19-300F Admissions Process

We have completed our audit of the admissions process. This audit was performed at the request of the UTHealth Audit Committee and was conducted in accordance with the *International Standards for the Professional Practice of Internal Auditing.*

BACKGROUND

McGovern Medical School (MMS)

Degrees offered at MMS include Doctor of Medicine (MD) and Master of Science (MS) in Clinical Research. Dual degree programs in collaboration with other UTHealth schools include MD/Doctor of Philosophy (PhD), MD/Master of Public Health (MPH), MD/Oral & Maxillofacial Surgery (OMFS), and MD/MS in Biomedical Informatics. Applicants applying to the dual degree programs must be admitted separately by each school and fulfill the individual diploma requirements for each program in order to receive the respective degree.

School of Dentistry (SOD)

Degrees offered at SOD include Doctor of Dental Surgery (DDS), Bachelor of Science in Dental Hygiene, Master of Science in Dentistry (MSD), or certificates in specialized Advanced Education Programs. Specialized Advanced Education Programs include Advanced Education in General Dentistry (AEGD), Endodontics, General Practice Residency (GPR), Oral & Maxillofacial Surgery (4 year or 6 year), Orthodontics, Pediatric Dentistry, Periodontics, and Prosthodontics.

Cizik School of Nursing (CSON)

Degrees offered at CSON include a Bachelor of Science in Nursing (BSN) for Pacesetter, three Registered Nurse (RN) bridge programs, eight Master of Science in Nursing (MSN) and Post-Master programs, four Doctor of Nursing Practice (DNP), Doctor of Philosophy (PhD), BSN-DNP Nurse Anesthesia, and BSN-DNP Nurse Practitioner.

School of Public Health (SPH)

Degrees offered at SPH include MS, MPH, Doctor of Public Health (DrPH), and PhD. Dual degree programs in collaboration with other UTHealth schools include DDS/MPH, MD/MPH, MS in Biomedical Informatics/MPH, and PhD in Biomedical Informatics/MPH. Applicants applying to the dual degree programs must be admitted separately by each school and fulfill the individual diploma requirements for each program in order to receive the respective degree.

School of Biomedical Informatics (SBMI)

Degrees offered at SBMI include MS in Biomedical Informatics, PhD in Biomedical Informatics, and Doctorate in Health Informatics (DHI). Dual degree programs in collaboration with other UTHealth schools include MS/MPH, PhD/MPH, and MD/MS. Applicants applying to the dual degree programs must be admitted separately by each school and fulfill the individual diploma requirements for each program in order to receive the respective degree.

<u>Graduate School of Biomedical Sciences (GSBS)</u>

GSBS is a unique partnership between The University of Texas MD Anderson Cancer Center (MD Anderson) and UTHealth. Degrees offered at GSBS included MS and PhD in Biomedical Sciences. Specialized MS programs for Genetic Counseling and Medical Physics are also offered.

<u>MMS and GSBS</u>

The Medical Scientist Training Program (MSTP), also known as the MD/PhD program, is a dual degree program of MMS and GSBS.

OBJECTIVES

The objective of this audit was to determine whether controls around the admissions processes are adequate and functioning as intended.

SCOPE PERIOD

The scope period was for the most recent completed recruitment period as of June 2019 for each of the programs selected for review.

METHODOLOGY

Comprehensive risk assessments were performed for the following programs: MD program at MMS, DDS program at SOD, all programs at SPH, all programs at SBMI, all programs at GSBS (excluding the two specialized MS programs), and the MSTP. For each of these programs, the following procedures were performed:
- Reviewed policies and/or procedures related to the admissions process to determine whether they are clearly defined and documented. This included a review of documented procedures, criteria for admission, and conflict of interest.
- Reviewed processes related to training (if any) and relevant background of those involved in the evaluation of applicants for admission.
- Reviewed processes related to verification of eligibility to ensure applicants met the minimum admission requirements and/or evidence that other non-academic factors were considered.
- Reviewed records retention to ensure sufficient details exist to support admission decisions and assessed compliance with the Records Retention Schedule.
- Reviewed controls over user access to the application system and/or spreadsheets used in the admissions process for appropriateness.

Given the wide range of other programs offered at the SOD and CSON, a limited risk assessment was performed:
- For dental hygiene and the eight Advanced Education Programs offered at SOD, information was gathered from the program directors related to policy and procedures, the number of applicants who applied to the program, and the number of applicants who were accepted to the program. Based on the information provided, the following programs were selected for further review based on assessed risks: Oral & Maxillofacial Surgery, Orthodontics, and Endodontics.
- For all programs offered at CSON, information was gathered from the Executive Director of Student Affairs in conjunction with each program director, including related policy and procedures, the number of applicants who applied to the program, and the number of applicants who were accepted to the program. Based on the information provided, the following programs were selected for further review based on assessed risks: Pacesetter BSN, MSN Adult/Gerontology Acute Care Nurse Practitioner, BSN-DNP Nurse Anesthesia, and DNP.

