Process Review of Student Admissions

Report FY20 - #05
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Process Review of Student Admissions

Summary

Our process review of student admissions was included in our approved Fiscal Year (FY) 2020 Audit Plan. Admissions processes that ensure all qualified students have access to study at The University of Arizona (UArizona) support the Wildcat Journey strategic pillar's goals to drive student success and promote an environment of diversity and inclusion. This is our first audit of student admissions processes.

Background: Arizona Board of Regents (ABOR) policies establish the overall admissions standards for all three Arizona public universities. The policies dictate the minimum requirements for domestic resident and non-resident undergraduate admissions (see Policy 2-121). These applicants have assured admission if they graduated from an accredited high school, completed ABOR's coursework competencies, and had an unweighted grade point average of at least 3.0 for freshmen or 2.0 for transfers. UArizona is permitted to develop the graduate-level and international undergraduate admissions requirements (see Policy 2-120).

Various departments and colleges contribute to the administration of UArizona admissions processes. The Admissions Processing Unit of Enrollment Management (EM-APU) oversees the admission of both undergraduate freshmen and transfer students. EM-APU and Arizona Global partner to process and evaluate international students. The Graduate Admissions Unit of the Graduate College administers the evaluation of students seeking a graduate degree in conjunction with the colleges offering them.

Additionally, the Colleges of Medicine (Tucson and Phoenix), Veterinary Medicine, the R. Ken Coit College of Pharmacy, and the James E. Rogers College of Law independently oversee the admission of students to their graduate-level professional programs.[1] Finally, former UArizona students seeking readmission are primarily evaluated by the college offering their desired academic discipline.

Departments and colleges overseeing the admissions processes have disseminated their requirements and avenues for students to complete their applications on their websites. Also, there is significant use of third-party systems and services to facilitate application completion, processing, and recordkeeping. Given the significance, we plan to address the administration of these external relationships in a future audit. Institutional admissions information is reflected in the UAccess Student system.

Audit Objective: To review student admissions processes to ensure compliance with university policies and procedures.

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[1] The professional programs include Doctor of Medicine, Doctor of Veterinary Medicine, Doctor of Pharmacy, Juris Doctor Law, Master of Legal Studies, and Health Certificate Law Programs.

Process Review of Student Admissions

Scope: The scope included all UArizona admissions requirements and processes as of September 2021 and the students who were evaluated during the admission cycles for the Summer and Fall 2020 semesters.

Methodology: We applied the following procedures to assess audit risk and determine the nature of additional evidence needed to accomplish our objective for graduate, professional program, and undergraduate admissions:

- interviewing employees responsible for overseeing each admissions function to understand their requirements, processes, and challenges;

- reviewing websites that disseminate admissions requirements to ascertain the effectiveness of communication to interested students;

- assessing whether documents evidencing the evaluation guidelines and processing procedures are clear, complete, and reflect sound business practices;

- determining whether the requirements stipulated in institutional conflict of interest and information security policies are being addressed; and

- applying data analysis techniques over the entire population of student applicants in our scope to help identify riskier populations and determine the extent of sample review procedures.

After applying the above procedures, we determined that enough evidence was gathered for graduate and professional program admissions. For undergraduate admissions, we identified the need to apply further audit procedures as follows:

- determining whether ABOR policy requirements are being met;

- using our data analysis results to derive a risk-based sample of undergraduate students for detailed testing (see Exhibit);

- assessing administration over evaluation elements performed by colleges and external campuses;

- evaluating controls over access to the two electronic admissions systems;[2]

- determining the functionality of controls that ensure the accuracy of automated evaluation elements applied by the UAccess Student system;

- evaluating the segregation of duties between the admissions processing units and the Undergraduate Appeals Committee (Appeals Committee) to determine whether objectivity is ensured; and

- reviewing the effectiveness of post-evaluation verification procedures and controls.

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[2] The Admissions Module within UAccess Student is used for processing while the Slate system facilitates application completion and recordkeeping. Institutional protocols govern access to both systems.

Process Review of Student Admissions

Conclusions: Overall, our audit of graduate, professional program, and undergraduate admissions processes yielded favorable results. However, we identified two opportunities for improvement in the undergraduate area, as stated on page 4. Our conclusions for each process are as follows.

