

Admissions Internal Audit Report
Project # 2019-62
October 7, 2019

Reviewed by:


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This engagement was conducted in accordance with The Institute of Internal Auditors' International Standards for the Professional Practice of Internal Auditing and with Government Auditing Standards.

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Background:

In response to recent nationwide issues involving third parties exploiting vulnerabilities in college admissions processes, specifically related to athletics, the UTSA President and Interim Vice President for Strategic Enrollment requested Internal Audit assess the undergraduate and athletic admission controls in place to reduce its exposure to third party interference. Accordingly, the UTSA Internal Audit Office amended its fiscal year 2018-2019 audit plan to include an audit of undergraduate admissions.

Objectives:

The objective of the audit was to ensure UTSA is admitting students based on established criteria and guidelines to include the identification of additional protocols, process improvements and streamlining opportunities. The scope was limited to undergraduate freshmen, transfers, and special admits. The Graduate and College specific processes were not included.

Conclusion:

We identified several opportunities to strengthen existing processes to ensure all students are admitted based on published criteria and to reduce the opportunities for potential admissions fraud.

In addition to the detailed observations included in this report, management should consider the use of data analytics to red-flag admissions decisions made outside of normal decision sequences; review student admissions where SAT/ACT scores that are disproportionate to GPA; and research the use of the Athletics Module in BANNER to aid in the monitoring of athlete performance and compliance.

Recommendations:

- Unsuitable application of Student Success Predictive Model in lieu of Holistic Review Process (Priority)
- Holistic Review Process was not consistently followed (High)
- Lack of supporting documentation for Student Athlete admission decisions (High)
- Inaccurate Application Date uploaded from the Apply Texas System (High)
- Usage of Decision Codes in BANNER not clearly defined (High)
- Inaccurate Student Athlete data in BANNER (Medium)
- Data in supporting documentation did not match BANNER records/data (Medium)
- Critical electronic repeatable processes not automated (Medium)
- Excessive access to Admissions Decisions and Admissions Rules Forms (Medium)

A Priority Finding is defined as *“an issue identified by an internal audit that, if not addressed timely, could directly impact achievement of a strategic or important operational objective of a UT institution or the UT System as a whole.”* Non-Priority Findings are ranked as High, Medium, or Low, with the level of significance based on an

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assessment of applicable Qualitative, Operational Control, and Quantitative risk factors and probability of a negative outcome occurring if the risk is not adequately mitigated. This audit resulted in one Priority, four High and four Medium-level findings.

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Audit Details

Ensure UTSA is admitting students based on established criteria and guidelines to include the identification of additional protocols, process improvements and streamlining opportunities.

Student Success Predictive Model

UTSA Institutional Intelligence created a Student Success Model to generate probability scores for admitted freshman students based on a variety of student-specific attributes and rank them according to their likelihood (probability) of being in good academic standing at the end of their first semester. The model was designed to aid in the early identification of students who are at risk of ending their first semester in academic probation so that support and assistance can be provided to ensure their success at the university.

Observation:	<p>The Student Success Predictive Model was utilized to determine admittance of freshman students that did not meet the criteria for guaranteed (automatic) admissions and were flagged for Holistic Committee review. Student-specific attributes, two of which were unsuitable for making admissions decisions, were utilized to calculate the probability scores. Additionally the use of this model in making admission decisions did not afford all holistic review qualifying applicants, those with probability scores less than .68, the privilege of the published Holistic Committee Review process which encompasses the review of all application information submitted including, but not limited to, essays, extracurricular activities and extenuating circumstances.</p> <p>The model was utilized in the following manner:</p>
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	Probability Score/Range	Admit Status	Comment
	> .72	Admit to UTSA	Students are admitted directly to UTSA
	.69 - .72	Holistic Review	Files are reviewed by experienced admissions counselors for potential holistic review – some students will be admitted directly into UTSA, others will be offered LEAD
	.66 – 68	Offer LEAD	Students are offered the LEAD Summer Bridge program and must complete 6 hours prior to the Fall term
	< .66	Offer Alamo On-Track	Students are initially denied admissions to UTSA but offered the Alamo On-Track program, with built in mechanism to transfer to UTSA
Risk Level:	The use of this predictive model for admission is considered PRIORITY risk due to the increased perception of disparate admissions decisions and scrutiny by regulators.		
Management’s Response:	The Holistic Review Process has been reinstated. Remediative actions have been taken to mitigate any potential impacts of the unsuitable application of the predictive model on prior admissions. The Student Success Predictive Model also has been refined and will be used for its intended purpose, in predicting student success and to identify those who might benefit from additional supports to increase success.		
Responsible Person:	Senior Vice Provost for Strategic Enrollment		
Implementation Date:	Complete		

