



Audit of Admissions Policy Compliance

**Report No. 21/22-08
June 23, 2022**



Date: June 23, 2022

To: Kevin Coughlin, Jr., Vice President of Enrollment Management and Services

From: Trevor L. Williams, Chief Audit Executive

A handwritten signature in blue ink, appearing to read "Trevor L. Williams", is written over the "From:" line.

Subject: **Audit of Admissions Policy Compliance – Report No. 21/22-08**

We have completed an audit of Admissions Policy Compliance for the Summer 2020 through Spring 2021 terms for undergraduate students classified as First-Time-In-College (FTIC).

The Florida Board of Governors (BOG) sets the minimum requirements for undergraduate admissions for all State University System of Florida institutions, while the University through its policies and procedures can set higher standards. During the audit, we evaluated FTIC students to ensure compliance with the requirements for undergraduate admission. Additionally, we determined whether the admissions process used a systematic and unbiased approach for admitting students and evaluated the information technology (IT) controls over employee access to the Admissions pages of the Admissions and Recruiting module of Campus Solutions.

The Office of Admissions, encompassing Admissions Operations and University Admissions (collectively, "Admissions") oversees the review and acceptance of undergraduate student applications. Admissions accepted 11,673 FTIC students for the Summer 2020 through Spring 2021 terms from 20,177 applications received.

In summary, we concluded that Admissions generally has adequate procedures and controls in place to ensure compliance with University policies and procedures, and state laws, rules, and BOG regulations, although instances of non-compliance were noted. Opportunities for process improvements were noted for the application and review process and IT access controls. The audit resulted in nine recommendations, which management has already started implementing.

We want to take this opportunity to express our appreciation to you and your staff for the cooperation and courtesies extended to us during the audit.

Attachment

C: FIU Board of Trustees

Kenneth A. Jessell, Interim University President

Elizabeth M. Bejar, Interim Provost, Executive Vice President, and Chief Operating Officer

Aime Martinez, Interim Chief Financial Officer and Vice President for Finance and Administration

Javier I. Marques, Vice President for Operations & Safety and Chief of Staff, Office of the President

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EXECUTIVE SUMMARY

Introduction

Admissions oversees undergraduate FTIC student college applications. The Florida Board of Governors (BOG) Regulation 6.002 and FIU policies establish minimum admission requirements. The system automatically approves students who meet the University's minimum admissions criteria (GPA and Test Scores) at the time of the application. Students who meet the minimum requirements set by the BOG but fall below the minimum requirements set by the University automatically receive a holistic review by Admissions. In many cases, the admission application process relies on manual procedures performed by trained staff.

What We Did

We performed this audit to determine whether the established controls for FTIC student admission are a) adequate and effective, b) being adhered to, and c) in accordance with University policies and procedures, and applicable laws, rules, and BOG regulations.

Include all relevant notes and documentation, in PantherSoft and ImageNow, to support the decision to admit a student who does not meet the minimum requirements set by the University and is admitted through alternate admission protocol such as a holistic review

What We Concluded

In summary, we found that Admissions generally has adequate procedures and controls in place to ensure compliance with the BOG regulations and University policies and procedures. Nevertheless, we found instances of non-compliance with those policies and BOG regulations pertaining to admitted students not meeting the University admission requirements. In general, there is also an observed need for better documentation of rationale and support for admission decisions made. The actions recommended will strengthen internal controls and provide transparency to the admissions process.

Use Proper Admission Requirements

For the Summer 2020 and Fall 2020 terms, management admitted eight students using the incorrect Admit Grid, thus admitting them with GPAs and/or test scores below the minimum requirements set by the University. Formalize the process for establishing the effective implementation date for Admit Grids, taking into account the time frame required for IT staff to develop and test, to ensure a seamless implementation and consistent application.

Properly Document Rationale and Decisions

Documented rationale for students who were admitted through an alternate admission protocol during the terms audited was not always present. For instance, we noted that 14 students were approved with GPA and/or test scores below the minimum requirements, 37 other cases where the admission was approved via a holistic review, and one student was accepted for the summer term but did not meet the minimum requirements, all without adequately documented rationale and/or support for the admission decision.

or Appeals Committee review. This includes pertinent documents from said reviews by an Admissions employee.

Quality Control to Detect and Correct Human Errors

While human error may commonly occur, having control activities to detect and correct them in a timely manner is indicative of adequate internal controls.

