

UNIVERSITY OF CALIFORNIA
ETHICS, COMPLIANCE AND AUDIT SERVICES
OFFICE OF THE PRESIDENT
INTERNAL AUDIT SERVICES

SYSTEMWIDE AUDIT OF UNDERGRADUATE ADMISSIONS
Project No. P19A019
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Executive Summary

Introduction

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

This summary report was developed based on information gathered by each location's internal audit department and provides a consolidation of the systemwide findings and a set of systemwide recommendations. Each campus's internal audit department will issue a separate report addressing its local observations and associated planned management corrective actions, as well as corrective actions to address each of the systemwide recommendations identified in this report.

This audit assessed the design of internal controls over the admissions process and related processes. In fiscal year 2019-2020, ECAS will oversee a second audit of admissions to assess the operating effectiveness of controls identified in this review.

Objectives and Scope

In the fourth quarter of fiscal year 2018-19, ECAS directed all internal audit departments at campuses with undergraduate programs to set aside hours in their annual audit plans for a systemwide audit of admissions. The objective of the audit was to evaluate the design of controls over undergraduate admissions throughout the system, including controls over admission of student athletes and other non-standard admissions, that facilitate compliance with relevant policies and regulations and reduce exposure to potential admissions fraud risk.

Audit procedures were conducted at each of the nine UC campuses with undergraduate programs and at the Office of the President using a common audit program developed for this review by ECAS. These procedures included process walkthroughs and reviews of policies and other documentation used as part of the admissions process. The audit assessed the design of controls that campus internal audit departments identified in the process walkthroughs. However, we did not assess the organization's adherence to these controls as part of this audit. A second audit, scheduled for fiscal year 2019-2020, will assess the operating effectiveness of controls identified in this review, including any effects that may be found as a result of potential deficiencies.

The scope of 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 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

ECAS coordinated this audit and oversaw the work performed by the campus internal audit departments. The local internal audit teams collected information as part of this audit and provided it to ECAS for the development of this report. ECAS reviewed this information and requested clarification and additional information as necessary. Upon issuance of this report, each campus's internal audit department will work with campus management to identify appropriate campus-specific management corrective actions, with assigned target dates, to address each of the recommendations in this report, as well as any local observations. The campus internal audit departments, with oversight from ECAS, will track these management corrective actions to ensure completion.

Overall Conclusion

While admissions processes vary from campus to campus, we observed that, in general, each campus does have certain controls over the admissions process to address compliance with policy. We also identified controls within athletics and admissions to address admissions fraud risk. However, we found 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

These opportunities for improvement and associated recommendations are described in detail in this report.

Background

Overview of the University of California Admissions Process

The nine UC undergraduate campuses vary significantly with respect to the specific details of the processes that they use to evaluate applications for undergraduate admission. Nonetheless, the campuses' processes share a similar overall sequence of events. Applicants begin the process by applying to one or more UC campuses through the University's "My UC Application" website. The systemwide Department of Undergraduate Admissions (Systemwide Undergraduate Admissions) then distributes applicants' information to the respective campuses to which they have applied for admission. During the application submission period, trained readers at campus admissions offices begin to review and evaluate applications using the comprehensive review process, which we describe later in this report. As part of comprehensive review, campus admissions offices also identify certain applicants who do not meet minimum academic requirements to be considered for an exception as permitted by policy. As a result of their comprehensive reviews of applications, campus admissions offices assign an evaluation to each application.

Once the application deadline has passed and the University has distributed all applications to the campuses, the campus admissions and enrollment management offices and local Academic Senate admissions committees coordinate to determine the population of students that they can accept. These population determinations allow the admissions offices to make provisional admissions decisions. After the admissions offices perform quality checks of their application evaluations, they finalize their admissions decisions and send decision letters to applicants. Admitted applicants then have time to accept or decline the campuses' offers and return a statement of intent to register if they accept an offer. Finally, all campuses require applicants who accept offers of admission to verify their grades and standardized test scores by requesting that their schools and testing organizations, respectively, send corresponding documentation directly to campus admissions offices.

Role of the Academic Senate

The Board of Regents has empowered the Academic Senate to exercise direct control over academic matters of central importance to the University. The Academic Senate's scope of authority includes determining academic policy, setting conditions for admission and the granting of degrees, authorizing and supervising courses and curricula, and advising the administration on faculty appointments, promotions, and budgets.

