Submitted to:

Arizona Global:

John Paul (JP) Jones, Dean of Global Education Stephanie Adamson, Assistant Dean, Global Admissions and Enrollment Sergio Ayala, Associate Director, International Admissions Processing

College of Medicine – Phoenix:

Guy Reed, MD, MS, Dean

Glen Fogerty, Assistant Professor & Associate Dean, Admissions-Recruitment & Director, MD/MBA Program Mark David Priolo, Director, Admissions and Recruitment

College of Medicine – Tucson:

Michael M. I. Abecassis, MD, MBA, Dean Tejal Parikh, MD, Associate Dean, Admissions Emily Leyva, Director, Admissions

College of Veterinary Medicine:

Julie Funk, DVM, MS, PhD, Dean

Teresa Graham Brett, JD, Interim Senior Associate Dean, Student Affairs, Diversity, Equity, and Inclusion

Katie Beringson, MEd, Director, Student Affairs and Admissions

<u>Enrollment Management – Undergraduate Admissions:</u>

Kasey Urquídez, EdD, Vice President and Dean

Arezu Corella, PhD, Assistant Vice President, Operations & Systems and Associate Dean

Danielle Crosby, Senior Director, Admissions Processing

Graduate College:

Andrew H. Carnie, Vice Provost for Graduate Education and Dean Dr. Margaret J. Pitts, Associate Dean Rhea Gowin, Director, Admissions

James E. Rogers College of Law:

Marc L. Miller, Dean

Karen M. Kowalski, Associate Dean, Administration and Chief of Staff

Cary L. Cluck, Assistant Dean, Admissions and Financial Aid

Keith Swisher, Professor of Legal Ethics; Director, BA in Law and Master of Legal Studies Programs

Tara Sklar, Professor of Health Law; Director, Health Law & Policy Program

R. Ken Coit College of Pharmacy:

Rick Schnellmann, PhD, Dean

Jeannie K. Lee, PharmD, BCPS, BCGP, FASHP, AGSF, Assistant Dean, Student Services

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,

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.

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.

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					

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.
- 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.

- 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.

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.

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.



According to the data EM-APU provided for the audit, around 53,000

This page intentionally left blank