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Your Higher Education Auditing Connection





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- Developed by ACUA members with subject matter expertise
- Focused on higher education specific topics

https://acua.org/Audit-Tools/ACUA-Kick-Starters



Advancing Auditing in Higher Education

Do you have a great idea for an ACUA Kick Starter? Contact Lily Ly at <a href="mailto:lilyly@aa.ufl.edu">lilyly@aa.ufl.edu</a>.





#### New Kick Starter Available!

#### Succession Planning

Download today in the members-only section of <a href="https://www.ACUA.org">www.ACUA.org</a>



Advancing Auditing in Higher Education





#### **Stay Updated**

- The College and University Auditor is ACUA's official journal. Current and past issues are posted on the ACUA website.
- News relevant to Higher Ed internal audit is posted on the front page. Articles are also archived for your reference under the Resources/ACUA News.

#### **Get Educated**

- Take advantage of the several FREE webinars held throughout the year.
- Attend one of our upcoming conferences:

**Audit Interactive** 

April 5 – 8, 2020 Nashville, TN

#### **AuditCon**

September 13 – 17, 2020 San Antonio, TX

Contact ACUA Faculty for training needs.

#### **Get Involved**

- The latest Volunteer openings are posted on the front page of the website.
- Visit the listing of Committee Chairs to learn about the various areas where you might participate.
- Nominate one of your colleagues for an ACUA annual award.
- · Submit a conference proposal.
- · Present a webinar.
- · Become a Mentor
- · Write an article for the C&U Auditor.
- Write a Kick Starter.



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#### **Connect with Colleagues**

- Subscribe to one or more Forums on the Connect ACUA to obtain feedback and share your insights on topics of concern to higher education internal auditors.
- Search the Membership Directory to connect with your peers.
- Share, Like, Tweet & Connect on social media.

#### **Solve Problems**

- Discounts and special offers from ACUA's Strategic Partners
- Kick Starters
- Risk Dictionary
- Mentorship Program
- NCAA Guides
- Resource Library
- Internal Audit Awareness Tools
- Governmental Affairs Updates
- Survey Results
- · Career Center.....and much more.



## **AUDIT** Interactive

A Higher Education Collaborative Experience

April 5–8, 2020 Nashville, TN · Loews Vanderbilt Hotel



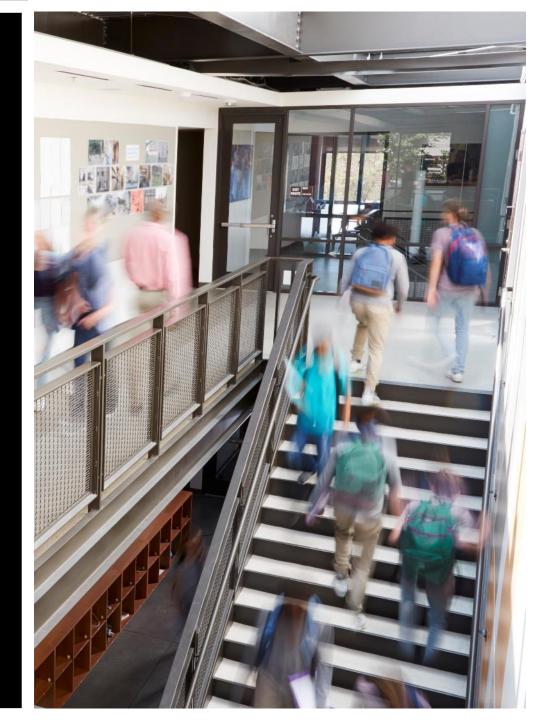
**BAKER TILLY AND ACUA WEBINAR** 

## Climbing the ranks:

Best practices for preventing fraud and misreporting in admissions and institutional data reporting







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INTRODUCTIONS

## Today's webinar moderator



Lisa Gendusa
ACUA Virtual Learning Director
Internal Auditor
Texas State University System