The Academic Senate established its Board of Admissions and Relations with Schools (BOARS) to provide faculty oversight of undergraduate admissions. BOARS regulates the policies and practices used in the admissions process that are specific to the University's educational mission and the welfare of its students, and also recommends and directs efforts to improve the admissions process.

Admissions Requirements

The admissions requirements for UC are the minimum academic standards that a student must attain to be considered for admission. However, meeting the minimum standards does not

guarantee admission. Specific minimum qualifications for freshman applicants include A-G subject requirements (see Appendix 2), examination requirements (SAT with Essay or ACT with Writing scores), and a minimum GPA of 3.0 for California residents and 3.4 for non-residents. Applicants who do not meet UC’s minimum requirements may be considered if they score high on the ACT with Writing or the SAT and two SAT subject tests. UC also requires applicants to be proficient in the English language.

Comprehensive Review

The nine UC undergraduate campuses independently review each application for admission using a process known as comprehensive review. The comprehensive review process was adopted by the Board of Regents in 2001 with the implementation of Regents Policy 2104 (Policy on Comprehensive Review in Undergraduate Admissions), which states that “students applying to UC campuses are evaluated for admission using multiple measures of achievement and promise while considering the context in which each student has demonstrated academic accomplishment.” Under comprehensive review, evaluators may look beyond test scores and grades to evaluate an applicant’s academic achievements by considering factors other than traditional academic performance, such as applicants’ high school environment, personal accomplishments, family environment, and other circumstances.

BOARS developed guidelines for selection criteria under comprehensive review, including specific factors that campuses may consider as part of the review process for freshman and transfer admissions. BOARS suggests 14 factors for consideration of freshman applicants, including six non-academic and eight academic factors, as shown in the table to the right. For transfer applicants, the BOARS guidance recommends consideration of nine factors that consist of four non-academic and five academic factors, three of which involve transfer-specific admissions requirements. See Appendix 1 for further detail on each of the comprehensive review factors that campuses consider for freshman and transfer applicants.

Comprehensive Review Factors for Freshman Applicants

Academic Factors	Non-academic Factors
Grade point average	Special project achievements in any academic field
Test scores	Improvement in academic performance
Performance in and number of courses beyond minimum A-G requirements*	Special talents, achievements, and awards
UC-approved honors courses and advanced courses	Completion of special high school projects
Eligibility in the Local Context (CA residents only)	Academic accomplishment in light of life experiences
Quality of senior year program of study	Geographic location
Academic opportunities in California high schools	
Outstanding performance in one or more academic subject areas	

*A-G requirements consist of high school courses that students must complete with a letter grade of C or better to be eligible for admission.

The specific implementation of the comprehensive review process varies by campus. The methods that UC campuses use have evolved over time, from fixed-weight on some factors like a combination of grade point average (GPA) and test scores, to some combination of an index or fixed weight and a separate review of non-academic factors, to no fixed weight on any criteria (holistic method). Currently, most campuses use the holistic method to evaluate applications for admission. As part of comprehensive review, most campuses conduct multiple reviews of each application, which may include automated application evaluation to assess quantitative elements, such as GPA and test scores.

Eligibility in the Local Context

Eligibility in the Local Context (ELC) is one of the factors that campuses consider as part of comprehensive review. ELC is a factor comprised of California high school students' ranks within their high school classes. Specifically, the University identifies the top nine percent of students at each high school based on GPA in UC-approved coursework. If those students also have a GPA of at least 3.0 and have completed certain courses, the University designates them as ELC and the campuses to which they have applied consider this factor along with other comprehensive review factors. Campuses that ELC applicants select may not be able to offer them admission, and so other campuses that have space will offer them admission instead.

Admissions by Exception

Regents Policy 2105 (Policy on Undergraduate Admissions by Exception) and Academic Senate regulations allow a campus to admit a small number of applicants who may not meet all minimum admission requirements, but demonstrate high potential for academic success and leadership and are otherwise competitive for admission. Campuses use 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 athletic ability, who have demonstrated potential to succeed academically at the University. A campus may enroll up to six percent of its incoming freshman class under the admission by exception policy, up to four percent of which may be disadvantaged students, but in practice, according to Systemwide Undergraduate Admissions, the University has granted admission by exception to less than two percent of all new enrollees over the last several years. Applicants that campuses consider for admission by exception undergo an additional qualitative review beyond the comprehensive review used to determine initial admissibility.