Holistic Review

Freshmen students that do not meet the standards for guaranteed admissions are eligible for a committee review according to the UTSA published criteria. A Holistic Review Committee is a group of staff appointed for the purpose of reviewing the student record to ensure the student is eligible for

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freshmen admission. The criteria specified includes the following processes:

1. The review would be completed by a minimum of two reviewers.
2. A third review would be performed if the first two reviewers disagree on the admissions decision.
3. All reviewed records entered in the online review form should have comments providing insight on how the decision was derived.

Observation:	The established holistic review process was not being consistently followed as evidenced by following for Fall 2018 and Spring 2019 data: <ul style="list-style-type: none"> • 15.28% were admitted with single review. • 69.2% (fall) and 35.3% (spring) were admitted directly in BANNER forms by a staff person vs service account indicating that the online holistic review process and documentation form was not utilized. • 20.99% were missing “comments” justifying the decision as required via the online form.
Risk Level:	Bypassing designed processes and controls is considered HIGH risk due the increased likelihood of admissions decisions being inconsistent and the inability to produce documentation to support the decisions made. Furthermore, not following publicly published policy and procedures could result in negative perception by regulators resulting in increased scrutiny and the potential for adverse questioning of admissions decisions.
Management’s Response:	Policies and procedures will be reviewed, revised and reiterated prior to the first committee files are released for fall 2020. The decision code option 22 allowing for “Individual Review” will be eliminated from BANNER to ensure the holistic review process is followed. All committee members will be trained on the current processes, the need to meet decision turnaround times, and the requirement for making appropriate notes/comments.
Responsible Person:	Eric Cooper, Associate Vice Provost, Enrollment
Implementation Date:	November 30, 2020

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Documentation

In the 2018-19 UTSA Information Bulletin regarding First-Time Freshman, “Applicants ranking in the second, third, or fourth quartile with the required minimum SAT or ACT score and applicants from a home school or unaccredited high school will be considered for admission through Committee Review.”

Per the UTSA Records Retention Schedule (Agency Item - #6.2.171) – **“Student Athlete Education Records** – Including student-athlete statement. Results of drug test, high school & all college transcripts, precollege test scores & related information and correspondence, records concerning financial aid, other documents obtained pertaining to NCAA eligibility.” – Retained after closed, terminated, completed, expired or settled +10 years (Subject to NCAA investigative review).

Observation:	For our specific sample testing of student athletes, we identified deficiencies in the supporting documentation, such as, missing or incomplete transcripts, test scores, signatures on forms, and admission decisions justification comments along with the holistic review processes not being followed. Additionally, documentation was difficult to locate due to multiple repositories, flaws in indexing, and inconsistent documentation requirements.
Risk Level:	The lack of documentation to support admissions decisions for athletes is considered HIGH risk due to the increased probability of litigation or negative media exposure within the community, particularly within a class of people.
Management’s Response:	A new committee review process for athletes was implemented May 2019. Athletes who do not meet direct admission are reviewed holistically by two director level staff, scored on an Excel spreadsheet and those documents, along with the supporting comments, are attached to each students’ BANNER records. A third committee member, the AVP for Enrollment Operations, will vote in the case of a split decision. An electronic process will be researched for implementation at a later date.
Responsible Person:	Eric Cooper, Associate Vice Provost, Enrollment
Implementation Date:	November 30, 2019

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Application Date | Best business practices should ensure that data included in Banner utilized for tracking application dates is accurate and verifiable against official Apply Texas application date.