#### **INTRODUCTIONS**

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**INTRODUCTIONS** 

## Today's speakers



**Chris Garrity** CPA, CIA, CFE, CGMA, MBA Director of Internal Audit Saint Joseph's University



**Adrienne Larmett** MBA, CRA Senior Manager Baker Tilly





#### Session summary

- Admissions practices have recently come under fire due to fraud and declining enrollments
- Admissions data drives externally reported data used for ranking purposes
- Institutional data practices and subsequent reported data have drawn scrutiny because of ongoing fraud and misreporting
- Both fraud and misreporting in admissions and data reporting impact an institution's reputation and enrollment status







#### Objectives

- Define the admissions and data reporting landscape and processes
- Identify how and why fraud and misreporting occur, and their impacts on an institution
- Recognize challenges in admissions and data reporting
- Develop approaches for evaluating controls over admissions and data reporting







#### About admissions

What

What is the admissions process?

Who

Who is involved in the admissions process?

Why

Why does the process, and related controls matter?





#### About institutional data reporting

What

What is institutional data reporting?

Whc

Who uses the information reported?

Why

Why do institutions have to report data?





#### Polling question #1

Does your institution audit admissions or institutional data?

- a. Yes
- b. No
- c. Unsure







#### Admissions fraud

This list includes institutions involved in the current admissions scandal, and as a result, are under investigation by the US Department of Education.

- University of Southern California (USC)
- University of California Los Angeles (UCLA)
- Stanford University
- Georgetown University
- Yale University
- Wake Forest University
- University of Texas at Austin
- University of California San Diego





### Data reporting fraud and misreporting

This list includes institutions that have experienced issues with data reporting integrity:

- Claremont McKenna
- Bucknell University
- Tulane University
- Emory University
- George Washington University
- Villanova University
- Austin Peay State University

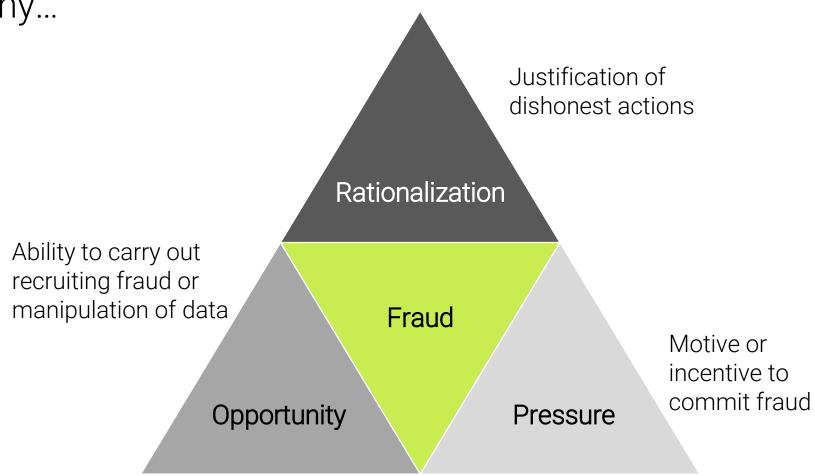
- Dakota Weslyan University
- Drury University
- Hampton University
- Oklahoma City University
- Randolph College
- Saint Louis University
- Saint Martin's University

- Pepperdine University
- Temple University
- University of California Berkeley
- Scripps College
- Mars Hill University
- University of North Carolina Pembroke
- Johnson & Wales University





The why...







The how: admissions...

Polices and procedures

Decentralization of recruiting and admissions

Communication breakdown

Culture





The how: data reporting...

Recruiting and admissions

Test scores

Reputational ranking

Graduation rates





#### Polling question #2

Does your institution foster a culture where ethics and compliance in admissions and data reporting is expected?