Graduate: The Graduate College effectively partners with colleges and has established a well-designed admissions process. We noted the existence of the following controls:

➢ The graduate programs within the colleges apply holistic evaluations that involve multiple parties and committees.

➢ The graduate programs enter decisions into an internally developed and hosted admissions processing system, GradApp. This system has controls that ensure the completeness of applications and evaluation records. There are also built-in protections against unwarranted access or changes.

➢ The Graduate College performs a final verification of the evaluation records before decisions are finalized. This process includes a review for credential integrity.

➢ The Graduate College communicates procedures while reinforcing duty segregation and confidentiality expectations through reference materials and required training programs.

Professional Programs: We determined that the five colleges offering the professional programs have admissions processes that reflect sound practices and risk mitigation. Key aspects are as follows:

➢ Evaluations involve various internal and external parties, which leads to inherent checks and balances and a higher degree of transparency.

➢ Colleges apply holistic evaluations to select the students who will be presented to their admissions committees for consideration.

➢ The committees have a mix of faculty, student, and at-large members and exclude the respective deans from membership.

➢ College admissions offices work with their committees to adopt the evaluation guidelines and committee member requirements.

➢ Employees, interview panelists, and committee members are required to sign conduct and confidentiality agreements.

➢ Access to admissions information and data integrity controls are addressed within the processes developed by each college.

➢ All five admissions offices are organizationally separate from donor development.

Process Review of Student Admissions

Undergraduate Admissions: We found that EM-APU and Arizona Global have implemented well-designed admissions processes, and accurate student applicant evaluations are generally being performed. The effort was invested to establish procedures and reference guides to document staff performance expectations. Efficiencies were also gained by automating academic credential comparisons to the admissions requirements in UAccess Student. As a result, they can process over 45,000 domestic and 5,000 international applications annually. We noted that the following aspects contribute to their effective control environment:

➢ Student applications go through multiple layers of staff evaluator, senior coordinator, and manager reviews before evaluations are finalized.

➢ Communication and monitoring procedures over the evaluation elements handled by colleges and external campuses exist.

➢ The evaluators verify automated evaluation results, and annual testing procedures ensure current programming.

➢ Post-evaluation verification procedures and controls are fully established over domestic students. For example, the evaluations for student athletes with borderline results are verified.

➢ Controls over the two undergraduate admissions systems include a user approval process that checks for the completion of information security training requirements, and access is restricted to the user's job duties.

➢ The admissions processing units are organizationally and physically separate from UArizona donor development functions.

Additionally, our review of the admissions requirements and evaluation guidelines for domestic students found that they align with ABOR policy. We also determined that the 10% limit on the admission of domestic students who do not meet ABOR's minimum high school coursework requirements is being met. EM-APU established a more holistic evaluation method called "Comprehensive Review" to evaluate those student applicants, and its design is consistent with ABOR policy.

Our audit identified two opportunities for improvement in the undergraduate admissions area affecting international post-evaluation controls and conflict of interest procedures. See pages 7 through 10 for further details and our recommendations.

During our review of sampled undergraduate students, we found some minor data entry inconsistencies that did not impact the evaluation outcomes. We verbally offered some suggestions to help promote data integrity moving forward.

Process Review of Student Admissions

According to the Institute of Internal Auditors International Professional Practices Framework, an organization is expected to establish and maintain effective risk management and control processes. These control processes are expected to ensure, among other things, that:

- the organization's strategic objectives are achieved;

- financial and operational information is reliable and possesses integrity;

- operations are performed efficiently and achieve established objectives;

- assets are safeguarded; and

- actions and decisions of the organization are in compliance with laws, regulations, and contracts.

Our assessment of these control objectives as they relate to the student admissions processes is presented on the following page.