- FTIC students applying for standard admission to the State University System (SUS) are required to meet minimum high school credits. We found that six of 15 students tested did not appear to meet the BOG's minimum high school credits requirement based on the information reflected in PantherSoft. However, further review confirmed that four of the six students did meet the requirement, but the evaluator had not updated PantherSoft, and/or there was a calculation error. The other two students did not provide a final transcript and transcript holds were not put in place. Ensure that each admitted student has submitted the final transcript and meets the BOG's high school credits requirement. If the final transcript is not received, then the existing hold should not be lifted until the student provides the documentation to be compliant with the BOG's requirements.
- During our testing of manual grade entries from students' hard copy transcripts into PantherSoft, we found input errors with five students' records. Additionally, of the 36 total manual grades overrides during the period (accounting for 14 students), we tested 10 (belonging to 10 students) and found two manual changes to EDI (Electronic Data Interchange) data that did not correspond to the actual EDI raw file. Develop a quality control process to review manual entries and override changes to EDI data for accuracy and/or proper documentation of rationale and support for the change.

System Access Controls

We found that 64% of employees, including nine terminated and six transferred employees, as well 11 student-employees, with access to write/edit in the Admissions pages of Campus Solutions had improper access. Establish a process to verify that all employees' accesses to the Admissions and Recruiting module of Campus Solutions are proper and authorized and that all write/edit access has been removed after each employee separates from the University, transfers out of the department, or has a change in role not requiring access to write/edit. Additionally, internal controls would benefit from the design of a student role within the Admissions pages of Campus Solutions that would limit student-employee access.

The Observations and Recommendations section beginning on page 9 of this report provides detailed descriptions of the foregoing observations. We have also included the mitigation plans management has proposed in response to our observations and recommendations, along with their implementation dates and complexity ratings.

OBJECTIVES, SCOPE, AND METHODOLOGY

Pursuant to the Office of Internal Audit (OIA) approved annual plan for the 2021-2022 fiscal year, we completed an audit of admissions policy compliance. In 2019, there were several publicized reports of a college admissions bribery scandal involving criminal conspiracy to influence undergraduate admissions decisions at several top American universities. The scandal triggered a federal investigation called “Operation Varsity Blues” that uncovered bribes to college coaches, athletic administrators, and to SAT/ACT test proctors. This phenomenon was a contributing risk factor for performing an audit of FIU’s admissions policy compliance.

The primary objectives of our audit were to evaluate if:

1. the established controls for admissions acceptance were a) adequate and effective, b) being adhered to, and c) in accordance with University policies and procedures, laws, rules and BOG regulations. Specifically, we ensured that students classified as FTIC met the minimum requirements for undergraduate admission set by the University and the BOG;
2. the admission process used a systematic and unbiased approach for admitting students; and
3. the University had proper IT access controls over employees with access to the Admissions pages of Campus Solutions.



Our audit period included admissions to the Summer 2020 through Spring 2021 terms. Additionally, we assessed current IT access controls through March 15, 2022.

The audit was conducted in conformance with the *International Standards for the Professional Practice of Internal Auditing* promulgated by The Institute of Internal Auditors. The audit included tests of the supporting records, systems, and processes, and the performance of such other auditing procedures, as we considered necessary under the circumstances. Audit planning was conducted July through September 2021, and fieldwork was conducted November 2021 through April 2022.

During the audit, we:

- reviewed University policies and procedures, and applicable laws, rules, and regulations,
- interviewed responsible personnel,
- evaluated the overall admissions process,
- applied data analytics techniques to identify potential admission issues, and
- reviewed the established controls and procedures for Admissions.

Sample sizes and students selected for testing were determined on a judgmental basis applying a non-statistical sampling methodology.

As part of our audit, we reviewed internal audit reports issued during the last three years and found no reports with any applicable recommendation related to the scope and objectives of this audit, which otherwise would have required follow-up.

BACKGROUND

Florida International University's (FIU) Admissions oversees the review of and acceptance of undergraduate student applications. During the application submission period for the 2020 summer term through the 2021 spring term, Admissions received 20,177 FTIC student applications, of which the University accepted 11,673 students. This audit focused only on FTIC students since they form the largest number of applicants and therefore, represent the greater risk to the University related to admissions. Transfer and graduate student admissions were not part of this audit.

Admissions follows the Board of Governors Regulation 6.002, *Admission of Undergraduate First-Time-in-College, Degree-Seeking Freshmen* that establishes the minimum requirements for FTIC students seeking admission to an undergraduate degree program in the State University System of Florida ("SUS"), as well as the minimum requirements established by the University.