Application Verification Process

As noted earlier in this report, each campus verifies the grades and standardized test scores of applicants who accept offers of admission. This process occurs throughout the application cycle and continues through the summer and into fall.

Separately, in conjunction with the adoption of the University's comprehensive review policy for admissions, in 2002 Systemwide Undergraduate Admissions began verifying the academic and non-academic achievements of a limited sample of applicants through the use of a third-party vendor. Multiple parts of the admission application are subject to random verification: non A-G coursework (freshman only), honors and awards, extracurricular activities, volunteer work and community service, special program participation, employment, and information contained in the

personal insight question responses. The University provides notice in the application that information may be verified, including in the affidavit and electronic signature required for submission.

Systemwide Undergraduate Admissions conducts its application verification process after applications are submitted, but before admissions decisions are made. According to Systemwide Undergraduate Admissions, the number of applicants that it selects for verification is statistically significant and therefore provides a reasonable foundation for ensuring that those who have falsely reported application information can be detected.

The University denies or revokes admission to all UC campuses for students that it identifies as having falsified their application information, regardless of whether that information was used in an admission decision at a particular campus. According to Systemwide Undergraduate Admissions, as a result of its requests to verify achievements, the University typically cancels nearly 100 applications per year due to nonresponse, versus fewer than half a dozen per year due to admitted falsification.

Special Talent Admissions (“Special Admissions”)

Campus athletics and certain academic units, such as specialty schools, provide admissions or other designated offices with recommendations for applicants that they have identified as having athletic qualifications or other special talents, respectively. Similarly, other individuals affiliated with a campus, such as a band leader or debate coach, could also recommend an applicant whose ability they believe would be beneficial to their program or team. For the purposes of this report, we will define this category of admissions as “special admissions.” Campus admissions offices factor these special talents into their overall assessments of applicants under comprehensive review. In addition, campus admissions offices may consider applicants who have special talent recommendations for admission by exception, which is discussed above.

Opportunities for Improvement and Recommendations

1. Documentation Supporting the Admissions Process

Campuses could promote policy adherence and process consistency as well as reduce the risk of fraud in the admissions process through improvements in admissions process documentation. Specifically, these improvements consist of developing documentation of all local admissions policies and procedures and documenting sufficient supporting details for admissions decisions and recommendations.

Sufficient documentation of local admissions policies and procedures is necessary to establish clear guidance, maintain consistency in the admissions process, and reduce the risk of fraud. A few campuses lack such documentation altogether, and although the majority of campuses have documented certain admissions-related policies and procedures, they may not be of sufficient breadth and depth to promote both systemwide and local policy objectives and mitigate process irregularities.

All campuses record the actual admissions decisions that result from their review of applications, but vary in terms of the supporting details that they document. For example, a campus may not document who evaluated an application or made the final admissions decision. In addition, most campuses do not document the bases for admissions decisions that were influenced by qualitative factors, such as academic accomplishment in light of life experiences. However, at a minimum, each campus should clearly document the criteria it considers in application evaluations and ensure that the documentation supporting its evaluations demonstrates implementation of these criteria. Maintaining adequate documentation of application evaluations consistent with comprehensive review requirements helps to reduce the risk of fraud and serves as a basis to demonstrate adherence to policy requirements.

As noted earlier in this report, BOARS guidance for comprehensive review recommends consideration of fewer factors for transfer than freshman applicants. Specifically, BOARS guidance for transfer applicants recommends consideration of nine factors that consist of four non-academic and five academic factors, three of which involve transfer admission requirements, such as general education and major prerequisite courses. Because of the precise and quantifiable nature of these transfer-specific academic factors, transfer applicants generally pose a lower risk of fraud in the admissions process.

