UCIRVINE | INTERNAL AUDIT SERVICES

Systemwide Audit of Undergraduate Admissions

Internal Audit Report No. I2019-601 October 21, 2019

Prepared By Loran Lerma, Manager, Investigations Larry Wasan, Manager, Technology Audits Approved By Mike Bathke, Director

UNIVERSITY OF CALIFORNIA, IRVINE

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INTERNAL AUDIT SERVICES IRVINE, CALIFORNIA 92697-3625

October 21, 2019

PATRICIA MORALES ASSOCIATE VICE CHANCELLOR ENROLLMENT MANAGEMENT

PAULA SMITH DIRECTOR INTERCOLLEGIATE ATHLETICS

RE: Systemwide Undergraduate Admissions Audit Report No. I2019-601

Internal Audit Services has completed the Systemwide Admissions review and the final report is attached.

We extend our gratitude and 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.

Mike Battle

Mike Bathke Director UC Irvine Internal Audit Services

Attachment A

C: Audit Committee

Enrique Lavernia, Provost and Executive Vice Chancellor Dale Leaman, Interim Executive Director, Undergraduate Admissions

I. BACKGROUND

In response to the recent Department of Justice's (DOJ) indictment involving several parties accused of misconduct to gain students' unlawful admission to top universities, including the University of California (UC), a systemwide internal audit of admissions was initiated at the request of the UC President. Under the direction of the Office of Ethics, Compliance and Audit Services (ECAS), an independent review and analysis of undergraduate admissions issues, including athletics admissions, is being coordinated with campus Internal Audit Departments (IAS) to perform an assessment of our admission practices throughout the UC system using a common systemwide audit program.

II. PURPOSE, SCOPE, AND OBJECTIVES

The purpose of the systemwide audit is to evaluate processes and controls over admissions and identify opportunities for improvement to ensure compliance with relevant policies and procedures and identify and reduce the risk of fraudulent admissions.

The audit's scope will be conducted in two phases. The first phase, which IAS completed in June 2019, consisted of gaining an understanding of the undergraduate general admissions process including policy, procedures and controls in place to prevent or detect fraudulent admissions, and ensuring compliance with relevant policy and regulations. IAS reviewed the process for admissions from athletics and other departments, recruited student athletes' participation in athletics programs, the admissions by exception process, and processes to verify application information.

The second phase, which began after completion of the first phase review, started in July 2019. The scope of the second phase will assess the effectiveness of controls identified in the first review and will include an in-depth review in selected areas, such as application verification controls, IT system access, and student athlete participation and monitoring. IAS plans to complete the second phase review by December 2019.

III. SUMMARY AND CONCLUSION

While admissions processes vary from campus to campus, IAS observed that, in general, UC Irvine campus does have certain controls over the admissions process to address

compliance with policy. IAS also identified controls within athletics and admissions to address admissions fraud risk. Although IAS did not identify control weaknesses specific to UC Irvine, the results of the systemwide audit found that several opportunities exist to strengthen these controls and further reduce the risk of admissions fraud in the following areas:

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

IAS is working with Admissions and Athletics management to address appropriate management corrective actions (MCAs) and target dates for each applicable recommendation using a standardized template. IAS will coordinate with ECAS to ensure the MCAs are appropriately addressed and resolved in a timely manner. IAS has added these opportunities for improvement and associated recommendations in response to the systemwide audit as Attachment A.

	Attachment A	
Recommendation	Management Corrective Action	Target Date
1.1 Document any local	Undergraduate Admissions:	12.31.19
policies and develop		
detailed procedures for	 Documented policies and 	Stakeholder:
all aspects of the	procedures currently exist for all	
application evaluation	aspects of the application and	Patricia
and admissions process,	admissions process, including	Morales,
to include the following:	those specified in	Associate Vice
• Criteria used to	recommendation 1.1; however,	Chancellor,
evaluate applications,	these are distributed across a	Enrollment
including any	range of formats and access	Management
qualitative factors	points. Pursuant to this	
considered, consistent	recommendation we will:	
with comprehensive	 Review and refine existing 	
review	documentation	
• Minimum	 Consolidate (to the extent 	
documentation	possible) into a single,	
requirements to	readily-accessible source	
demonstrate	 Train staff and external 	
application of criteria	readers on how to access	
in the evaluation	and navigate through this	
results	document	
• For freshman		
application		
evaluations that		
consider qualitative		
factors, a requirement		
that at least two		
independent		
documented		
evaluations support a		
decision to admit		