- a. Yes
- b. No
- c. Unsure



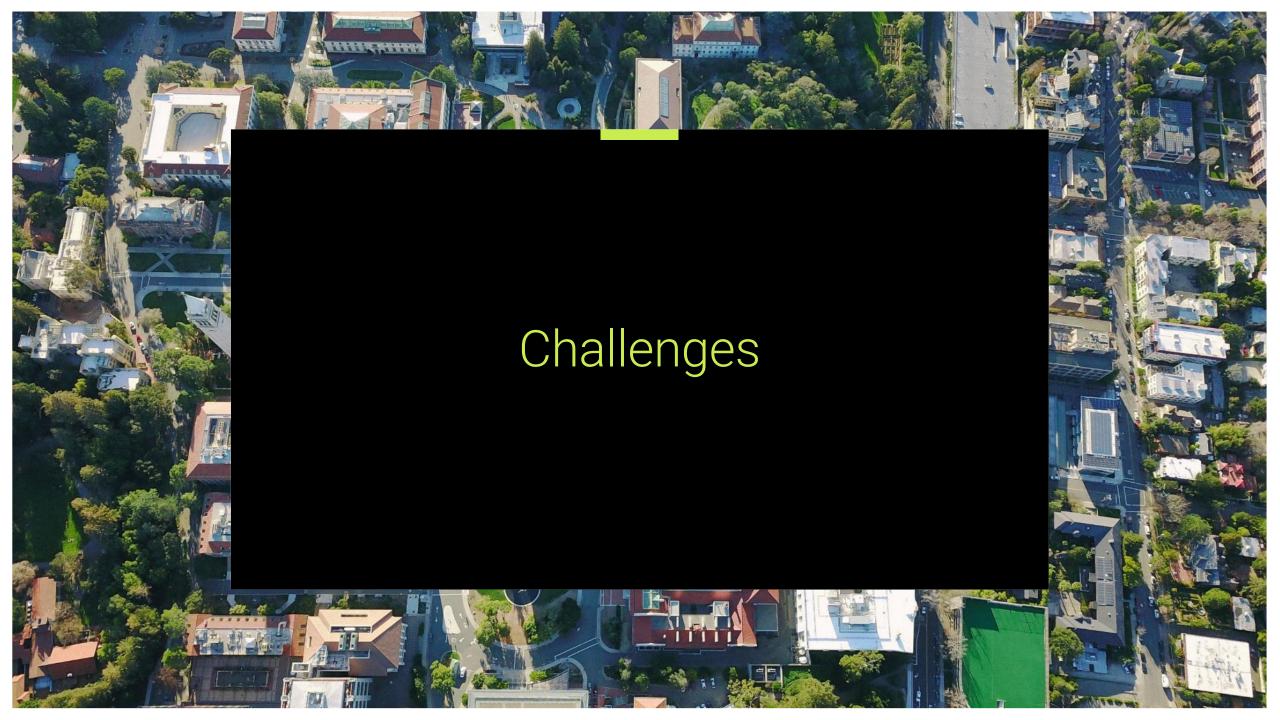




#### Consequences of misreporting

- Reputational damages
- Financial and legal penalties and fines
- Loss of ranking (and potential loss of ability to recruit)
- Loss of accreditation
- Increased inquiries and audits by outside agencies
- Increased administrative costs and burdens to improve oversight and processes









### Challenges in admissions

- Informal or undefined roles and responsibilities within the admissions process
- Lack of formalized procedures for admissions decision making
- Ambiguity with institution-wide standards surrounding unique groups of students (e.g., athletes, honors students, legacy status students, merit scholars)
- Inconsistent application on how admissions criteria, such as test scores and extra curricular activities, factor into the decision-making process
- Lack of disclosures for ALL students to acknowledge that the information presented with their application is free from error





#### Challenges in athletic recruitment

- Undocumented policies and procedures for coaches' involvement within the admissions office
- Lack of compliance regulations around verification of an athletes' status
- Absence of special admissions committees







### Challenges in institutional data reporting

- Decentralized preparation of reports and surveys
- Inconsistent roles and responsibilities for those involved in reporting
- Inconsistent attention to detail and review (human error)
- Informal or undefined processes for data extraction and compilation
- Informal or lack of quality control review







### Challenges in institutional data reporting (cont.)

- Documentation retention (i.e., missing or incomplete documentation)
- Varying interpretations and definitions for survey questions asked
- Changing metrics and definitions by rankings agencies
- Inconsistent time periods used to extract data (e.g., university census, academic year, calendar year, end of semester)
- Different systems used to extract data