Regulation 6.002 states that the FTIC student should:

- Have earned a standard high school diploma from a Florida public or regionally accredited high school, or its equivalent, and who have earned fewer than 12 semester hours of transferable college credit since receiving the diploma,
- Submit or authorize transmission of a complete official academic transcript of all secondary work,
- Present an official SAT and/or ACT score,
- Demonstrate competency of foreign language or American Sign Language equivalent to the second high school level or higher,
- Meet a 2.5 or higher-grade point average (GPA) on a 4.00 scale as calculated by the University, and
- Complete a minimum number of high school credits in specific courses.

Applicants who are not eligible for standard admission may be considered for alternative admission. The University may consider other factors aside from GPA and test scores in the review of the student's application for admission. These factors may include, but are not limited to, the following:

- A combination of test scores and GPA that indicate potential for success
- Improvement in high school record
- Family educational background
- Socioeconomic status
- Graduation from low-performing high school

- Geographic location
- Military service
- Special talents or abilities
- Other circumstances.

On March 25, 2020, the Florida BOG amended Regulation 6.002 removing specific test score minimums for students with a 3.0 GPA or higher, thus providing greater flexibility for State University System institutions. Although the BOG removed test score minimums for students with a 3.0 GPA or higher, the Regulation also stated that “Individual institutions may choose to establish more stringent admission requirements within the parameters outlined in Board of Governors regulations.” FIU still required minimum test scores for admission purposes following this change.

FIU’s undergraduate admission process begins with an online application through the University website. Students are required to fill out the form and provide any additional necessary support. Once the University receives the admission application, Admissions



reviews the application for completeness and admission eligibility. Admissions utilizes an admission grid (Admit Grid) that contains the admissions criteria (GPA and test scores) set by the University for each individual term. As the admission application window closes, the University evaluates its admission’s goals and modifies the Admit Grid, either by increasing or decreasing the minimum GPA required and/or test scores, depending on current admission levels and program requirements.

There were four Admit Grids issued for admissions to the Summer 2020 through Spring 2021 terms, as follows:

- 1st Admit Grid issued on September 23, 2019,
- 2nd Admit Grid issued on November 18, 2019,
- 3rd Admit Grid issued on January 10, 2020,
- 4th Admit Grid issued on February 4, 2020.

Table 1 – FIU Admission Requirements *									
Admit Grid	Summer 2020			Fall 2020			Spring 2021		
	GPA	Test Score SAT / ACT		GPA	Test Score SAT / ACT		GPA	Test Score SAT / ACT	
1 st Admit Grid issued on September 23, 2019	3.4-4.0+	1030-1600	20-36	3.6-4.0+	1160-1600	26-36	N/A	N/A	N/A
2 nd Admit Grid issued on November 18, 2019	3.5-4.0+	1100-1600	22-36	3.6-4.0+	1200-1600	25-36	N/A	N/A	N/A
3 rd Admit Grid issued on January 10, 2020	3.5-4.0+	1100-1600	22-36	3.6-4.0+	1200-1600	25-36	3.0-4.0+	990-1600	22-36
4 th Admit Grid issued on February 4, 2020	3.5-4.0+	1100-1600	22-36	3.6-4.0+	1200-1600	25-36	3.0-4.0+	990-1600	22-36

Source: Office of Admissions

*These represent the GPA and test score ranges, per semester, per Admit Grid, which FIU required. However, depending on the student's GPA, there was a required minimum test score in order to be admitted.

The Admit Grid determines the minimum GPA and corresponding test score (SAT and/or ACT) accepted for a specific term. The University uses the weighted grade point average for admission purposes. Once Admissions completes its evaluation of the student's admission application, they decide to either accept, deny, or defer making a decision.

- Accepted students receive an acceptance letter via regular mail.
- Denied students can submit an appeals application for reconsideration.
- Deferred students need to submit new test scores and/or new high school transcripts to be considered.

Students who meet the minimum requirements set by the BOG but not the FIU admissions criteria are given a holistic review by Admissions employees. The review includes factors which determine a student's overall potential for success at FIU. Those students who do not meet the minimum requirements set by the BOG can appeal the decision and have their petition reviewed by the Admissions Petition and Review Committee ("Committee"), which will consider both cognitive and non-cognitive student characteristics. This Committee is made up of select members of the faculty and staff.

OVERALL ASSESSMENT OF INTERNAL CONTROLS

Our overall assessment of internal controls is presented in the table below.

