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November 13, 2019

# VICE PROVOST ENROLLMENT MANAGEMENT YOULONDA COPELAND-MORGAN DIRECTOR OF ATHLETICS DANIEL GUERRERO:

## Re: Systemwide Audit of Undergraduate Admissions Audit #19-714007

Phase I of the Undergraduate Admissions Audit, as part of a University of California systemwide audit, has been completed. The Systemwide Audit of Undergraduate Admissions report was issued by the University of California Office of the President on June 22, 2019. The audit report contained observations applicable to all UC campuses. The management action plans prepared by the University of California, Los Angeles in response to the systemwide audit, are enclosed.

The review was conducted in conformance with the International Standards for the Professional Practice of Internal Auditing.

We wish to extend our appreciation to all personnel with whom we had contact while conducting our review. If you have any questions or require additional assistance, please do not hesitate to contact me at (310) 983-3730.

Edwin D. Pierce, CPA, CFE Director

Enclosure

- cc: A. Bustamante
  - G. Clark
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## SYSTEMWIDE AUDIT OF UNDERGRADUATE ADMISSIONS AUDIT REPORT #19-714007

Audit & Advisory Services November 2019

## SYSTEMWIDE AUDIT OF UNDERGRADUATE ADMISSIONS AUDIT REPORT #19-714007

### **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 (UA). This audit was performed in coordination with the internal audit department's at all undergraduate UC campuses using a common systemwide audit program to assess the design of internal controls over the admissions process and related procedures. In fiscal year 2019-2020, ECAS will oversee a second audit of admissions to assess the operating effectiveness of controls identified in this review.

#### Purpose and Scope

The purpose 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. The scope of this 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 designation, 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.

Recommendations and the University of California, Los Angeles' (UCLA) Management Corrective Actions (MCA) are detailed in the following section.

Recommendation	Management Corrective Action	Target Date
<ul> <li>1.1 Document any local policies and develop detailed procedures for all aspects of the application evaluation and admissions process, to include the following:</li> <li>Criteria used to evaluate applications, including any qualitative factors considered, consistent with comprehensive review.</li> <li>Minimum documentation requirements to demonstrate application of criteria in the evaluation results.</li> <li>For freshman application evaluations that consider qualitative factors, a requirement that, at least two independent documented evaluations support any decision to admit.</li> </ul>	<ul> <li>UCLA currently has detailed documented policies and procedures for all aspects of the application evaluation and admissions process. These policies were established and approved by UCLA's Committee on Undergraduate Admissions and Relations with Schools (CUARS). They are currently documented in Undergraduate Admission's (UA) reader training materials. These include:         <ul> <li>UCLA Admission Criteria</li> <li>Background</li> <li>Guiding Principles</li> <li>Selection Criteria</li> <li>Review &amp; Selection Overview</li> <li>Application Review</li> <li>Assessing an Application</li> <li>Application Handling</li> <li>Scoring Guidelines</li> <li>Stupplemental Review Guidelines</li> <li>Training Presentations</li> <li>These included in the documentation.</li> </ul> </li> <li>Reading materials are provided annually to all new and returning readers.</li> <li>Every freshman application receives at least two blind, independent reviews by two different readers before a final admission decision is made.</li> <li>There are numerous quality control measures in place. For example, if the two readers are disparate (more than one holistic rank apart), the application receives a third review. These reviews are conducted by a Senior Admission team member.</li> <li>Final admission selection of applicants are made by the Director.</li> </ul>	Current Practice