Observation:	The “application date” entered into BANNER is not representative of the ApplyTexas “application date”; rather, it is the date the application was uploaded to BANNER. As a result any analysis or management decisions being made regarding the date applicants submit applications is flawed if the application upload process is not run and the application received on the same date it was submitted to ApplyTexas. To compound this data integrity issue, the admissions staff and management were not aware of this discrepancy and repeatedly indicated this information was the actual date the application was submitted to ApplyTexas.
Risk Level:	Not entering the correct application date in BANNER to represent the actual application date within “ApplyTexas” is HIGH risk, because it increases the probability of corrupt institutional and external reporting, as well as effective managerial decision-making.
Management’s Response:	The upload process/code will be updated to load the correct application date from ApplyTexas.
Responsible Person:	Eric Cooper, Associate Vice Provost, Enrollment
Implementation Date:	November 30, 2019

Decision Codes | Best business practices should ensure data included in Banner utilized to track application decisions at each stage of the admission process would be backed by policy or procedure delineating the proper usage of each decision code. Additionally, inactive decision codes should be removed from the list included in BANNER to avoid improper utilization.

Observation:	The Freshman admissions process is not clearly documented and architected to succinctly indicate when each BANNER decision code is to be utilized and attributes codes established to track special admit cohort students through their academic career.
Risk Level:	Not having the Freshman admissions process clearly documented and architected to succinctly indicate when each

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	BANNER decision codes should be utilized along with the use of attribute codes is HIGH risk due increased probability of inaccurate management decisions and cost over-runs.
Management's Response:	Attributes codes have been created for the identified decision groups: Summer LEAD (LEAD), the Alamo Runners (ARUN) and the OnTrack (TRAC) program. Processes and associated documentation regarding usage of the new attributes will be finalized by November 30, 2019.
Responsible Person:	Eric Cooper, Associate Vice Provost, Enrollment
Implementation Date:	November 30, 2019

SGASPRT

Best practice would ensure the BANNER athletic compliance processing functionality be utilized to track athletic status and academic eligibility to support the National Collegiate Athletic Association (NCAA) athletic compliance requirements from admission through graduation. The BANNER Athletic Compliance Form (SGASPRT) and corresponding table (SGASPRT) are used by the institution to assign sport codes, status, athletic eligibility, academic eligibility, and the athletic aid information by term for each athlete.

Observation:	<p>The data in the BANNER Athletic Compliance Form (SGASPRT) Table used to track athletes and their relative eligibility status is inaccurate. The BANNER Athletic Compliance Form (SGASPRT) and corresponding table (SGASPRT) are used by the institution to assign sport codes, status, athletic eligibility, academic eligibility, and the athletic aid information by term for each athlete. A comparison of athletes identified in the SGASPRT table as active athletes "AC" to those reported on NCAA rosters revealed the following discrepancies:</p> <ol style="list-style-type: none"> 1. 318 listed as active in SGASPRT that are not on the NCAA Rosters <ul style="list-style-type: none"> • 222, previous athletes that have already graduated • 80, current students flagged as active athletes not on NCAA roster (i.e. team managers, trainers, etc.)
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	<ul style="list-style-type: none"> • 16, are in BANNER, but never registered or attended classes
Risk Level:	The inability to accurately track "all" active athletes within the student record system throughout their tenure at the institution is considered a MEDIUM risk because it increases the probability NCAA compliance monitoring controls and automated processes for management of athletes will be not effective as that they are not applied to the entire population.
Management's Response:	The data cleanup is completed and new manual maintenance processes have been implemented to ensure data integrity is maintained. Athletics Compliance is responsible for maintaining data within SGASPRT with reviews by Athletics Certification. Long-term, the potential for automation will be researched and implemented if it will reduce the manual administrative burden (e.g. automatically updating active code to graduate in SGASPRT when an athlete graduates).
Responsible Person:	Eric Cooper, Associate Vice Provost, Enrollment Stephen Lutz, Assistant Director of Athletic Certification.
Implementation Date:	November 30, 2019

Data Integrity

Best business practices should ensure data included in Banner utilized to make the admissions decisions (accept, deny, OnTrac, etc.) is accurate and verifiable against official documents received from outside parties.