Target Date Recommendation **Management Corrective Action** 1.2 Document all Undergraduate Admissions: 12.31.19 admissions decisions with sufficient detail to: This information currently exists Stakeholder: • • Meet the minimum within the selection criteria which documentation is documented and maintained by Patricia requirements specified admissions management Morales. Associate Vice in the policies and Chancellor, procedures described Identity of readers – internal and in recommendation 1.1 external - are recorded in our Enrollment Indicate the specific admissions systems Management individuals and/or committees that were We will further enumerate, by ٠ involved in the title and function, all of the evaluation of the admissions management who are involved in the decision application and the final decision processing 3.2 Clearly identify and Undergraduate Admissions: Current: IAS verified track all applicants that This information currently exists within departments recommend documents on the basis of special the selection criteria, which is provided to talent. documented and maintained by Admissions by Athletics and admissions management using materials other submitted by recommending recommending departments. departments. Stakeholder: Patricia Morales. Associate Vice Chancellor, Enrollment Management

	Attachment A	
Recommendation	Management Corrective Action	Target Date
3.3 Establish and	Undergraduate Admissions & Athletics:	11.30.19
document the minimum		
requirements for	 Undergraduate Admissions will 	Stakeholder:
documented verification	work with recommending	
of special talent for each	departments to establish policy	Patricia
department. These	and minimum requirements for	Morales,
minimum requirements	documented verification of special	Associate Vice
should identify the types	talent.	Chancellor,
of information and		Enrollment
trusted sources that can	• In consultation with	Management
be used to confirm	recommending departments,	
qualifications or	Undergraduate Admissions will	Paula Smith,
credentials for a specific	establish business processes	Director,
sport or talent.	between departments for relaying	Intercollegiate
Requirements for	this information.	Athletics
documented verification		
of athletic qualifications		
could be limited to non-		
scholarship prospective		
student athletes.		

	Attachment A	
Recommendation	Management Corrective Action	Target Date
3.4 Require a two-step	Undergraduate Admissions & Athletics:	11.30.19
verification process for		
any recommendation for	• In consultation with	Stakeholder:
admission on the basis of	recommending departments,	
special talent that	Undergraduate Admissions will	Patricia
includes the following:	establish business processes	Morales,
• The initiator of the	between departments that	Associate Vice
recommendation must	confirm this two-step verification	Chancellor,
document and attest,	has been completed	Enrollment
under penalty of		Management
disciplinary action,	UCI Athletics will maintain	
that they have	documentation of recruiting	Paula Smith,
performed an	interaction and assessment of	Director,
assessment and	prospective student-athlete's	Intercollegiate
determined that the	athletic ability and potential	Athletics
level of special talent	contribution in its web based	
warrants a	Compliance software system. This	
recommendation for	documentation can be provided	
admission	as part of the Admission Tool	
 An individual in a 	upload or submitted separately as	
supervisory capacity	supplementary material for	
must approve the	Admission evaluation	
recommendation		
For athletics, this process	 May include Recruit Board, 	
could be limited to non-	Recruiting Activity, and	
scholarship prospective	NCAA Eligibility Center	
student athletes.	"Institutional Recruiting	
	List"	

Recommendation	Management Corrective Action	Target Date
3.5 For all non-	Undergraduate Admissions & Athletics:	11.30.19
scholarship prospective		
student athletes	Will require that the athletics compliance	Stakeholder:
recommended for	office verify the qualifications of all	
admission by athletics,	recommended applicants, in accordance	Patricia
require that the athletics	with the requirements referenced in	Morales,
compliance office verify	recommendation 3.3.	Associate Vice
the qualifications of the		Chancellor,
recommended applicant,		Enrollment
in accordance with the		Management
requirements referenced		
in recommendation 3.3.		Paula Smith,
		Director,
		Intercollegiate
		Athletics
3.6 Require all	Undergraduate Admissions:	12.31.19
admissions decisions for		
applicants recommended	Requiring that all admissions decisions	Stakeholder:
by departments on the	for applicants recommended by	
basis of special talent to	departments on the basis of special talent	Patricia
be approved by the	be approved by the admissions director	Morales,
admissions director or a	or a member of senior leadership	Associate Vice
member of senior	external to the recommending	Chancellor,
leadership external to	department is current practice in the UCI	Enrollment
the recommending	Office of Undergraduate Admissions.	Management
department.	This process will be described in an	
	updated Policies and Procedures	
	document.	