Recommendation	Management Corrective Action	Target Date
<ul> <li>1.2 Document all admissions decisions with sufficient detail to:</li> <li>Meet the minimum documentation requirements specified in the policies and procedures described in recommendation 1.1.</li> <li>Indicate the specific individuals and/or committees that were involved in the evaluation of the application and the final decision.</li> </ul>	<ul> <li>The systems keep track of who reads the application, but readers do not make final decisions. The UA Director and Senior Admission team members discuss cases before admission decisions are finalized. Senior Admission team members include the Director, Senior Associates, Associates, and Senior Assistant Directors.</li> <li>All ratings are attributed in the admission application review system.</li> <li>Final admission decisions are made following a discussion of cases by senior admission team members, including the Director, Deputy Director, Senior Associates, Associates, Associates, and Senior Assistant Director, Deputy Director, Senior Associates, Associates, Associates, and Senior Assistant Director, Deputy Director, Senior Associates, Associates, and Senior Assistant Director, Deputy Director, Senior Associates, Associates, and Senior Assistant Directors.</li> <li>There is at least one name recorded per admission decision.</li> </ul>	Current Practice
3.2 Clearly identify and track all applicants that departments recommend on the basis of special talent.	<ul> <li>Undergraduate Admission will create detailed documentation that describes the process for recommendation and approval of students for admission to one of our five schools that require faculty recommendations based on talent, and also athletics.</li> <li>Candidates for admission to an undergraduate program at UCLA are admitted to one of six schools: School of Nursing, UCLA School of Theater, Film and Television, Henry Samueli School of Engineering, UCLA Herb Alpert School of Music, School of the Arts and Architecture, and The College of Letters and Science. Each professional school has an admission committee (faculty/staff) who reviews admission candidates and makes recommendations for admission to UA.</li> <li>Before any admission decision notification, professional school staff review and confirm tentative admission decisions related to special talent. Undergraduate Admission finalizes all decisions which are tracked in our admission systems. This tracking will begin at the time that Athletics or the school provides recommendations to UA.</li> </ul>	December 2019

Recommendation	Management Corrective Action	Target Date
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.	<ul> <li>UA Response         UCLA will document current procedures and practices regarding assessment of special talent by schools/faculty and Athletics, which will include the types of information and trusted sources that can be used to confirm qualifications or credentials for a specific sport or talent. Any necessary policy additions will be made by CUARS, and any practices/procedures will be made by UA and Athletics/schools/faculty.     </li> <li>With regards to other students admitted based upon special talents, we will ask each school to establish and document the minimum requirements for documented verification of special talent for each department. Undergraduate Admission will review submitted guidelines to ensure that recommended procedures meet these audit recommendations. All documentation will become a part of UA's approved procedures.     </li> <li>Athletics Response         Athletics, including the internal Compliance staff, will be responsible for establishing a sport-specific set of criteria to verify the athletic qualifications of prospective student athletes. The documented criteria will include trusted sources, such as recruiting services and scouting tools that provide data about prospective student athletes, and types of information. Athletics will require team staff to complete a more comprehensive Priority Coding Request Form for every prospective student athlete admission. The athletic qualifications that meet the criteria established for the team will be articulated on this form. Before final submission, the Head Coach must attest that all of the information on the form is accurate, under penalty of disciplinary action.     </li> </ul>	December 2019

Recommendation	Management Corrective Action	Target Date
<ul> <li>3.4 Require a two-step verification process for any recommendation for admission on the basis of special talent that includes the following:</li> <li>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.</li> <li>An individual in a supervisory capacity must approve the recommendation.</li> <li>For athletics, this process could be limited to non-scholarship prospective student athletes.</li> </ul>	<ul> <li>UA Response         UA and CUARS will discuss this requirement, with CUARS to determine necessary policy. UA will then partner with schools/faculty and Athletics to develop procedures that adhere to these policies.     </li> <li>Athletics Response         The initiator and Head Coach will document and attest, under penalty of disciplinary action, on the Priority Coding Request Form, that they have assessed the athletic qualifications for every prospective student athlete recommended for admission and that each of those prospective student athletes warrants special admission. The Head Coach's supervisor will be responsible for independently confirming that all prospective student athletes' athletic qualifications stated on the Priority Coding Request Forms are sufficient to meet or surpass the criteria that will be established for that team.     </li> </ul>	December 2019
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.	<ul> <li>UA Response         Following the action listed in 3.3 and subsequent recommendations from CUARS, UA will partner with Athletics to further document and develop these procedures for all recruited student athletes, both scholarship, and non-scholarship.     </li> <li>Athletics Response         Upon receiving the approval of the Head Coach's supervisor, the Athletics Compliance staff will conduct another review of the prospective student athlete's athletic qualifications to confirm that the prospect is qualified for admission review based on their special talent as an athlete. This review will be conducted for every prospective student athlete presented for admission, including scholarship student athletes.     </li> </ul>	December 2019