Observation:	There are various student records in Banner for which the student was admitted, and the supporting documentation did not match the information manually entered in BANNER. The majority were discrepancies in high school rank, which is a key variable in UTSA's admissions criteria.
Risk Level:	BANNER student records not matching supporting student documentation is deemed a MEDIUM risk due the increased probability of inaccurate admissions decisions.
Management's Response:	<ol style="list-style-type: none"> 1. The Banner ID examples from the audit will be reviewed to determine the cause of the discrepant information. 2. Training of new One Stop staff will be reviewed, revised as necessary and immediately re-introduced to the One Stop staff and admissions processors.

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	3. Admissions processing managers and One Stop managers will implement a quality control process for admissions paperwork that will broadly review adherence to procedures. The outcomes of the QC process also will lead training efforts and help guide staff for performance evaluations.
Responsible Person:	Eric Cooper, Associate Vice Provost, Enrollment
Implementation Date:	November 30, 2019

Manual Processing

As a best business practice, critical electronic tasks that are standardized and repeatable should be automated; removing the need for human interaction, and preventing a reliance on a single employee. Dependence on employee attendance for the importing of application data from Apply Texas particularly during peak times in admissions does not support longevity or sustainability of admissions business processes.

Observation:	There are three processes/scripts: ad_189_prep_ug, ad_189_post_ug, and AD_TXAPP_END; used to upload and eventually purge future student applications from ApplyTexas. These tasks are executed manually by an individual employee, creating a dependency on the presence of this individual to ensure the processes are executed daily.
Risk Level:	The lack of automation and reliance upon human intervention to process applications is considered MEDIUM risk due to the probability the process will not be executed if assigned personnel are unavailable
Management's Response:	A Business Analyst with admissions experience was hired to work with the Office of Information Technology to automate the ApplyTexas download process and other manual processes within the Admissions, Enrollment and Financial Aid areas.
Responsible Person:	Eric Cooper, Associate Vice Provost, Enrollment
Implementation Date:	November 30, 2019

Excessive Access

Two admissions forms were identified as critical to processing admissions SAADCSN – Admissions Decision Rules Form and SAADCRV-Admissions Decisions Form. Access to these forms

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should be limited to Admissions staff responsible for establishing the processing rules and making individual admissions decisions. The following were identified as admissions personnel needing “modify” access to perform assigned admissions job duties:

SAADCSN: Admissions Decision Rules Form (SAADCSN). Use this form to enter criteria for system-calculated admission decisions.

Users requiring modify access:

- Associate Director of Undergraduate Admissions
- Admissions Systems Analyst

SAADCRV: Admissions Decision Form (SAADCRV). This form is used to admit an applicant and create a learner record in BANNER.

Users requiring modify access:

- Director of Undergraduate Admission
- Associate Director of Undergraduate Admissions
- Admissions Counselors
- Enrollment Services Associates 1,2,3

Observation:	<p>Modify access to the Admissions Decision Rules Form (SAADCSN) and Admissions Decision Form (SAADCRV), based on criteria is not limited to admissions staff members that utilize and modify admissions decisions as part of their daily/routine job duties:</p> <ul style="list-style-type: none"> • Ninety-two individuals had modify access to SAADCRV. Of these 80% (74) did not meet the criteria provided and should have only had query access. • Twenty-seven individuals had modify access to SAADCSN. Of these 70% (19) did not meet the criteria provided and should have only had query access.
Risk Level:	<p>The excessive access to modify application processing configurations/rules and to input admissions decisions directly into the system by non-admissions personnel is deemed MEDIUM risk due to increased probability of process failure and bypassing of established holistic review procedures and criteria.</p>
Management’s Response:	<p>The new Associate Registrar for Admissions Processing and Enrollment Data Management has been assigned as the Admissions Data Owner responsible for approving and monitoring access to admissions forms within BANNER.</p>

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	Inappropriate access to the two forms/screens noted in this review will be removed no later than November 30, 2019. Long-term a new access class/roll structure has been designed for admissions and will be implemented during fall 2019 and monitored by the Data Owner and the Enrollment Management Compliance team.
Responsible Person:	Eric Cooper, Associate Vice Provost, Enrollment
Implementation Date:	November 30, 2019