Recommendation **Management Corrective Action Target Date** 4.2 Establish a local Undergraduate Admissions: 12.31.19 campus policy that outlines acceptable Stakeholder: It is current practice in the UCI Office of rationale and the Undergraduate Admissions that an required evaluation individual who identifies a candidate for Patricia process for admissions admission by exception cannot make the Morales. by exception. At a final admission decision. This will be Associate Vice minimum, this policy Chancellor, documented in an updated Policies and should ensure that an Procedures document, which will also Enrollment individual who identifies outline acceptable rationale and the Management a candidate for required evaluation process for admission by exception admissions by exception. cannot make the final admission decision. 4.3 Establish controls to Undergraduate Admissions: 12.31.19 ensure that an acceptable rationale for identifying Admissions will create a policy requiring Stakeholder: an applicant to be that all applicants who are being considered for admission considered for Admission by Exception Patricia by exception is (A-by-E) be submitted for review by Morales, Associate Vice documented for each Admissions management, and the reason applicant being for A-by-E is documented for each and Chancellor, Enrollment considered under the signed off by management before the applicant can move forward through the policy. Management admissions process. 4.4 Establish local 12.31.19 Undergraduate Admissions: procedures to annually Stakeholder: monitor compliance with Will establish local procedures to the campus percentage annually monitor compliance with the limits for admissions by campus percentage limits for admissions Patricia exception established by by exception established by Regental Morales. Associate Vice Regental policy. policy. We will also establish a specific date to audit and document the Chancellor, percentage of admission by exception Enrollment Management

	Attachment A	
5.1 Establish	Undergraduate Admissions:	11.15.19
documented conflict of		
interest policies and	• Establish policy that requires	Stakeholder:
procedures that cover all	attestation of conflict of interest	
individuals who are	for all individuals involved with	Patricia
involved in reviewing	admissions processes, including	Morales,
admissions applications	the attestation that they are not	Associate Vice
or making admissions	aware of any attempt to	Chancellor,
decisions, including	improperly influence an	Enrollment
external readers. At a	admissions decision.	Management
minimum, these policies		
and procedures should	• We also require that all readers	
require that such	and those involved in the	
individuals annually:	selection process (i.e., admissions	
• Disclose the nature of	managers) to disclose the	
their acquaintance	following:	
with known	 any current or past 	
applicants, their	affiliations with high	
families or any other	schools/community	
potential conflict of	colleges/community-based	
interest and attest,	organizations (CBOs);	
under penalty of	 any external employment, 	
disciplinary action,	consulting or self-	
that they have recused	employment that is related	
themselves from	to college/university	
reviewing applications	admissions or other	
associated with these	academic advising	
potential conflicts	• the nature of their	
• Attest that they are not	acquaintance with any	
aware of any attempt	known applicants, their	
to improperly	families or any other	
influence an	potential conflict of interest	
admissions decision.		
	• All readers will attest that they	
	will recuse themselves from	
	reading an application from a	
	student with whom they are	
	familiar	

Recommendation	Management Corrective Action	Target Date
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.	 As an added control, develop processes to anonymize identity of all applicants, as well as the name of the high school/community college, which would strongly mitigate potential for conflicts of interest. Undergraduate Admissions: Regular training for all staff – including external readers – currently exists and is fully documented. We will update the training documentation to include information about improper influence in the context of admissions. 	11.15.19 Stakeholder: Patricia Morales, Associate Vice Chancellor, Enrollment Management
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.	Undergraduate Admissions: Will establish controls to prevent those who have affiliations with high schools or community colleges from being assigned an application of a student from that high school or community college for review.	11.15.19 Stakeholder: Patricia Morales, Associate Vice Chancellor, Enrollment Management

Recommendation	Management Corrective Action	Target Date
5.4 Establish controls	Undergraduate Admissions:	11.15.19
	Ondergraduate Admissions.	11.15.19
preventing individuals	Establish controls to provent these who	Stakeholder:
who perform outreach	Establish controls to prevent those who	Stakenoluer.
from reviewing	perform outreach from reviewing	Detricie
applications from	applications from individuals with	Patricia
individuals with whom	whom they have had more than routine	Morales,
they have had more than	contact.	Associate Vice
routine contact.		Chancellor,
		Enrollment
		Management
6.1 Implement controls	Undergraduate Admissions & IT:	12.31.19
to periodically review	In partnership with the compute chief	Stakeholder:
admissions IT system access to ensure that the	In partnership with the campus chief	Stakenoluer.
	information officer, establish a procedure	Detricie
level of access is aligned	for a regularly scheduled review of	Patricia
with job responsibilities	admissions systems access (including	Morales,
including, at a	levels of access, i.e., read/write/edit) to	Associate Vice
minimum, a review of	ensure that the level of access is aligned	Chancellor,
user access before each	with job responsibilities including, at a	Enrollment
annual admissions cycle	minimum, a review of user access before	Management
begins.	each annual admissions cycle begins.	
6.2 Implement controls	Undergraduate Admissions & IT:	12.31.19
to log activity in		
admissions IT systems	• In partnership with the campus	Stakeholder:
and periodically review	chief information officer, define	
high-risk changes, such	those data inputs/changes that	Patricia
as admissions decision	require review and monitoring;	Morales,
changes, for		Associate Vice
appropriateness.	• Establish a procedure for a	Chancellor,
Campuses should define	regularly reviewing these high-	Enrollment
high-risk changes to	risk transactions	Management
review and monitor.		0
		1