Recommendation	Management Corrective Action	Target Date
3.6 Require all admissions decisions for applicants recommended by departments on the basis of special talent to be approved by the Admissions Director or a member of senior leadership external to the recommending department.	<ul> <li>This practice of requiring 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 is already in place, but UA and schools will document more thoroughly.</li> </ul>	December 2019
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> <li>CUARS will work with UA to develop a clear policy that outlines the acceptable rationale and the required evaluation process for admission by exception (AbyE). This policy will ensure that an individual who identifies a candidate for admission by exception cannot make the final admission decision.</li> <li>UA will ensure that procedures are either in place or developed, to follow that CUARS policy.</li> <li>Note: Procedures currently exist for approval of admission by exception candidates.</li> </ul>	December 2019
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> <li>UCLA follows the UC criteria for AbyE designations. The AbyE designation is tracked through a drop down coding in UCLA systems, which includes the rational given for admitting the student under admission by exception.</li> </ul>	December 2019
4.4 Establish local procedures to annually monitor compliance with the campus percentage limits for admissions by exception established by Regental policy.	<ul> <li>While UCLA has not approached the systemwide limits on AbyE admission, this total/percentage is monitored annually by UA staff and reported to CUARS.</li> <li>UA will document its current procedure to monitor compliance with the systemwide limits on candidates admitted by exception.</li> </ul>	December 2019

Recommendation	Management Corrective Action	Target Date
<ul> <li>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:</li> <li>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.</li> <li>Attest that they are not aware of any attempt to improperly influence an admissions decision.</li> </ul>	<ul> <li>This practice is already in place for external readers at UCLA and is documented in reader training materials and online. Individuals are not able to begin reading applications until this is complete.</li> <li>Readers will sign a retrospective annual agreement and must disclose/update professional associations or personal relationships with possible applicants to UCLA. The reader agreement will be revised to specifically include that they are not aware of any attempt to improperly influence an admissions decision and a requirement that readers are obligated to report any attempts to improperly influence an admissions decision.</li> <li>All reading assignments are assigned to exclude any school(s) where preexisting relationships exist.</li> <li>UA staff and external readers are trained and asked to disclose potential conflicts of interest, but UA will implement an annual documented declaration for all new and returning staff.</li> </ul>	December 2019
5.2 Provide regular training to all individuals who are involved in reviewing admissions applications or making admissions decisions, including external readers, regarding conflicts of interest and associated requirements. This training should include, but not be limited to, the definition of improper influence and provide examples of improper influence in the context of admissions.	<ul> <li>This practice is already in place at UCLA and is documented in reader training materials and online. Individuals are not able to begin reading applications until this is complete. Training content and attendance/completion of training is documented.</li> <li>UA staff are trained and asked to disclose conflicts, but an additional conflict of interest training will be developed and required of all application readers. This training will include, but not be limited to, the definition of improper influence and provide examples of improper influence in the context of admissions.</li> </ul>	December 2019

Recommendation	Management Corrective Action	Target Date
5.3 Establish controls requiring external readers to disclose any current affiliations with high schools or community colleges and preventing those who have such affiliations from being assigned an application of a student from that high school or community college for review.	<ul> <li>UA requires external readers to confirm current or former affiliations with high schools or community colleges annually.</li> <li>No external reader is assigned an application to review until they have annually completed the confirmation form in the reader system. These completed forms are kept on file for all readers.</li> <li>No external reader is assigned an application of a student from any school they listed as an affiliation.</li> <li>While already a practice, UA will document these as requirements for our external readers.</li> </ul>	December 2019
5.4 Establish controls preventing individuals who perform outreach from reviewing applications from individuals with whom they have had more than routine contact.	<ul> <li>Undergraduate Admission will document procedures regarding the assignment of applications to readers to prevent review of individuals with whom they have had more than regular contact.</li> <li>Staff at UCLA do not read "by territory," meaning that staff is not assigned applications to review based on where they visit schools (although this is common practice at most colleges/universities). The nature of our work in UA, however, encourages staff to interact and develop relationships with prospective students/applicants.</li> <li>Cases are randomly assigned to limit the familiarity beyond that which would result from typical outreach interactions. This is made more secure when combined with a blind second review, and numerous quality control checks.</li> <li>Readers are instructed to indicate, "cannot rate" if they are assigned an application of someone they know (neighbor, family friend, relative, etc.).</li> </ul>	December 2019
6.1 Implement controls to periodically review admissions (information Technology) 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.	<ul> <li>The practice of annually reviewing admissions IT system access, to ensure that the level of access is aligned with job responsibilities is already in place, but UA will further document in response to the audit request.</li> </ul>	December 2019