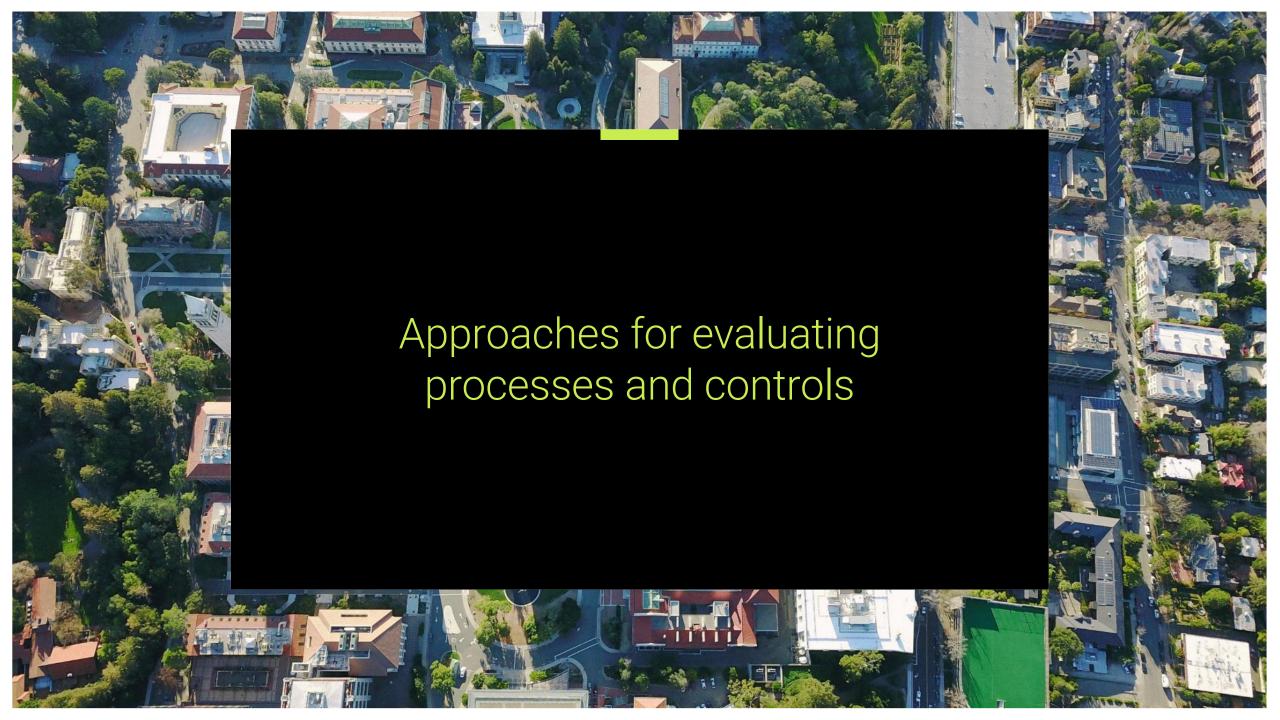




#### Polling question #3

Does your institution have documented policies and procedures for admissions and institutional data reporting?

- a. Yes
- b. No
- c. Unsure







## Approaches for evaluating admissions controls

- Assess institutional culture
- Identify potential risk areas
- Determine the effectiveness of personnel
- Evaluate the admissions process
- Track admissions requirements
- Monitor admissions conduct and controls
- Evaluate technology resources
- Identify unintended consequences





#### Approaches for special admits

- Compare institution-wide standards for general admits versus special admits
- Assess the relationship and communication between admissions and athletics department and coaches
- Perform data analytics on the proportion of athletics or special admits to overall admits
- Identify students admitted as athletes or others who are not participating in their sport or activity
- Review the controls in place to verify a prospective athlete or special admits credentials prior to granting admissions