Process Review of Student Admissions

General Control Objectives	Control Environment	Audit Result	
		No.	Page
Achievement of the Organization's Strategic Objectives			
• Strategic objectives are supported by admissions processes that ensure all qualified students have access to study.	Reasonable to Strong Controls in Place		
Reliability and Integrity of Financial and Operational Information	Not Applicable		
Effectiveness and Efficiency of Operations			
• Admissions requirements are effectively communicated.	Reasonable to Strong Controls in Place		
• Admissions evaluation guidelines and processing procedures reflect sound business and risk mitigation practices.	Opportunity for Improvement	1	7
• Controls ensure the accuracy of automated undergraduate evaluation elements.	Reasonable to Strong Controls in Place		
• Undergraduate students are not wrongfully admitted or denied.	Reasonable to Strong Controls in Place		
• Undergraduate evaluation elements performed by colleges and external campuses are monitored.	Reasonable to Strong Controls in Place		
• Undergraduate appeals process duties are segregated to ensure objectivity.	Reasonable to Strong Controls in Place		
• Undergraduate post-evaluation verification procedures and controls are effective.	Opportunity for Improvement	1	7
Safeguarding of Assets			
• Access to admissions systems is controlled and monitored.	Reasonable to Strong Controls in Place		
Compliance with Laws and Regulations			
• ABOR policy requirements are met for undergraduate admissions.	Reasonable to Strong Controls in Place		
• Admissions processes address compliance with institutional conflict of interest policy.	Opportunity for Improvement	2	9
• Admissions processes address compliance with institutional information security requirements.	Reasonable to Strong Controls in Place		

We appreciate the assistance of representatives from Enrollment Management, Arizona Global, the Graduate College, and colleges overseeing the professional programs during the audit.

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Audit Results, Recommendations, and Responses

1. Evaluation controls and procedures over international undergraduate students can be improved.

Condition: We noted the following during our audit procedures over the international admissions process:

1. The evaluation guideline and procedure documents had multiple areas that were incomplete, unclear, or outdated.

2. Post-evaluation verification procedures and controls have not been developed for international evaluations. For example, controls to ensure colleges completed reviews of readmitted students do not exist. Also, verifications of student athletes with borderline evaluation results do not occur. However, we noted secondary review layers within the evaluation process mitigate the risk of significant errors and incorrect outcomes.

Criteria:

- Sound business practices over management's maintenance of staff resource documents advise they be current, complete, and lead to the consistent application of guidelines and procedures.

- Admissions risk mitigation practices advise that procedures to verify evaluation results, processes to monitor for the quality of staff work, and controls over the evaluation of risker student applicant populations exist.

Cause: EM-APU and Arizona Global management advised the auditor that limited resources in the International Admissions Processing Unit impacted the ability to update resources and implement post-evaluation controls.

Effect: There is potential exposure to the risks associated with erroneous evaluation outcomes, ineffective staff training, and the inability to maintain business continuity.

Recommendations: Ensure that the Associate Director, International Admissions Processing addresses the following:

1. Update the evaluation resource documents to ensure they are complete, current, and reflective of the guidelines and procedures staff are expected to follow. Include a process to periodically review them to ensure they remain current.

2. Establish post-evaluation verification procedures and controls. Evaluate the costs versus the benefits when selecting the controls to implement and address risker student populations. Specify how errors and inconsistencies are identified, assessed, corrected, and communicated to staff.

Management Response: Target Implementation Date: December 1, 2022.

1. As recommended by Internal Audit, our unit will be updating all relevant resource documents to ensure that they are accurate, current, and reflective of guidelines and procedures that our staff is expected to follow. Along with this is the expectation of periodic review and update of the documents as deemed necessary.

2. The International Admissions Processing Unit will establish post-evaluation verification procedures and controls as highlighted by the audit's recommendations. Due to current staffing challenges, we intend to make use of Enrollment Management's domestic post-evaluation and verification resources to support our efforts. We intend to specify the ways in which errors and inconsistencies are to be identified, corrected, and addressed with the staff.

To this end, we've begun updating our resource documentation at the onset of having received the audit recommendations. In addition, we started the process of identifying the post-evaluation procedures and controls to establish.

2. Conflict of interest procedures are not documented.

Condition: Conflict of interest (COI) procedures have not been documented to formalize responsibilities and ensure the related institutional policies are followed. EM-APU management has relied on verbal communications to reinforce the need to disclose potential COI relationships.