Recommendations

Campuses should:

- 1.1 Document any local policies and develop detailed procedures for all aspects of the application evaluation and admissions process, to include the following:
 - Criteria used to evaluate applications, including any qualitative factors considered, consistent with comprehensive review
 - Minimum documentation requirements to demonstrate application of criteria in the evaluation results

- For freshman application evaluations that consider qualitative factors, a requirement that at least two independent documented evaluations support a decision to admit

1.2 Document all admissions decisions with sufficient detail to:

- 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

2. Verifying Application Information

As discussed earlier in this report, Systemwide Undergraduate Admissions performs an annual verification of academic and non-academic achievements of a limited sample of applicants through the use of a third-party vendor. Systemwide Undergraduate Admissions could reduce the risk of fraudulent admissions resulting from undetected false application information by strengthening this process. Increasing the likelihood of detecting false information would maintain the integrity of the University’s practice of considering a variety of factors in admissions under its comprehensive review policy.

Although the campuses ultimately verify the academic qualifications of all admitted students, we observed that none of the campuses verify non-academic application information at any time because they rely on the verification process facilitated by Systemwide Undergraduate Admissions. Under this process, prior to the campuses making admissions decisions, Systemwide Undergraduate Admissions selects what they have determined to be a “statistically significant” number of applications for verification of an application item. These can include items such as non A-G coursework, honors and awards, extracurricular activities, volunteer work and community service, special program participation, employment, self-reported academic record, and information contained in personal insight question responses. However, we noted that Systemwide Undergraduate Admissions determined the statistical significance of the sample a number of years ago, when the size of the application population was significantly smaller, and did not document this analysis.

During our review of the verification process, we found weaknesses that suggest that the implementation of the process is not as robust as the previously determined statistical significance of its sample size may suggest. Undergraduate Admissions selects only one item per application for verification rather than multiple items when present. Further, across the overall population of applications, Systemwide Undergraduate Admissions selects the same number of sample items (one) for each application section regardless of the relative risk of falsification.

We also found that it would be difficult for Systemwide Undergraduate Admissions to determine the actual rate of falsified application information that it may be detecting through the annual verification process for two reasons: First, a significant number of students do not respond to the University’s request to verify application information. Second, an applicant may be permanently excused from the verification process if they provide an acceptable explanation for their inability to obtain documentation for an item. The number of permanent excusals granted for 2017, 2018 and 2019 was two, three and 18, respectively, out of 1,000 applications reviewed. Systemwide

Undergraduate Admissions does not formally document its approval of permanent excusals or their rationale.

Finally, we observed that the efficacy of Systemwide Undergraduate Admissions' annual application verification process is inherently limited by an assumption that the requested information provided by applicants is authentic. We noted that the university has limited ability to address this risk through internal controls.

Recommendations

Systemwide Undergraduate Admissions should:

- 2.1 Document the methodology used to determine the sample size for the annual verification process and annually reassess the sample size based on the current size of the applicant population.
- 2.2 Perform a risk analysis to determine the relative risk of falsification for each application section and, where present, increase the number of sample items that it selects from each application section according to the risk of falsification as determined by this analysis. As part of this analysis, consider the rate of nonresponse for each category in addition to the rate of identified falsification.
- 2.3 Develop formal requirements that it must follow for granting and approving permanent excusals from the verification process, including:
 - Required follow-up steps when an applicant reports that they are unable to provide supporting documentation for an item being verified, including a requirement to seek alternate documentation such as personal statements from third parties
 - A requirement to document its analysis and rationale for granting a permanent excusal
 - Approval requirements for permanent excusals

3. Special Talent Admissions (“Special Admissions”)

As part of the comprehensive review process, campus admissions offices consider recommendations from campus units or individuals that are based on special talent, such as in athletics or the arts, which we have defined as “special admissions.” These recommendations may come in the form of lists of prospective student athletes or summary scores of talent-based portfolios that are reviewed by a department. In our walkthroughs, we observed that the documentation supporting these recommendations is not always sufficient to ensure that the special talent is verified and legitimate.

In order to mitigate the risk of undue influence or fraud associated with these “special admissions,” this category of applicants requires a higher level of control. There are opportunities for campuses to implement additional protocols to ensure that the recommendations are authentic and adequately supported. To help ensure the legitimacy of the

special talent qualifications that are considered in admissions decisions and reduce the risk of fraudulent recommendations, departments should institute stronger controls for the verification and approval of recommendations before forwarding them to the admissions office.

