

Systemwide Audit of Undergraduate Admissions-Management Corrective Actions – UCD

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 applications evaluations that consider qualitative factors, a requirement that at least two independent documented evaluations support a decision to admit 	<p>(a) The Academic Senate’s Committee on Admissions and Enrollment will review existing documentation and finalize local policies governing the admissions review processes. The committee will ensure that these policies:</p> <ul style="list-style-type: none"> • Define evaluation criteria. • Require documentation of how evaluation criteria were applied. Decisions resulting from different phases in the admissions review process may best be supported by varying forms of documentation. • Require documentation of at least two independent evaluations to support a decision that is based on qualitative factors. In cases of initial selection, a predicted value may suffice as one of the evaluations. This documentation will indicate the specific individuals or committees involved in the evaluation and final decision. • Establish requirements for documentation of verification of special talent, and require any special talent programs to submit this documentation along with recommendations for admission. 	5/1/2020
	<p>(b) In consultation with the Academic Senate’s Committee on Admissions and Enrollment, Undergraduate Admissions will develop procedure documentation that articulates, and where applicable provides justification for, all components of the admissions review processes.</p>	5/1/2020

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	(c) Intercollegiate Athletics (ICA) will revise its existing policy and procedures document, “UC Davis ICA Policies and Procedures” in consultation with the Academic Senate’s Committee on Admissions and Enrollment and any other stakeholders as identified by ICA. Revisions will include: <ul style="list-style-type: none"> • Bifurcation of existing policy into two separate documents that address i) policies and ii) procedures. • Incorporation of changes recommended in this report. 	5/1/2020
	(d) ICA will submit a revised policy and procedures to the Committee on Admissions and Enrollment.	5/1/2020
	(e) The Committee on Admissions and Enrollment will review and offer comments on any admissions-related policy developed by ICA.	5/1/2020
1.2 Document all admissions decisions with sufficient detail to: <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 	(a) Undergraduate Admissions will develop a mechanism for documentation required by the Committee on Admissions and Enrollment’s policy.	5/1/2020
[Recommendations 2.1-3 and 3.1 are addressed to UC Systemwide Undergraduate Admissions. They do not apply to local campuses.]		

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<p>3.2 Clearly identify and track all applicants that departments recommend on the basis of special talent.</p>	<p>There are two parallel processes for special talent admissions. Recommendations made by Intercollegiate Athletics (ICA) are overseen by the Athletics Compliance function; recommendations made by the Music department or Reserve Officers' Training Corps (ROTC) are received directly by Undergraduate Admissions.¹ As such, two processes will be defined, and both will receive approval from the Committee on Admissions and Enrollment.</p> <p>(a) Undergraduate Admissions will develop an online tool to identify and track all applicants that are recommended by the Department of Music or ROTC.</p>	<p>5/1/2020</p>
	<p>No action necessary.</p> <p>All applicants that are recommended on the basis of athletic talent are clearly identified and tracked on a spreadsheet administered by ICA. ICA Compliance Services stores this list on a protected server. This list is updated whenever a coach requests to add or remove a prospective student athlete from consideration.</p>	<p>AMAS has verified.</p>
<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</p>	<p>(a) Undergraduate Admissions will incorporate a functionality into an online tool for documenting verification of special talent in accordance with minimum documentation requirements set by the Committee on Admissions and Enrollment.</p>	<p>5/1/2020</p>

¹ While Undergraduate Admissions constantly receives informal recommendations from a range of individuals, recommendations from Intercollegiate Athletics, the Music department, and ROTC are the only categories entitled to the “Special Talent Admissions” consideration described in this section of the report.