INTERNAL CONTROLS ASSESSMENT			
CRITERIA	SATISFACTORY	OPPORTUNITIES TO IMPROVE	INADEQUATE
Process Controls		X	
Policy & Procedures Compliance		X	
Effect	X		
Information Risk		X	
External Risk	X		
INTERNAL CONTROLS LEGEND			
CRITERIA	SATISFACTORY	OPPORTUNITIES TO IMPROVE	INADEQUATE
Process Controls: Activities established mainly through policies and procedures to ensure that risks are mitigated, and objectives are achieved.	Effective	Opportunities exist to improve effectiveness	Do not exist or are not reliable
Policy & Procedures Compliance: The degree of compliance with process controls – policies and procedures.	Non-compliance issues are minor	Non-compliance issues may be systematic	Non-compliance issues are pervasive, significant, or have severe consequences
Effect: The potential negative impact to the operations- financial, reputational, social, etc.	Not likely to impact operations or program outcomes	Impact on outcomes contained	Negative impact on outcomes
Information Risk: The risk that information upon which a business decision is made is inaccurate.	Information systems are reliable	Data systems are mostly accurate but need to be improved	Systems produce incomplete or inaccurate data which may cause inappropriate financial and operational decisions
External Risk: Risks arising from events outside of the organization's control, e.g., political, legal, social, cybersecurity, economic, environment, etc.	None or low	Potential for damage	Severe risk of damage

OBSERVATIONS AND RECOMMENDATIONS

Areas Within the Scope of the Audit Tested Without Exception:

Controls for Preventing Interference with the Admissions Process by Donors and Related Employees

Even the best controls can become ineffective if overridden. To assess the effectiveness of controls to prevent circumvention of the admissions process by those having the ability or wherewithal to either effectuate or influence the overriding of controls, we designed auditing procedures to satisfy our audit objective.

Foundation Donors

In general, some degree of influence may inherently inure to financial supporters of an organization. To determine whether there had been any influence from donors that may have impacted the admission of a student, we obtained a list of all FIU Foundation donors during our testing period and analyzed donations using the student's name as well as their emergency contact(s) to establish a connection. We found one donor that matched the emergency contact for a student-athlete. However, upon further review, the donation was received months after the student had been admitted. Further, the student's admission was based on a holistic review conducted by Admissions and the student remains a student-athlete. Therefore, we concluded that the student's admission comported to the University's admissions process. Consequently, we found no exceptions by applying the auditing procedures to satisfy our audit objective.

Employees With Admissions Access To Write/Edit

Employees with functional roles within the admissions process ensures the integrity of the process. To determine whether there were instances where such employees may have impacted the admission of a student, we compared employees having "write/edit access" in the Admissions system to admitted students, as well as their emergency contact(s) to establish a connection. We found no employees with access to write/edit on Admissions pages who were named as an admitted student's emergency contact and where the student was admitted under the University's minimum admissions requirements. Therefore, we concluded that the student's admission comported to the University's admissions process. Consequently, we found no exceptions by applying the auditing procedures to satisfy our audit objective.

Florida Legal Residency

Florida Statute 1009.21 requires a student or student's parent to have maintained legal residence in this state for at least *12 consecutive months immediately prior to their initial enrollment at the University*. The student must provide convincing documentation that his or her parent has lived in the state of Florida consecutively for the past 12 months.

Out of 4,786 students classified as in-state for tuition purposes, we identified 96 high-risk students who matriculated, attended out-of-state high schools, and were classified as in-state for tuition purposes. We selected a judgmental sample of 10 students to ensure the students complied with Florida Statute 1009.21. Seven of the 10 students' records contained proper documentation in ImageNow to classify them as in-state for tuition purposes, while two students provided their parent's information (driver's license, vehicle registration, etc.) on the *Admission Application* form and the data was verified via DAVID¹ (Driver and Vehicle Information Database). We conferred with the Office of the General Counsel as to the whether the described practice satisfied the residency verification requirements of Florida Statute 1009.21. In the opinion of the Office of the General Counsel, the completion of such information on the *Admission Application* form complied with the Statute's requirements for providing convincing documentation. Notwithstanding this opinion, the final student provided biographical information for his father erroneously on the *Residency Reclassification Application* form rather than on the *Admission Application* form, which was verified by Admissions via DAVID. This would not comply as convincing documentation, but we understand the form was completed in error.