Criteria: According to the *Conflicts of Interest & Commitment Policy (Interim):*

- *Part 1* states, "All Covered Individuals must …timely disclose through the University's eDisclosure system…"

- *Part 2* states, "All Covered Individuals must… Adhere to any requirements deemed necessary by… the University Employee's supervisor to manage or eliminate conflicts."

Cause: EM-APU management advised the auditor that they have not identified a need to document their procedures based on operating experience and the infrequency of known occurrences.

Effect: There is potential exposure to the risks associated with unidentified COI relationships influencing admissions evaluations and noncompliance with institutional policy.

Recommendations:

1. Document an internal COI policy to memorialize management's informal procedures. Include the following elements to help deter the potential risks:
   a. specify how possible and known conflicts are evaluated and mitigated;
   b. methods for management to communicate the requirements and confirm understanding;
   c. avenues for employees and Appeals Committee members to report their conflicting relationships to management; and
   d. monitoring for any undisclosed COI relationships.

2. Consult with the Office for Responsible Outside Interests to ensure internal COI procedures comply with institutional policy expectations, documentation practices, and eDisclosure system reporting requirements.

Management Responses:

1. Implemented Prior to Report Issuance.

   We documented and incorporated our internal COI policy into the Admissions Processing Unit (APU) Employee Handbook. The handbook is updated annually and shared with APU staff and Appeals Committee members. The policy and the accompanying Undergraduate Admissions Applicant Evaluation Expectations Agreement include the following:

   ➤ The policy and agreement specify how possible and known conflicts are evaluated and mitigated.

   ➤ APU staff and Appeals Committee members are directed to report potential conflicting relationships to the APU Director or the Appeals Committee co-chairs.

   ➤ Communication of the policy requirements occurs on an annual basis for all APU staff members, upon employment of new staff members (then annually after that), and upon annual participation on the Admissions Appeals Committee. All must review the policy, report any known potential conflicts, and sign the agreement.

   ➤ The policy outlines expectations for any undisclosed COI relationships and the agreement places responsibility on the individual to report potential conflicts. The APU Director oversees monitoring for possible undisclosed conflicts with the assistance of APU managers.

2. Target Implementation Date: May 15, 2022.

   The APU Director will consult with the Office for Responsible Outside Interests to ensure internal COI procedures comply with institutional policy expectations, documentation, practices, and eDisclosure system reporting requirements. This meeting will be scheduled no later than May 15, 2022.

Exhibit

According to the data EM-APU provided for the audit, around 53,000[3] undergraduate applications were evaluated during the Summer and Fall 2020 semesters. Of the total, 47,000 were domestic and 6,000 were international. Based on our analysis of the data, we found:

- 26% were determined to be admissible and enrolled;
- 47% were evaluated as admissible, but did not enroll;
- 4% resulted in a decision to deny admission; and
- 23% withdrew their application during the evaluation process.

We elected to focus audit sampling on admissible students who enrolled and the denied students. We primarily compared the academic credential data to the evaluation outcomes for all students within these two populations. We analyzed the results to derive a risk-based sample of students with an outcome that did not appear to match their credentials. Our testing of the sample considered the following factors:

- completeness of applicant information in the supporting records and whether the information supports the evaluation outcome;
- whether students were evaluated against the correct requirements for their type;
- the evaluator's verification of automated results from UAccess Student;
- verification of evaluation elements applied by colleges and external campuses;
- application of secondary reviews and post-evaluation verification controls; and
- indications of possible conflicts of interest or undue influences.

A summary of our sampled undergraduate students is as follows:

Applicant Type	Admitted & Enrolled			Denied		
	Population	Sampled	%	Population	Sampled	%
Domestic Freshmen	8,176	153	2%	1,331	58	4%
Domestic Transfers	3,694	174	5%	162	23	14%
Domestic Readmitted	717	29	4%	21	6	29%
Domestic Athletes	126	25	20%	0	N/A	N/A
International Freshmen	618	91	15%	346	35	10%
International transfers	479	96	20%	24	13	54%
International Readmitted	12	8	67%	2	2	100%
International Athletes	22	15	68%	1	0	N/A
Totals:	13,844	591	4%	1,887	137	7%

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[3] Breakdown of applications by type: 44,000 freshmen, 8,100 transfers, and 900 readmitted.

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