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<p>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>	<p>(b) ICA will establish and document minimum requirements for documented verification of athletic talent for all non-scholarship prospective student athletes. These requirements will be based on objective, verifiable criteria.</p> <p>In order to accomplish this, ICA will likely develop different criteria for different sports.</p> <p>ICA will apply this requirement only to students who were admitted on the basis of a recommendation; it will exclude students who were admitted during initial selection.</p>	<p>5/1/2020</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>	<p>(a) Undergraduate Admissions will incorporate a functionality into an online tool for documenting that verification of special talent has been confirmed by both the initiator of the recommendation and an individual in a supervisory capacity. Specifically, the initiator must document and attest, under penalty of disciplinary action, 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>	<p>5/1/2020</p>
	<p>(b) For purposes of verifying the special talent of student athletes, the Undergraduate Admissions Executive Director must annually attest that initial selection occurred autonomously and that decisions made during initial selection were made independent of recommendations from ICA.</p>	<p>5/1/2020</p>
	<p>(c) Undergraduate Admissions (UA) will annually document the date on which it completed initial selection and the date on which ICA provided UA with its list of recommended applicants.</p>	<p>5/1/2020</p>

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	<p>(d) To ensure that ICA does not send its list of recommended applicants to Undergraduate Admissions (UA), and that UA does not receive it until after UA completes its initial selection process:</p> <p>UA will document in its policy a requirement of not accepting ICA’s list of recommended applicants until after UA completes the initial selection process.</p>	5/1/2020
	<p>(e) To ensure that ICA does not send its list of recommended applicants to Undergraduate Admissions (UA), and that UA does not receive it until after UA completes its initial selection process:</p> <p>ICA will document in its policy a requirement of not sending its list of recommended applicants to UA until after UA has completed the initial selection process.</p>	5/1/2020
	<p>(f) ICA will require head coaches to document and attest, under penalty of disciplinary action, that they have performed an assessment and determined that the level of special talent warrants a recommendation for admission for non-scholarship prospective student athletes. The attestation will be documented in ICA’s ARMS system.</p> <p>ICA will apply this requirement only to students who were admitted on the basis of a recommendation; it will exclude students who were admitted during initial selection.</p>	5/1/2020

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	<p>(g) ICA will require sports administrators to approve recommendations for admission for non-scholarship prospective student athletes. This approval will be documented in ICA’s ARMS system.</p> <p>ICA will apply this requirement only to students who were admitted on the basis of a recommendation; it will exclude students who were admitted during initial selection.</p>	5/1/2020
<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>	<p>(a) ICA will require the Associate Athletics Director of Compliance Services to verify the athletic qualifications of all non-scholarship prospective student athletes who are recommended for admission by athletics. Documentation will be kept in ICA’s ARMS system. Athletic qualifications are to be verified using minimum requirements for documented verification.</p> <p>ICA will apply this requirement only to students who were admitted on the basis of a recommendation; it will exclude students who were admitted during initial selection.</p>	5/1/2020
<p>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.</p>	<p>(a) Undergraduate Admissions will incorporate a functionality into an online tool for documenting that all admissions decisions for applicants recommended by departments on the basis of special talent are approved by the Executive Director of Admissions or a designated member of senior leadership.</p>	5/1/2020
<p>[Recommendation 4.1 is addressed to UC Systemwide Undergraduate Admissions. It does not apply to local campuses.]</p>		

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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.	(a) The Committee on Admissions and Enrollment will review existing guidance and issue a local policy on Admissions by Exception. Among other elements deemed necessary, this policy will require that the duties of identification of candidates and approval of Admissions by Exception be separated.	5/1/2020
4.3 Establish controls to ensure that an acceptable rationale for identifying an applicant to be considered for admission by exception is documented for each applicant being considered under the policy.	(a) Undergraduate Admissions will develop a field within the Inside Admissions system that will be used to track the rationale for identification of candidates for Admission by Exception.	5/1/2020
4.4 Establish local procedures to annually monitor compliance with the campus percentage limits for admissions by exception established by Regental policy.	(a) Undergraduate Admissions will establish, document, and implement procedures for comprehensive reporting to the Committee on Admissions and Enrollment on the outcomes of the admissions process, including detailed reporting on Admissions by Exception.	5/1/2020

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<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:</p> <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 reviewing applications associated with these potential conflicts. <p>Attest that they are not aware of any attempt to improperly influence an admissions decision.</p>	<p>(a) The Committee on Admissions and Enrollment will develop a policy on conflict of interest that expands upon existing guidelines. The policy will cover all individuals involved in reviewing applications or making admissions decisions, and will require attestations regarding awareness of improper influence and disclosures of known acquaintances. The policy will also describe disciplinary action for failures to disclose or recuse.</p>	<p>5/1/2020</p>
<p>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.</p>	<p>(a) Undergraduate Admissions will review and expand existing training in the areas of improper influence, bias, and conflict of interest. All individuals involved in the admissions review process, including external readers, will continue to receive this training.</p>	<p>5/1/2020</p>