Recommendation	Management Corrective Action	Target Date
7.1 If the campus	Undergraduate Admissions & Athletics:	N/A
maintains a limit for		
athletics admissions	Not Applicable	
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.		

Recommendation	Management Corrective Action	Target Date
8.1 Establish a policy	Athletics:	10/31/19
addressing conflict of		
interest requirements for	UCI Athletics will establish	Stakeholder:
athletics personnel	ongoing education and update the	
including, at a	department Compliance Manual	Paula Smith,
minimum, a requirement	to include conflict of interest	Director,
to formally disclose and	policy for recruiting process.	Intercollegiate
review any known		Athletics
existing relationship	UCI Athletics personnel directly	
between a member of the	involved in the recruiting process	
athletics staff and a	will attest annually to their	
prospective student	knowledge of and agreement to	
athlete or their family to	comply with the requirement to	
determine if a potential	disclose any such relationship	
conflict of interest exists		
and whether it should be		
addressed with a		
management plan.		

	Attachment A	
Recommendation	Management Corrective Action	Target Date
8.2 Perform an analysis	Athletics:	Current for
to identify categories of		first 2 bullets.
third parties who contact	 UC Irvine policy states that 	10/31/19 for 3rd
the athletics department	admissions decisions are made	bullet
regarding prospective	exclusive of information or	
student athletes that are	influence from third parties or any	Stakeholder:
unusual or at a higher	individual other than UCI	
risk of inappropriately	Admissions Office	Paula Smith,
influencing admissions		Director,
decisions, such as	 UCI Athletics personnel have no 	Intercollegiate
donors, admissions	ability to inappropriately	Athletics
consultants, and athletic	influence admissions decisions, as	
recruiting/scouting	they are limited to only providing	
services not approved by	requests for admission	
the NCAA. Establish a	consideration of prospective	
requirement for all	student-athletes. Documentation	
athletics personnel to	validating merit of admission	
document all contact	consideration request is provided	
from these categories in	per 3.5	
a central repository.		
Athletics compliance	UCI Athletics will establish	
should at least annually	department policy requiring all	
review this list and	personnel to report to Athletic	
investigate any	Director any third party or other	
questionable contact.	contact (donor, family friend,	
	scholarship counselor, etc.) that	
	attempts to inappropriately	
	influence the recruiting or	
	admission process. The Athletics	
	compliance office will review this	
	list of third party or other contacts	
	at least annually.	

Recommendation	Management Corrective Action	Target Date
8.3 Provide regular	Athletics:	10/31/19
training to athletics		
personnel on the conflict	Athletics will provide regular training to	Stakeholder:
of interest requirements	athletics personnel on the conflict of	
discussed in	interest requirements referred to in 8.1	Paula Smith,
recommendations 8.1	and 8.2	Director,
and 8.2.		Intercollegiate
		Athletics

in an athletic program def for non-scholarship str student athletes pa recommended for th admission by the act athletics department. at This policy should re include: U	 UCI Athletics will establish department policy for first year student-athletes requiring participation in their sport through the conclusion of the academic year. Any student-athlete failing to meet this requirement will be submitted to UCI Office of Admissions for review. This policy will be located in Student-Athlete Handbook and Compliance Manual. It will include: Exceptions to the participation requirement
one year of participationUin an athletic programdefor non-scholarshipststudent athletesparecommended forthadmission by theacathletics department.atThis policy shouldreinclude:U• Any exceptions to thisrerequirementApprovalrequirements for anyexceptions to thepolicy• Consequences for	department policy for first year student-athletes requiring participation in their sport through the conclusion of the academic year. Any student- athlete failing to meet this requirement will be submitted to UCI Office of Admissions for review.
	 Approval requirements for any exceptions to the policy Reference to potential consequences or sanctions from the University based on review by Campus