19-300F Admissions Process

The table below summarizes the statistics provided for information purposes to put the number of applicants and the number of admission offers into perspective for each of the programs selected for further review.

School Degree Program/Recruitment Cycle	Applicants Applied	Applicants Offered Admission	Type of Review Performed
MMS			
• MD (Fall 2019)	5,364	237	Sample of 10
SOD			
• DDS (Fall 2019)	954	106	Sample of 10
• Oral & Maxillofacial Surgery (2018-2019)	227	6	Data Analysis
• Orthodontics (Fall 2019)	254	6	Data Analysis
• Endodontics (Fall 2020)	205	5	Data Analysis
CSON			
• Pacesetter BSN (Fall 2019)	984	167	Sample of 10
• BSN-DNP Nurse Anesthesia (Summer 2019)	2108	22	Sample of 10
• MSN Adult/Gerontology Acute Care Nurse Practitioner (Summer 2019)	48	27	Sample of 10
• DNP (Fall 2019)	105	59	Sample of 10
SPH			
• MPH/PhD/DrPH (Fall 2019)	1,187	778	Sample of 10
SBMI			
• Non-Degree/Certificate/MS/DHI/PhD (Fall 2019)	165	132	Data Analysis
GSBS			
• MS/PhD (Fall 2019)	737	144	Sample of 10
MMS and GSBS			
• MTSP (2018-2019)	203	7	Sample of 10

AUDIT RESULTS

A&AS identified the following areas for improvement:

- A conflict of interest policy and/or procedure for admissions personnel involved in the evaluation of applicants has not been defined, formalized, and/or acknowledged annually.
- Record keeping as it pertains to the admissions process has not been formalized, which has resulted in inconsistencies around the types of records retained and retention periods across the different programs at each school.
- Follow up processes for assigned reviewers in the MSTP program have not been formalized. Additionally, *Faculty Interview Report* forms were not consistently used for all applicants interviewed for the program.

NUMBER OF PRIORITY FINDINGS REPORTED TO UT SYSTEM
None

We would like to thank the staff and management involved in admissions and student affairs within each of the schools at UTHealth who assisted us during our review.

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Daniel G. Sherman, MBA, CPA, CIA
Associate Vice President & Chief Audit Officer

MAPPING TO FY 2019 RISK ASSESSMENT

Risk (Rating)	Not Applicable

DATA ANALYTICS UTILIZED

Data Analytic #1	None

AUDITING & ADVISORY SERVICES ENGAGEMENT TEAM

AVP/CAO	Daniel G. Sherman, MBA, CPA, CIA
Auditor Assigned	Kathy Tran, CIA, CFE
End of Fieldwork Date	January 23, 2020
Issue Date	March 12, 2020

Copies to:

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Issue #1	HOOP 20 *Conflict of Interest, Conflict of Commitment and Outside Activities* (HOOP 20) define conflict of interest as: "An outside activity or financial interest (or your family member's activity or interest) that could directly or significantly affect the performance of your UTHealth responsibilities, with the potential to: 1) influence, or even appear to influence, your conduct or decisions in your job; 2) impair your independence of judgment in your job; and 3) induce you to inappropriately disclose confidential or proprietary information that you have obtained in your job. Conflicts of interest are generally issues of financial or personal gain." A&AS noted HOOP 20 does not provide specific guidance or requirements for employees who participate in or influence the review of applications for admission. While the schools have some avenues for addressing conflicts of interest for admissions, formalized policies and procedures have not been established. We noted the following issues: CSON/GSBS/SBMI/SOD/SPH There are no formal conflict of interest policy and/or procedures for those involved in the evaluation of applications for admission, and a written disclosure form is not required for CSON, GSBS, SBMI, SOD and SPH. Subsequent to our testwork, SPH added conflict of interest procedures to their *Admission Process* guidelines. MMS and GSBS – MSTP Program There is a formal conflict of interest policy and/or procedures for those involved in the evaluation of applications for admission; however, conflicts of interest are communicated verbally and members with a conflict of interest are recused during the evaluation of the applicant.
Recommendation #1	We recommend the schools work with the Office of Legal Affairs to review current conflict of interest practices related to individuals involved in the admission process. The review should consider, but not be limited to, the following: • Formalizing conflict of interest policies and/or procedures for the schools that currently do not have one, including covering all employees who are involved in the evaluation of applicants for admission. • Requiring documented annual conflict of interest disclosures for employees involved in the evaluation of applicants for admission, including an attestation that they are not aware of any attempt to improperly influence an admission decision.
Rating	Medium
Management Response	Management from each school will work with the Office of Legal Affairs to develop a formal Conflict of Interest policy including annual disclosure

	statement. The Conflict of Interest policy will be owned by each school with the Office of Legal Affairs providing legal guidance.
Responsible Party	The Office of Admissions and Student Affairs or equivalent from each school, working with the Office of Legal Affairs
Implementation Date	October 1, 2020