For a variety of reasons, we observed that the risk of fraudulent admissions for prospective student athletes is significantly lower for those who are offered athletic scholarships. NCAA regulations include requirements for scholarship athletes that make it difficult for coaches to place those who are unqualified on a team roster, including restrictions on the amount of scholarship aid that can be granted, limits by sport on the number of student athletes to whom universities may award scholarships, and the four-year guaranteed scholarship provision, under which a student athlete's scholarship is removed if they do not remain on the team for a full four years. Coaches are under significant pressure to achieve competitive success, and there are numerous financial and reputational motivating factors that incentivize them to reserve the limited number of scholarships under their control for only the most talented players. Additionally, players on athletic teams are typically aware of which members are on scholarships and would likely raise questions regarding those with clear deficiencies in talent. For these reasons, several of this report's recommendations are limited to non-scholarship student athletes.

Recommendations

Systemwide Undergraduate Admissions should:

- 3.1 Develop and issue guidance to clarify the definition of special talent to ensure that campuses consistently identify and track the population of applicants that departments recommend on the basis of special talent.

Campuses should:

- 3.2 Clearly identify and track all applicants that departments recommend on the basis of special talent.
- 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.
- 3.4 Require a two-step verification process for any recommendation for admission on the basis of special talent that includes the following:
 - 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 recommendationFor athletics, this process could be limited to non-scholarship prospective student athletes.

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.

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.

4. Admissions by Exception

As discussed earlier in this report, admissions by exception is the policy under which a campus may admit an applicant who does not meet the minimum UC requirements for admission, but who demonstrates high potential for academic success and leadership. In our walkthroughs, we observed that only a few campuses have established local documented policies and procedures for admissions by exception to supplement Regental policy.

In July 1996, the Regents issued Policy 2105: Policy on Undergraduate Admissions by Exception. This Regental policy describes the general purpose of admissions by exception but does not include specific characteristics to consider. In 2005, the Board of Admissions and Relations with Schools (BOARS) prepared a guidance document entitled “Guidelines for Implementation of University Policy on Admission by Exception” that outlines five principles for admissions by exception and six recommended categories of applicants to consider for admissions by exception.

Some campuses have developed local policies and procedures modeled after the BOARS guidance document to further detail aspects of the Regental policy, such as any campus-specific minimum qualifications, and define their local evaluation processes. Since the purpose of admissions by exception is to allow for some flexibility at the campus level, campus policies and procedures for admissions by exception that are consistent with Regents policy can serve as a valuable resource to assist campuses in identifying potential admissions by exception applicants and help ensure consistency in the policy’s application.

We further observed that not all campuses explicitly document the exceptional characteristics that caused an applicant to be considered for admissions by exception. A reader or evaluator typically identifies or flags an application or student record in the admissions system, which could take the form of selecting admissions by exception as a reason from a drop-down menu or applying a special admit code. These methods would be appropriate if the available options specifically identified the exceptional characteristic, as opposed to just identifying the applicant as an admission by exception candidate. Further, we observed that admissions by exception candidates are not always independently reviewed and approved by someone other than the individuals who initially selected the applicants to be considered for admissions by exception. A secondary review and approval would help to ensure that proposed admissions by exception are reasonable and appropriate according to local policies and procedures.

On average, the rates of admissions by exception are low. According to Systemwide Undergraduate Admissions, for fall 2018, the systemwide admissions by exception rates for

freshman and transfer admissions were 1.9% and 1.7%, respectively. However, during this period, one campus exceeded the 6% admissions by exception enrollment limit for freshman admissions and transfer admissions. Another campus also exceeded the 6% admission by exception limit for transfers, but due to the small size of the transfer class, the difference was only one student. During our analysis of admissions by exception rates by campus, we observed indications that campuses were capturing the number of admissions by exception inconsistently, suggesting the need for systemwide guidance on measuring admissions by exception.

Recommendations

Systemwide Undergraduate Admissions should:

- 4.1 Develop and issue guidance for measuring admissions by exception rates to ensure that campuses are measuring them consistently.

Campuses should:

- 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.
- 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.
- 4.4 Establish local procedures to annually monitor compliance with the campus percentage limits for admissions by exception established by Regental policy.