¹ DAVID is a multifaceted database from the Florida Department of Highway Safety and Motor Vehicles that affords immediate retrieval of driver and motor vehicle information.

Areas Within the Scope of the Audit Tested With Exception:

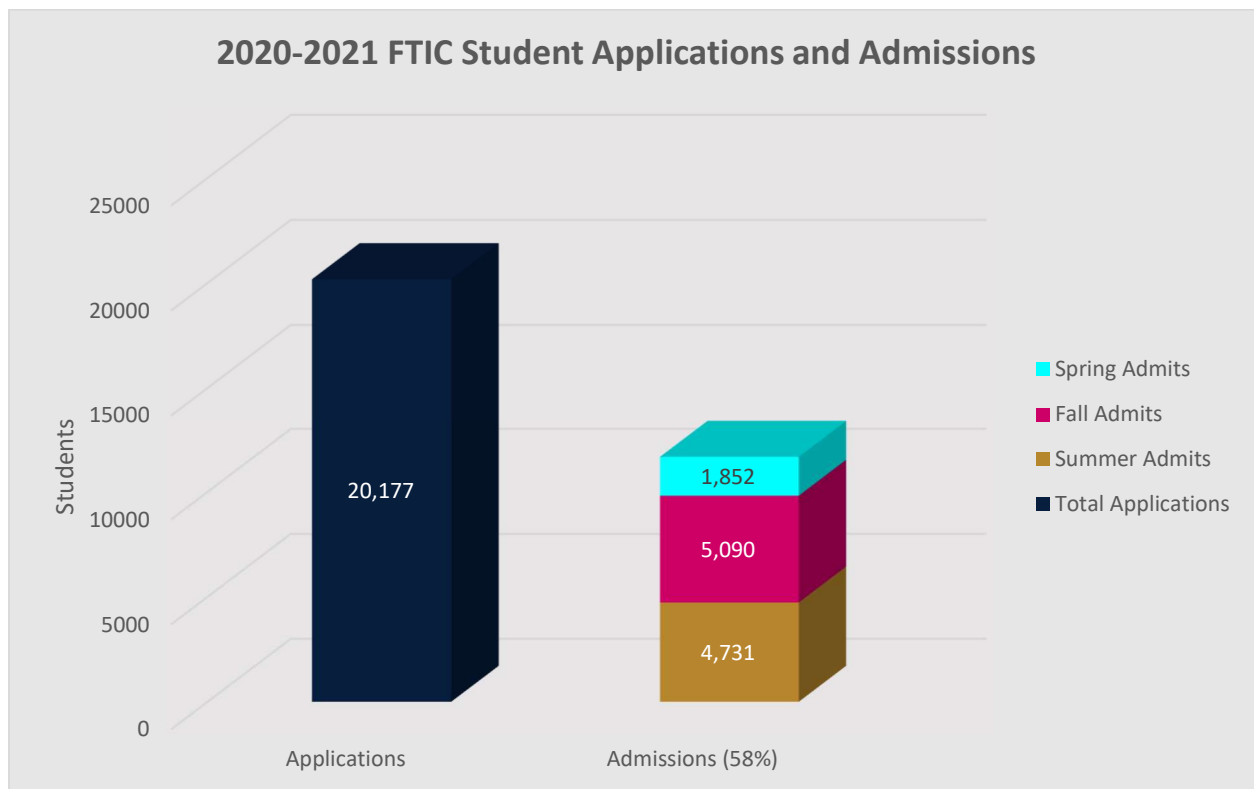
We analyzed FTIC students for admissions eligibility against the BOG's minimum requirements and University's admissions criteria. Specifically, we examined the following admission's criteria:

- GPA (Weighted GPA)
- Test scores (SAT/ACT)
- High school credits requirement
- Florida legal residency

Additionally, we analyzed other areas that could impact the outcome in the admissions process such as employee waivers, transcript overrides, manual transcript entries/overrides, and system access controls.

1. FTIC Student Applications and Admissions

From a total of 20,177 applications, the University admitted 11,673 students classified as FTIC for the Summer 2020 through Spring 2021 terms, as detailed below:



During our analysis we noted the following exceptions for the three semesters tested:

After analyzing the students' admission date, GPA, and test scores, we identified 134 students for Summer, 124 students for Fall, and 20 students for Spring, who appeared not to meet the requirements for admission in effect at the time they were admitted, based on said three criteria.