Issue #2	The approved Records Retention Schedule for UT System requires the following:
	- Student applications to medical and dental schools to be retained for FE+10 where FE is fiscal year end. - Status reports and applicants material for admission to medical and dental schools to be retained for US where US is "Until Superseded." The approved Records Retention Schedules for GSBS, MMS, SBMI, SOD, and SPH requires the following: - Applicant records to be retained for AC+2 where AC is "after end of affected semester." This records series typically includes, but is not limited to, records which reference a person/applicant during the period of application, acceptance, and admission to the University, prior to actual enrollment in classes. Applicant records become student records after the student has been admitted, enrolled in, and been in attendance at the University. - Student admission records to be retained for AC+5 where AC is "after graduation or date of last attendance." This records series typically includes, but is not limited to, application, letters of recommendation, entrance exam, results/scores, advanced placement results/scores, requests to update application, transcripts (high school and college), recruitment records, military records, acceptance letter, and correspondence. In addition, the following was noted: - The approved Records Retention Schedule for CSON does not have a records retention requirement for applicant records, only student admission records. - The approved Records Retention Schedule for GSBS also requires standing admissions committees records to be retained permanently based on administrative value. A&AS reviewed the record keeping procedures at each school and noted the following inconsistencies in the records retained and the retention period: - CSON records are retained at the program level and varies by program. Some programs retain all records indefinitely, while others discard certain records once the decision is finalized. - GSBS records are retained indefinitely, with the exception of the paper score sheets from the Admissions Committee meeting, which are discarded after five years. - MMS records are retained indefinitely. - MSTP records are retained indefinitely. - SBMI records are retained in the Hobson's Radius for a minimum of seven years before they are discarded. Since the implementation in February 2017, no records have been discarded. - Some SOD records for the DDS program are retained indefinitely, while others are discarded. - SPH records are retained indefinitely.

Recommendation #2	We recommend the schools work with the Office of Legal Affairs to review the current recordkeeping practices related to applicant and student records for admissions. The review should consider, but not be limited to, the following: - Identifying the types of records involved in the admissions process. - Determining whether the records should be retained or discarded. If the records should be retained, the retention period should be in accordance with approved Records Retention Schedule. - Establishing the minimum documentation requirements that sufficiently support the admissions decisions, and ensuring they are consistently followed.
Rating	Medium
Management Response	Management from each school will work with the Office of Legal Affairs to develop formal recordkeeping practices for applicant and student admission records. The recordkeeping procedures will be owned by each school with the Office of Legal Affairs providing legal guidance.
Responsible Party	The Office of Admissions and Student Affairs or equivalent from each school, working with the Office of Legal Affairs
Implementation Date	October 1, 2020

Issue #3	Faculty members from UTHealth and MD Anderson are responsible for interviewing MSTP applicants. For each applicant interviewed, *MSTP Admissions Protocol* requires interviewers to complete the *Faculty Interview Report* on a scale from 5 (high accept) to 0 (reject) and return the completed form to the Program Manager to retain with the applicant's file. A&AS selected a sample of 10 applicants during the most recent recruitment cycle (2018-2019), reviewed supporting documentation, and noted the following issues: • There is no formalized process to follow up with assigned reviewers once applications are sent to them for review. • There is no formalized process to follow up with assigned interviewers to obtain the *Faculty Interview Report* for each applicant interviewed. • There are inconsistencies in the interview report form and scoring used for each applicant. One applicant's file showed interviewers completed the School of Medicine's *Applicant Interview Report* instead of the required *Faculty Interview Report*. The *Applicant Interview Report* scores applicants from 1 (serious concerns) to 5 (exceptional candidate), while the *Faculty Interview Report* scores applicant from 0 (do not accept) to 6 (high accept). The average interview score is one of the factors considered in the admission decision.
Recommendation #3	We recommend MSTP management develop and implement formal procedures for: • Following up with assigned reviewers once applications are sent to them for review. • Following up with assigned interviewers to obtain the *Faculty Interview Report* for each applicant interviewed. • Requiring completion of the correct interview report for each applicant interviewed.
Rating	Medium
Management Response	MSTP Management will develop and implement formal procedures for: • Following up with assigned reviewers once applications are sent for review. Reviewers will be given a two week deadline to submit their reviews. Email reminders will be sent every 3 days until the reviews are submitted. The Administrative Director will call and/or meet with the reviewer if the report is not submitted by the deadline. • Following up with assigned interviewers to obtain the interview report. As with the reviewers, interviewers will be given a two week deadline post interview to submit reports. Email reminders will be sent every 3 days until the report is submitted. The Administrative Director will call and/or meet with the interviewer if the report is not submitted by the deadline. • Requiring completion of the correct interview form. Each interview report will be reviewed at the time of submission by the interviewer and the correct format requested.

	These procedures will be implemented during the next recruitment cycle which starts in September 2020.
Responsible Party	Dr. Hariyadarshi Pannu, Administrative Director - MSTP
Implementation Date	October 1, 2020