Recommendation	Management Corrective Action	Target Date
	 Athletics will identify our understanding as to why a student is no longer participating 	
9.2 As a condition of admission, require non- scholarship athletes recommended for	Undergraduate Admissions & Athletics: As a condition of admissions, require	10/31/19 Stakeholder:
admission to sign an agreement that they will comply with the minimum participation requirement, subject to the consequences established in the policy.	non-scholarship athletes recommended for admission to sign an agreement that they will comply with the minimum participation requirement, Referred to in 9.1	Patricia Morales, Associate Vice Chancellor, Enrollment Management Paula Smith, Director, Intercollegiate Athletics
9.3 Establish controls to ensure records supporting ongoing participation in athletics are kept current throughout the season.	Athletics: As required by the NCAA manual and current Athletics Compliance Handbook, the Compliance Office reviews the monthly participation logs to ensure they are current, complete; participation requirements are met, and are in compliance with NCAA and institutional requirements.	Current: IAS verified participation logs maintained in ARMS on 7/30/19 Stakeholder: Paula Smith, Director, Intercollegiate Athletics

Recommendation 9.4 Establish controls to independently monitor compliance with the one- year minimum participation requirement for non- scholarship student athletes recommended for admission.	 Management Corrective Action Athletics: When Compliance reviews submitted activity and participation logs, they will be compared to rosters to determine if any student is identified as not participating. In any instance that a first year student-athlete is identified as not participating, Compliance will follow up with Head Coach to determine if student-athlete has removed themselves from the program. First year student-athletes who are removed or remove themselves from their respective sport program for any reason will be provided to the Athletics Director for consideration of any reasonable exception and then submitted to Campus officials for further review of exception or determination of sanction for student-athletes.	Target DateImmediatelybeginningwith 2019-20first yearstudent-athletesTarget date fordocumentationandverification ofprocedures:10/31/19Stakeholder:Paula Smith,Director,IntercollegiateAthletics		
9.5 Provide regular training to athletics staff on the minimum participation policy requirements.	Athletics: Regular training to athletics staff on the minimum participation policy requirements is part of annual education; initially, first Fall Coaches' Meeting and then ongoing throughout the year	Beginning October 2019 and ongoing Stakeholder: Paula Smith, Director, Intercollegiate Athletics		

Recommendation	Management Corrective Action	Target Date
10.1 Restructure the	Athletics:	10/31/19
reporting relationship of		
the campus athletics	UCI Athletics will confer with campus	Stakeholder:
compliance officer to add	senior leadership to determine	
a direct reporting line to	appropriate steps to put in place a	Paula Smith,
the campus chief ethics	reporting structure where the athletics	Director,
and compliance officer.	compliance officer has a direct reporting	Intercollegiate
	line to the campus chief ethics and	Athletics
	compliance officer.	
11.1 Establish a policy	Undergraduate Admissions:	12.31.19
limiting communication		12.01.17
between development	Establish policy that defines/makes	Stakeholder:
personnel and the	explicit the content of inappropriate	
admissions office	communication/subject matter between	Patricia
regarding admissions	the advancement and undergraduate	Morales,
matters. At a minimum,	admissions offices. The policy will	Associate Vice
any communication	prohibit such inappropriate	Chancellor,
regarding the admission	communication, and at a minimum,	Enrollment
status of specific	prohibit communication regarding the	Management
applicants should be	admission status of specific applicants.	
prohibited.		

Attachment A

	Attachiment A	
Recommendation	Management Corrective Action	Target Date
11.2 Perform a review	Undergraduate Admissions & Athletics:	10/31/19
prior to admission for		
each non-scholarship	 Establish policy and process in 	Stakeholder:
recruited athlete to	conjunction with Advancement to	
identify any donations	cross check non-scholarship	Patricia
from any known	recruited student-athletes for any	Morales,
relatives of the recruited	known connections with	Associate Vice
athlete, or anyone that	donations.	Chancellor,
the athletics department		Enrollment
knows to be acting on	• Establish processes such that a	Management
behalf of the family. A	member of senior leadership	
member of senior	independent of the athletics	Paula Smith,
leadership independent	department or the local Academic	Director,
of the athletics	Senate Committee would oversee	Intercollegiate
department or an	this review process including	Athletics
existing athletics	determination of any due	
admissions oversight	diligence required when	
committee should	donations are identified, and	
oversee this review	approval of any admissions are	
process, including	independent of any donations.	
determination of any		
due diligence required		
when donations are		
identified, and approval		
of any admissions		
decisions for which		
donations were		
identified.		