms are in use and user access is reviewed annually with supervisors. System access provisioning procedures have been documented in the Admissions Procedure manual (pg. 9, appendix section V) as specified in the recommendation. A list with access along with approval forms signed by supervisors are scanned and stored by the Systems Analyst. Owner: Director of Admissions	Complete
E.3	*Additional Recommendation (Local recommendation)* Evaluate, with the support of the Registrar Office, the possibility of implementing additional audit logs of selected fields to track modifications of student data. Document audits logs in the Admissions systems.	The Director of Admissions with the support of the Registrar Office would evaluate whether additional logs are needed to properly track modifications of student information. The Director of Admissions will request Student Information System & Technology to document audit logs tracking modifications of selected fields in UADM and Inside Admissions. A request went out on 3/19/20 to Admissions and Registrar's programmers to provide the Director of Admissions with a spreadsheet of data fields used in UADMS that currently do NOT identify the user making changes to sensitive data fields that could impact admissions. Based on the findings, programmers will make necessary coding changes no later than fall 2021 application cycle Owner: Director of Admissions	June 30, 2020

Table 1	Systemwide Audit of Undergraduate Admissions Management Corrective Actions		
No	**Recommendation**	**Management Corrective Action**	**Target Date**
F.1	Implement controls, such as required forms, to ensure that reasons for changes in athletics program participation status are clearly documented.	The ARMS program has been implemented to ensure rosters are up to date with active participants at all times. Any student athlete change in status requires approval through the ARMS system including multiple signatures. If there is a change in status in the first year of matriculation at UCSB it requires, in addition to the online coordination and approval, an in person meeting with staff in the office of compliance. All students regardless of reason for changing status are also provided an exit survey. Currently, the ICA is in the process of working with ARMS on the actual form and workflow that is utilized to approve, monitor and track change of status. In the update, there will be additional information required for all change of status (not just first year of matriculation) to include detailed reasons and justification for the removal from the team / program. All documentation related to the change of status is archived in the ARMS workflow system as well as in the profile page for the student athlete/ former student athlete. As part of the documentation and archiving process, reasons for, justification and other comments are included in the workflow before approval. This is all archived as mentioned above. Owner: Director of Intercollegiate Athletics	June 30, 2020
F.2	*Additional Recommendation (Local recommendation)* Implement controls to ensure that practice logs are tracked and verified for each individual athlete. Evaluate the possibility of requiring all athletes on a team to confirm accuracy of the weekly Countable Athletic Related Activity (CARA).	Intercollegiate athletics implemented controls to monitor total possible athletic participation (CARA, Countable Athletically Related Activity) for all student athletes as required by the NCAA. The process is done via the ARMS software program. Weekly CARA logs are sent to every student athlete and coach for verification and approval is confirmed through the department of compliance. Owner: Director of Intercollegiate Athletics	June 30, 2020
G.1	Develop or amend local policies and procedures to address requirements for all appeals decisions. The policies and procedures should include the following*:*	During the fall 2020 application cycle, Admissions implemented an online appeal portal (prior to fall 2020, appeals were received by mail). The Appeal Portal will open one week following Admission decision release and will be closed to all appeals on April 15 (freshmen) and June 15 (transfers).	June 30, 2020

Table 1	Systemwide Audit of Undergraduate Admissions Management Corrective Actions		
No	**Recommendation**	**Management Corrective Action**	**Target Date**
	• *A requirement that* all appeal reviews be fully documented, including analyses, recommendations, decisions, and individuals involved. • A requirement that at least two individuals or a committee be involved in appeals reviews, and if final decisions are contrary to initial recommendations, the rationale for final decisions must be documented.	Per instructions to the student (see http://admissions.sa.ucsb.edu/appeal), all appeals must contain a cover letter, transcripts, and up to two additional documents (letters or recommendation or other document). All appeal reviews will be fully documented in the system to include the scoring, rationale, decisions, and reviewers. All appeals require two senior admissions staff (Director or Associate Director level) to score each appeal using a 1-5 scale (1 being the highest score). The two scores will be averaged and based on available space after waitlisted students are accommodated, appeals will be selected based on rank order. The rationale for each appeal decision will be noted in the UADMS system which stores all decision information. The UADMS system provides an audit trail to indicate who reviewed and scored each appeal. All appeal types will be documented in the Admission Procedure Manual as specified in the recommendation. Owner: Director of Admissions	

Source: Responses from Office of Admissions, and Intercollegiate Athletics