5. Conflict of Interest in Admissions Review

Overall, campuses have not systematically reviewed and developed measures to control conflict of interest in the admissions process. Campuses could reduce the resulting risk of fraudulent admissions by further developing and documenting local policies and procedures, providing related training to affected personnel, and implementing controls over external readers and outreach staff.

Notably, most campuses lack sufficient documented conflict of interest policies and procedures that cover all individuals who participate in or influence the review of applications for admission, although they generally have some provision for addressing conflict of interest for application readers. At most campuses, these readers consist of both career admissions employees and temporary staff (external readers) due to their significantly increased workload during the admissions season. External readers are at a higher risk than career employees for potential conflicts of interest, due both to the temporary nature of their University employment as well as their current or past regular employment. For example, external readers may be employed as local high school teachers or counselors, and may wish for students from their schools to be admitted. In addition, at most campuses readers include outreach staff and

admissions staff who perform outreach activities as one of their duties. These individuals are also at a high risk for conflicts of interest because the nature of their work can result in their becoming prejudiced in favor of applicants with whom they have had more than routine contact.

A few campuses have included conflict of interest procedures in their reader training manuals, such as instructing readers not to review known applicants, and a few other campuses require readers to sign statements that they will recuse or have recused themselves from reviewing all applications submitted by applicants with whom they are acquainted. In addition, one campus has a policy that precludes readers from reviewing known applicants, and another randomly assigns applications to readers. However, none of the campuses has a comprehensive set of policies and procedures that cover all individuals involved in the process, such as other admissions and outreach staff who may exercise discretion over admissions decisions, including admissions management, and other individuals outside of admissions who can also influence decisions, such as faculty and athletics staff.

Recommendations

Campuses should:

- 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:
 - 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
 - Attest that they are not aware of any attempt to improperly influence an admissions decision.
- 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.
- 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.
- 5.4 Establish controls preventing individuals who perform outreach from reviewing applications from individuals with whom they have had more than routine contact.

6. Admissions IT System Access

The campus admissions offices throughout the system use 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. For example, certain individuals have the ability to change admissions decisions in the system. To ensure that only authorized individuals have access to admissions-related IT systems and their levels of access are appropriate, and to reduce the risk of fraudulent or unauthorized activity, it is important that campuses implement controls to monitor access rights to all admissions IT systems and ensure that those rights align with job responsibilities. It is of equal importance to ensure that controls are in place to review and approve changes to access rights and monitor changes to applicant information.

In our walkthroughs, we observed that several campuses did not specifically identify the appropriate system access role associated with staff position titles and functions. We further observed that one campus did not promptly remove access to the admissions system for certain users who no longer required access. Periodic checks of the IT system access rights of all users are essential to ensure that only authorized individuals have IT system access and that their levels of access are appropriate. Further, campuses should review and approve any requests for access changes. Accordingly, campuses would benefit from documenting access provisioning and review processes to ensure that access is only provided to authorized individuals and is consistent with their roles and responsibilities.

Although all campuses log or have the capability to log user activity, we identified a number of campuses that do not monitor user activity on admissions-related IT systems. The lack of a monitoring process for IT system changes or overrides, such as editing admissions decisions, may allow inappropriate or unauthorized admissions decisions to go undetected.

Recommendations

Campuses should:

- 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.
- 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.

7. Athletics Department Recommendation Limits

At some campuses, the athletics department is limited to a specific number or range of “slots” for recommendations for admission in a given year. The purpose of these limits is to establish a maximum number of prospective student athletes that can be “tagged” by the athletics department as recommendations for admission. Typically, these limits are negotiated between athletics and campus admissions. Most campuses indicated that there is some level of periodic monitoring of the limit, typically by admissions or an oversight committee. However, this

monitoring is typically informal and does not occur based on an established frequency. At some locations, the limit has remained unchanged for several years. If these limits are not independently reviewed on a regular basis according to established criteria, there is a risk that athletics may “tag” more student athletes than needed to fill team rosters, creating a potential opportunity to use these extra spaces for fraudulent admissions.

Recommendation

Campuses should:

- 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.