Recommendation	Management Corrective Action	Target Date
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> <li>If a professional school faculty/staff member attempts to change a recommendation/trending admission decision, it is flagged in the admission system and reviewed by a senior UA staff member.</li> <li>If an admission staff member attempts to change a recommendation/pending admission decision, it is flagged in the admission system and reviewed by a senior UA staff member.</li> <li>Undergraduate Admission will implement controls to log activity in admissions IT systems and periodically review high-risk changes, such as admissions decision changes, for appropriateness. UCLA will document its practices with regard to high-risk changes, including the definition of high-risk changes.</li> </ul>	December 2019
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> <li>UCLA does not currently have a specific limit on the number of recruited athletes allowed each year. However, this number has not exceeded 200. Athletics has processes to determine the number of recruits each year, with consideration given to the number of students graduating, National Collegiate Athletic Association (NCAA) guidelines, and roster size each year.</li> </ul>	Not applicable

Recommendation	Management Corrective Action	Target Date
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.	A conflict of interest policy involving relationships between Athletics personnel and scholarship or non-scholarship prospective student athletes and their families will be approved by CUARS. Once established, UA and Athletics will develop procedures to ensure practice adheres to this policy.	December 2019

Recommendation	Management Corrective Action	Target Date
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.	<ul> <li>UA Response         UA will partner with Athletics to document and develop these procedures.     </li> <li>Athletics Response         Athletics administration will develop a list of third-party categories (i.e., donors, recruiting services, scouting services, alumni, educational consultants, etc.) that could potentially attempt to inappropriately influence admissions decisions.     </li> <li>Athletics team staff, who are the only individuals that are authorized to complete a Priority Coding Request Form, will be required to list any instances of contact by individuals from the third-party categories via the Priority Coding Request Form for a prospective student athlete. Priority Coding Request Forms are stored and maintained in a central repository on JumpForward. The Athletics Compliance staff will also maintain a shared list of all third parties reported on these forms in a central repository.     Athletics Compliance staff will be responsible for vetting every reported contact with third parties before presenting prospective student athlete cases to the Student Athlete Admissions Committee. Athletics Compliance will also review the shared list of third parties on an annual basis to identify higher risks of inappropriate influencers on admission decisions.     </li> </ul>	June 2020
8.3 Provide regular training to Athletics personnel on the conflict of interest requirements discussed in recommendations 8.1 and 8.2.	<ul> <li>UA Response UA and Athletics will partner to develop and implement this training.</li> <li>Athletics Response The conflict of interest requirements policy will be reviewed at the annual Athletics Fall Quarter All-Staff Meeting, which is mandatory for all Athletic department staff and coaches.</li> <li>Additionally, annual training in the fall will be provided to Athletics Compliance, Alumni Affairs, and Development staff regarding the conflict of interest requirements.</li> </ul>	December 2019