# Approaches for evaluating institutional data reporting controls

- Evaluate organization and reporting structure
- Determine mission, authority and oversight of central institutional research office
- Gain an understanding of the volume or scale of material reported externally (centrally and at school/college/department level)
- Evaluate whether IR staffing is scalable to meet survey volume and review demands
- Evaluate whether schools and colleges have appropriate and skilled personnel preparing surveys and reports
- Determine whether policies and processes are documented around authority, submission, data extraction and review of materials





## Approaches for evaluating institutional data reporting controls (cont.)

- Assess whether the institution maintains a data dictionary of commonly used interpretations or definitions of key terms or questions asked, or key system queries
- Identify where completed surveys, and data extracted for surveys, will be maintained
- Determine whether the institutional census has been designated as the time frame for extracting data, unless the survey specifies otherwise
- Identify key systems involved in maintaining data, and understand how data enters the systems and is extracted
- Test a sample of data elements to determine whether keys controls are working effectively. The process should be repeatable, and you should be able to reach the same answers!

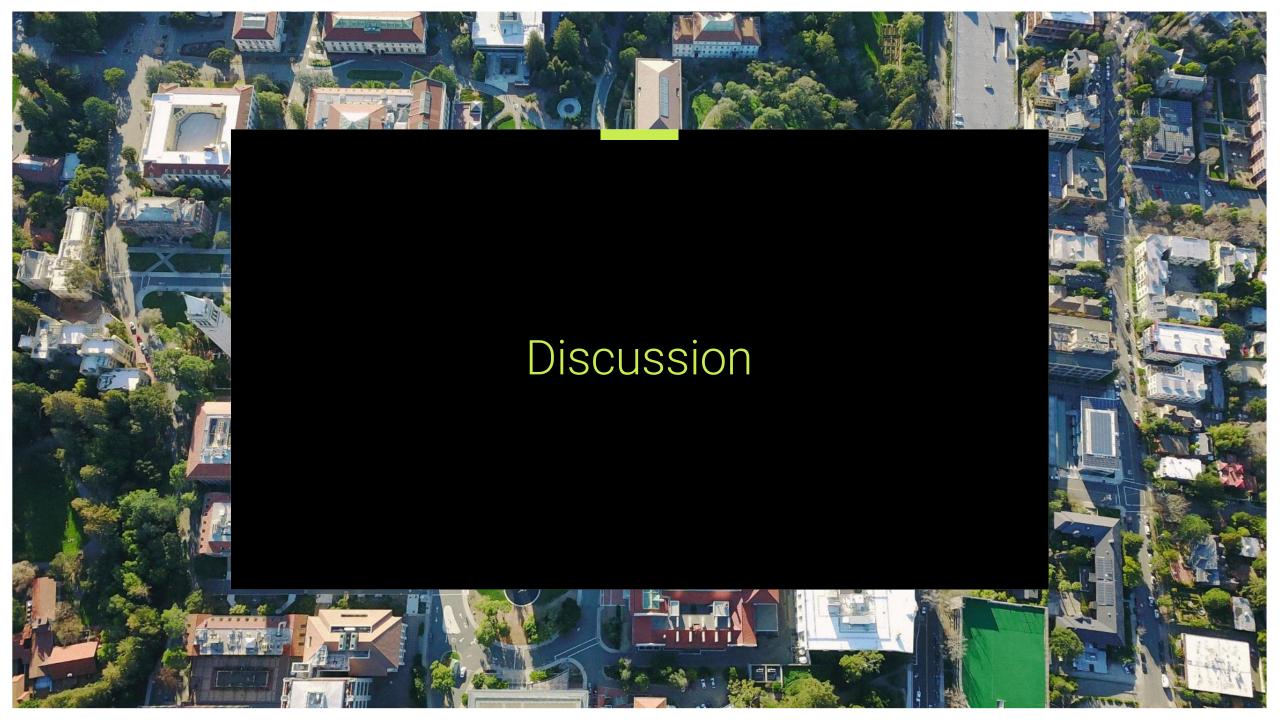




#### Polling question #4

Where does your Institutional Research function reside organizationally?

- a. President
- b. Provost
- c. Enrollment Management
- d. No central Institutional Research function





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