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<p>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.</p>	<p>(a) Undergraduate Admissions will obtain criteria from the Committee on Admissions and Enrollment to guide readers’ disclosure of potential conflicts of interest. At a minimum, defined conflicts will include affiliations with high schools or community colleges. Undergraduate Admissions will use these criteria in implementing a technical control to ensure that applications are not assigned to readers when that assignment would result in a potential conflict.</p>	<p>5/1/2020</p>
<p>5.4 Establish controls preventing individuals who perform outreach from reviewing applications from individuals with whom they have had more than routine contact.</p>	<p>The Committee on Admissions and Enrollment and Undergraduate Admissions will work together to provide controls for preventing conflict of interest in readers who oversee academic preparation or other outreach programs as described in the following MCA:</p> <p>(a) The Committee on Admissions and Enrollment will develop a policy regarding appropriate reader assignments for staff who oversee academic preparation or other outreach programs.</p>	<p>5/1/2020</p>
<p>6.1 Implement controls to periodically review admissions IT system access to ensure that the level of access is aligned with job responsibilities including, at a minimum, a review of user access before each annual admissions cycle begins.</p>	<p>(a) Undergraduate Admissions will document and implement a process for periodic review and revision of users’ levels of privilege within the Inside Admissions system. The privilege to make changes to admissions decisions will be restricted to the minimum necessary number of staff in senior leadership roles.</p>	<p>5/1/2020</p>
<p>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.</p>	<p>(a) In consultation with the Committee on Admissions and Enrollment, Undergraduate Admissions will develop and implement a procedure document that defines (i) activities within the Inside Admissions system that constitute “high-risk changes” and (ii) a process for reviewing them.</p>	<p>5/1/2020</p>

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<p>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.</p>	<p>N/A</p>	<p>N/A</p>
<p>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.</p>	<p>(a) ICA will establish a policy addressing conflict of interest requirements for athletics personnel, including a requirement that all athletics personnel 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 how it should be addressed with a management plan. This policy will apply to all student athletes, regardless of scholarship status.</p> <p>The definition of “existing relationship” may be adopted from similar language used by the NCAA.</p> <p>The disclosure will be documented by an annual attestation signed by all staff. Attestations will be retained and reviewed annually by the Associate Athletics Director of Compliance Services and Director of ICA.</p>	<p>5/1/2020</p>

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<p>8.2 Perform an analysis to identify categories of third parties who contact the athletics department regarding prospective student athletes that are unusual or at a higher risk of inappropriately influencing admissions decisions, such as donors, admissions consultants, and athletic recruiting/scouting services not approved by the NCAA. Establish a requirement for all athletics personnel to document all contact from these categories in a central repository. Athletics compliance should at least annually review this list and investigate any questionable contact.</p>	<p>(a) In consultation with the Committee on Admissions and Enrollment, ICA will perform an analysis to identify categories of third parties who contact the athletics department regarding prospective student athletes that are unusual or at higher risk of inappropriately influencing admissions decisions.</p> <p>ICA has preliminarily identified the following as categories of third parties at unusual or higher risk of inappropriately influencing admissions decisions:</p> <ol style="list-style-type: none"> 1) Those who contact ICA staff with offers of personal financial compensation, gifts to the university, or quid pro quo for recommending a student for admission to UC Davis. 2) Those who contact ICA staff and make a request for admission of a student-athlete who is known to the ICA staff member to have athletic ability that would be insufficient to compete at UC Davis. <p>The Associate Athletics Director of Compliance Services will then record the contact in a central repository or establish a requirement for staff to record the contact in a central repository.</p>	<p>5/1/2020</p>
	<p>(b) ICA Compliance Services will develop a process to annually review the list of contacts from third parties that have been identified as unusual or at higher risk of inappropriately influencing admissions decisions, and investigate any questionable contact. Results of the investigation will be shared with the campus Chief Compliance Officer.</p>	