8. Conflict of Interest in Athletics

We observed that most campuses do not have formal protocols in place to identify and review personal relationships between athletics personnel and prospective student athletes or their families, nor established mechanisms to identify and report suspicious contact from third parties regarding prospective student athletes. Without protocols to control potential conflicts of interest, there is a risk that relationships could be exploited to gain fraudulent admission to the university. In our walkthroughs, we observed that some campuses have established certain protocols within their athletics departments to address risks associated with conflicts of interest, such as a standing practice to ask questions of recruits related to potential conflicts of interest. However, most campuses do not have comprehensive policies in place to identify and manage potential conflicts of interest in athletics.

Recommendations

Campuses should:

- 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.
- 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.

8.3 Provide regular training to athletics personnel on the conflict of interest requirements discussed in recommendations 8.1 and 8.2.

9. Monitoring Student Athletes' Participation in Athletic Programs

To mitigate the risk of fraudulent admissions based on falsified athletic profiles or bribery of athletics officials, campuses have opportunities to implement additional protocols to ensure that student athletes participate in the athletic programs for which they were recruited. These protocols would help to ensure the legitimacy of the athletic qualifications that are considered in admissions decisions.

In our walkthroughs, we observed that only two campuses have established requirements for a minimum period of participation in athletics programs for student athletes. Both of these campuses have established a one-year minimum participation requirement, with certain exceptions, such as injuries. Further, while some campuses have implemented protocols to monitor participation, such as periodic reviews of active rosters, these protocols could be strengthened to ensure that each student's ongoing participation in an athletic program is actively monitored. There is a risk that rosters or other documentation supporting student athletes' participation could be manipulated by coaches or other personnel. If there are poor controls over the integrity of active rosters, the quality of monitoring protocols based on this information will be compromised.

It is important for each campus to ensure that effective controls are in place to record ongoing active participation in athletic programs and monitor each recruited student athlete's participation status to identify cases of possible fraudulent admission.

Recommendations

Campuses should:

- 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:
 - Any exceptions to this requirement
 - Approval requirements for any exceptions to the policy
 - Consequences for violating the policy
- 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.
- 9.3 Establish controls to ensure records supporting ongoing participation in athletics are kept current throughout the season.

9.4 Establish controls to independently monitor compliance with the one-year minimum participation requirement for non-scholarship student athletes recommended for admission.

9.5 Provide regular training to athletics staff on the minimum participation policy requirements.

10. Independence of Athletics Compliance

As part of the UC compliance structure, each campus has established a chief ethics and compliance officer (CECO). The role of the CECO is to provide facilitation and leadership to the campus community on compliance risks and, where appropriate, advice and counsel to the Chancellor and senior management, including reporting of potential or perceived compliance and ethics issues. Notably, the CECO also directly reports to the Systemwide Chief Compliance and Audit Officer, which provides a means to independently report matters of concern to the Board of Regents. The CECO, along with the campus ethics, compliance and audit committees, provide the structure and guidance to implement an effective systemwide compliance program.

The athletics compliance office at each campus provides oversight and guidance to ensure adherence to all regulations created for the governance of intercollegiate athletics. Campus athletics compliance officers report to their respective athletics directors. The campus athletics compliance departments also provide student athletes, coaches, and staff with the knowledge needed to be successful within the guidelines provided by NCAA rules, and help maintain integrity in the area of athletics compliance.

In our walkthroughs, we observed that at most campuses the athletics compliance officer oversees important monitoring activities that could identify inappropriate or fraudulent activity, but does not have a reporting relationship independent of the athletics director, making them vulnerable to undue influence. This current reporting structure may inhibit athletics compliance from reporting issues to campus, and ultimately, systemwide leadership. Given that the UC Ethics and Compliance Program infrastructure is intended to include a broad cross-section of stakeholders from all University locations and specific risk areas, the addition of athletics compliance reporting to the CECO would be appropriate. We view a reporting structure that includes the CECO as a leading practice that all campuses should adopt.

Recommendation

Campuses should:

- 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.

11. Monitoring of Donations and Admissions

Regental policy articulates the university's position regarding the consideration of financial benefit to the university in admissions decisions. Specifically, Regents Policy 2202, Policy Barring Development Considerations from Influencing Admissions Decisions, states, "admissions motivated by concern for financial, political or other such benefit to the University do not have a place in the admissions process." We observed that there is an opportunity to strengthen the language in this policy to more explicitly prohibit development and legacy considerations from influencing admissions decisions.