Recommendation	Management Corrective Action	Target Date
<ul> <li>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:</li> <li>Any exceptions to this requirement.</li> <li>Approval requirements for any exceptions to the policy.</li> <li>Consequences for violating the policy.d</li> </ul>	<ul> <li>UA Response This policy will be approved by CUARS. The current practice is already in place at UCLA.</li> <li>Athletics Response UCLA will revise its current minimum participation requirement of one year for all scholarship and non-scholarship student athletes to require a minimum of two years for freshmen or freshman-level transfers or one year for all other transfers. Participation requirements will be included in the UCLA Freshman and Transfer Admission Contracts issued by the University.</li> <li>UA and Athletics will develop policies and procedures regarding removal, categories of exceptions, and approval requirements for exceptions to minimum participation requirements. These policies will be approved by CUARS.</li> <li>Violation of this requirement may result in the student athlete's admission being revoked.</li> </ul>	June 2020
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> <li>Athletics Response         UCLA will continue to require all non-scholarship prospective student athletes to sign the Athletics department's Statement of Expectations, which includes the minimum participation requirement and consequences for lack of minimum participation. A parent or legal guardian is required to sign this statement as well. The prospect's admission will not be processed unless this statement is signed and returned.     </li> <li>UCLA will extend this requirement to scholarship student athletes by adding the minimum participation requirement to all grant-in-aid scholarship contracts effective for the 2020-21 entering class.     </li> </ul>	October 2019
9.3 Establish controls to ensure records supporting ongoing participation in athletics are kept current throughout the season.	- <b>UA Response</b> UA and Athletics will develop policies and procedures to monitor ongoing participation in athletics by scholarship and non-scholarship student athletes and maintain current records.	June 2020

Recommendation	Management Corrective Action	Target Date
9.4 Establish controls to independently monitor compliance with the one-year minimum participation requirement for non-scholarship student athletes recommended for admission.	<ul> <li>UA Response         UA and Athletics will develop policies and procedures to monitor compliance with the minimum participation requirement in athletics by scholarship and non-scholarship student athletes. Monitoring will be conducted by Athletics non-coaching staff members including but not limited to Senior Athletic Administrators, and verified by the Athletics Compliance staff.     </li> </ul>	June 2020
9.5 Provide regular training to Athletics staff on the minimum participation policy requirements.	<ul> <li>Athletics Response         The minimum participation policy requirement will be reviewed at the annual Athletics Fall Quarter All-Staff Meeting, which is mandatory for all athletic department staff and coaches. Training materials and attendance sheets will be maintained in a central shared file.     </li> <li>This policy requirement will also be discussed with new coaches during their training sessions on the student athlete admission process; training will be facilitated by Athletics Compliance staff and Senior Athletic Administrators responsible for overseeing the recruitment and admission process for prospective student athletes.     </li> <li>In addition, annual training in the Fall will be provided to Sports Medicine and Athletic Performance staffs regarding the minimum participation requirement.</li> </ul>	September 2019

Recommendation	Management Corrective Action	Target Date
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.	- <b>UA Response</b> This proposal will be discussed with Athletics, UCLA Legal Affairs, and Compliance to determine how to best respond to and restructure reporting lines to meet the needs of this recommendation.	June 2020
	- Athletics Response The Associate Athletic Director for Compliance will add a dual reporting line, with a direct report line to UCLA's Chief Ethics and Compliance Officer. The Associate Athletic Director for Compliance also directly reports to the Senior Associate Athletic Director for Internal Operations, who also has a reporting line to the Vice- Chancellor for Legal Affairs. The Associate Athletic Director for Compliance and UCLA's Chief Ethics and Compliance Officer will coordinate regularly scheduled check-in meetings. The Associate Athletic Director for Compliance' job description will be updated to reflect this additional reporting line.	
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> <li>This practice is already in place at UCLA. Development staff does not communicate with UA staff regarding candidates for admission. We will document this more thoroughly as a result of the audit.</li> </ul>	December 2019

Recommendation	Management Corrective Action	Target Date
11.2 Perform a review prior to admission for each non-scholarship recruited athlete to identify any donations from any known relatives of the recruited athlete, or anyone that the Athletics department knows to be acting on behalf of the family. A member of Senior Leadership independent of the Athletics department or an existing Athletics Admissions oversight committee should oversee this review process, including determination of any due diligence required when donations are identified, and approval of any admissions decisions for which donations were identified.	- Starting with the 2017-18 entering class, UCLA has been conducting a giving history check for all non-scholarship prospective student athletes prior to presentation to the Student Athlete Admissions	December 2019

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