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<p>8.3 Provide regular training to athletics personnel on the conflict of interest requirements discussed in recommendations 8.1 and 8.2.</p>	<p>(a) ICA will develop training for athletics personnel on the new conflict of interest requirements. This training will occur annually at the “all staff meeting”. The process will require all staff to sign an attestation confirming that training has been completed.</p>	<p>5/1/2020</p>
<p>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:</p> <ul style="list-style-type: none"> • Any exceptions to this requirement. • Approval requirements for any exceptions to the policy. • Consequences for violating the policy. 	<p>(a) ICA will establish a minimum one year participation requirement for all non-scholarship student athletes who are recommended for admission and participation in an athletics program or as part of an official UC Davis sports team. ICA will apply this requirement only to students who are to be admitted on the basis of a recommendation; it will exclude students who were admitted during initial selection. This requirement must be documented in policy.</p> <p>This requirement will include exceptions and approval requirements for any exceptions. The requirement will also include consequences for violating the policy.</p>	<p>5/1/2020</p>
<p>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.</p>	<p>(a) ICA will require non-scholarship athletes recommended for admission to sign an agreement that they will comply with the minimum one year participation requirement, subject to consequences established in the policy. ICA will also develop a process to collect these signed agreements.</p> <p>ICA will not forward any recommendation for consideration to Undergraduate Admissions that is not accompanied by a signed agreement. ICA and Undergraduate Admissions will collaborate with Campus Counsel to draft the agreement such that the language clearly describes exceptions to the requirement, and will protect against any Title IX issues that may arise as a result.</p>	<p>5/1/2020</p>

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<p>9.3 Establish controls to ensure records supporting ongoing participation in athletics are kept current throughout the season.</p>	<p>No action necessary.</p> <p>ICA currently has controls to ensure that records supporting ongoing participation are kept current throughout the season. Coaches and non-coaching staff who oversee specific sports are charged with satisfying NCAA requirements to regularly log all countable athletic related activities (CARA). These records are updated daily, weekly, or monthly. Compliance Services performs a monthly review of these logs. Compliance Services also reviews participation history at the end of each season, specifically reviewing for participation in competitions.</p>	<p>AMAS has verified.</p>
<p>9.4 Establish controls to independently monitor compliance with the one-year minimum participation requirement for non-scholarship student athletes recommended for admission.</p>	<p>(a) ICA currently reviews participation logs monthly. ICA will expand the review process to include an independent monitoring of recruited student athletes' compliance with the one-year minimum participation requirement.</p>	<p>5/1/2020</p>
<p>9.5 Provide regular training to athletics staff on the minimum participation policy requirements.</p>	<p>(a) ICA will develop training on the minimum participation policy requirement. This training will occur annually at the "all staff meeting". The process will require all staff to sign an attestation confirming that training has been completed.</p>	<p>5/1/2020</p>
<p>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.</p>	<p>(a) ICA will restructure the reporting relationship of the Associate Athletics Director of Compliance Services to add a direct reporting line to the campus Chief Compliance Officer.</p>	<p>5/1/2020</p>

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<p>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.</p>	<p>(a) The Committee on Admissions and Enrollment will develop a policy for limiting communications between Undergraduate Admissions and development personnel. At a minimum, any communication regarding the admission status of specific applicants will be prohibited.</p>	<p>5/1/2020</p>
<p>11.2 Perform a review prior to admission for each non-scholarship recruited athlete to identify any donations from any known relatives of the recruited athlete, or anyone that the athletics department knows to be acting on behalf of the family. A member of senior leadership independent of the athletics department or an existing athletics admissions oversight committee should oversee this review process, including determination of any due diligence required when donations are identified, and approval of any admissions decisions for which donations were identified.</p>	<p>(a) Annually, ICA will 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.</p> <p>In consultation with the Committee on Admissions and Enrollment, ICA Compliance Services will design a process to perform the review described above. This process, which may include a cut-off date or a minimum threshold for donations subject to review, must be supported with documented rationale.</p> <p>The member of senior leadership independent of the athletics department that will oversee the review process is the ICA Associate Athletics Director of Compliance Services; this individual will report on the scope and results of the review to the campus Chief Compliance Office.</p>	<p>5/1/2020</p>