In our discussions with admissions personnel for this audit, each campus confirmed that, as a matter of practice, they do not consider donations to the campus or whether applicants are related to alumni (legacy admissions) when making admissions decisions.

To provide additional assurance that admissions decisions are not motivated by concern for financial benefit to the University, campuses should implement protocols to limit communication between development and admissions. Further, they should implement processes to periodically review large donations to the campus to identify potential admissions decisions that these donations could have influenced. We observed that two campuses have implemented protocols to review donations as part of athletics admissions review. However, non-athletics admissions also face the risk of being influenced by donations to the campus.

Recommendations

Campuses should:

- 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.
- 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.

Internal Audit should:

- 11.3 Periodically perform a retrospective review of donations to the campus to identify admissions decisions that could have been influenced by these donations. Any questionable admissions decisions identified through this process should be referred to the Locally Designated Official for investigation.

Appendix 1: Comprehensive Review Factors

The following descriptions provide further detail regarding the University of California's comprehensive review factors for freshman and transfer applicants.

For Freshman Applicants

1. Academic grade point average in all completed "a-g" courses, including additional points for completed UC-certified honors courses.
2. Scores on the ACT With Writing or SAT Reasoning Test.
3. Number and content of, and performance in, academic courses beyond the minimum "a-g" requirements.
4. Number of and performance in UC-approved honors and advanced placement courses.
5. Identification by UC as being ranked in the top 9 percent of their high school class (eligibility in the local context, or ELC).
6. Quality of a student's senior-year program, as measured by the type and number of academic courses in progress or planned.
7. Quality of their academic performance relative to the educational opportunities available in their high school.
8. Outstanding performance in one or more academic subject areas.
9. Outstanding work in one or more special projects in any academic field of study.
10. Recent, marked improvement in academic performance, as demonstrated by academic GPA and the quality of coursework completed or in progress.
11. Special talents, achievements and awards in a particular field, such as visual and performing arts, communication or athletic endeavors; special skills, such as demonstrated written and oral proficiency in other languages; special interests, such as intensive study and exploration of other cultures; experiences that demonstrate unusual promise for leadership, such as significant community service or significant participation in student government; or other significant experiences or achievements that demonstrate the student's promise for contributing to the intellectual vitality of a campus.
12. Completion of special projects undertaken in the context of a student's high school curriculum or in conjunction with special school events, projects or programs.
13. Academic accomplishments in light of a student's life experiences and special circumstances.
14. Location of a student's secondary school and residence.

For Transfer Applicants

1. Completion of a specified pattern or number of courses that meet breadth or general education requirements.
2. Completion of a specified pattern or number of courses that provide continuity with upper division courses in the student's major, such as a UC Transfer Pathway, AA degree for transfer (offered at a CA community colleges only), or UC campus-specific major prerequisites.
3. Grade point average in all transferable courses-especially in a UC Transfer Pathway or in major prerequisites.
4. Participation in academically selective honors courses or programs.
5. Special talents, achievements and awards in a particular field, such as visual and performing arts, communication or athletic endeavors; special skills, such as demonstrated written and oral proficiency in other languages; special interests, such as intensive study and exploration of other cultures; experiences that demonstrate unusual promise for leadership, such as significant community service or significant participation in student government; or other significant experiences or achievements that demonstrate the student's promise for contributing to the intellectual vitality of a campus.
6. Completion of special projects undertaken in the context of the college curriculum or in conjunction with special school events, projects or programs.
7. Academic accomplishments in light of the student's life experiences and special circumstances.
8. Location of the student's college and residence.
9. Completion of a UC Transfer Pathway or an AA degree for transfer offered by a California community college.

Appendix 2: A-G Subject Requirements

Completion of the a-g subject requirements is one of the minimum academic standards that a student must attain to be considered for freshman admission at UC. To satisfy these requirements, applicants must complete a minimum of the following 15 college-preparatory courses with a letter grade of C or better:

- a. History 2 years
- b. English 4 years
- c. Mathematics 3 years
- d. Laboratory science 2 years
- e. Language other than English 2 years*

*or equivalent to the 2nd level of high school instruction

- f. Visual and performing arts 1 year
- g. College-preparatory elective 1 year

(chosen from the subjects listed above or another course approved by the university)