To determine how these 278 students were admitted, whether it was through an improper Admit Grid, a holistic review, or some other means, we selected a sample of 218 students (74 in Summer, 124 in Fall, and 20 in Spring) and found exceptions with 59 students, as follows:

Table 2 – Exceptions Table				
Exceptions	Summer	Fall	Spring	Total
Incorrect Admit Grid was used to admit student	6*	2	0	8
Student did not meet minimum requirements (GPA/test score) and no evidence of holistic review being conducted or rationale for approval	3	3	8	14
Holistic review conducted but no support of the approval (email) or rationale used found in ImageNow ²	14	17	6	37
Total	23	22	14	59
*One student was admitted using the incorrect Admit Grid from September, but their admission intervened between the November Admit Grid's development and implementation within PantherSoft. The November Admit Grid was dated November 18, 2019, but not implemented in the system until November 24, 2019. Thus, when the student was admitted on November 21, 2019, the system erroneously used the September Admit Grid. Upon further review of the population, we found three additional students that were admitted within this same time span, and who did not meet the November Admit Grid requirements. These three students were thus included in the identified student and sample selection counts for Summer above.				

Students who meet the University's minimum admissions criteria (GPA and/or test scores) at the time of admission get automatically approved by the system, whereas those who do not meet the minimum requirements are reviewed holistically by Admissions. Not properly documenting the rationale used in holistic reviews to admit students with GPA and test scores below University minimum requirements presents an admission eligibility concern at worst, or a lack of transparency at best, for such admissions.

² ImageNow is a document imaging and management tool that allows the University to capture, organize, and manage data as a supplement to PantherSoft.

Employee Waivers

In order to ensure that students admitted below the University's admissions criteria were admitted in a systematic and unbiased manner, we analyzed students with employee tuition waivers for propriety and transparency in their admission.

During our testing, we found three employee waivers matching three students who were admitted with GPA and/or test scores under the minimum requirements set by the University. Upon further review, we found that one student had been accepted by the Admissions Petition and Review Committee and another through a holistic review performed and documented by the Associate VP Academic Affairs. Consequently, we found no exceptions with these admissions.

The third student was approved by an Associate Director of Admissions through a holistic review, but no support or reasonable rationale was documented or provided for the approval. When we inquired as to the rationale used to admit this student, we were informed that the "Student had 3.6 GPA and a 970 SAT, 19 ACT. Was cleared with subsection scores and met the guidelines for admission. Student also was the child of an FIU employee as is evident by their desire to use the employee tuition waiver listed in salesforce." Upon inquiring as to why there was no documented support, the Associate Director of Admissions stated, "I do not recall [the] reasoning as to why I did not add the rationale or documentation for this student back in March 2020. It has to be an oversight on my part." She went on to say, "I usually based my decisions on information from the student, their application materials and what was disseminated from conversations with our recruiters. However, what I am saying is I do not have a paper trail for that specific student other than the original emails from 2020."

Notwithstanding the explanation provided, we found that the student's first documented contact with any University personnel regarding their admission (after their original rejection letter on December 6, 2019), was on May 1, 2020, at 11:59 a.m. and by 4:31 p.m. of the same day, the student was approved for admission.

The fact that the student did not meet the minimum requirements for the summer term according to the February Admit Grid (a 3.6 GPA requires an SAT test score of 1160 or an ACT test score of 24), that there was no documented rationale for their admission, is the child of an FIU employee, and was approved within 4.5 hours, could lead to speculation of impropriety in the admissions process, even when none exists.

By not documenting the rationale used to holistically admit students of relatives working at the University, the admitting process could appear to be biased and inappropriate, potentially leading to skepticism by the public and resulting in damage to the University's image and integrity.

Recommendations

The Office of Admissions should:	
1.1	Formalize the process for establishing the effective implementation date for Admit Grids, taking into account the time frame required for IT staff to develop and test, to ensure a seamless implementation and consistent application.
1.2	Include all relevant notes and documentation, in PantherSoft and ImageNow, to support the decision to admit a student who does not meet the minimum requirements set by the University and is admitted through a holistic review, an Appeals Committee review, or alternate admissions protocol. This includes pertinent documents from said reviews by an Admissions employee.

Management Response/Action Plan

- 1.1 We will modify the admissions criteria approval to include both approval dates and anticipated "go-live" dates (usually a span of 10 business days). Moreover, the actual auto-admit grids will include both dates as templated values, and we will publish these grids for all staff in SharePoint.

Implementation date: July 1, 2022

Complexity rating: 1 - Routine

- 1.2 For all students that we admit who do not meet University criteria, require holistic review, or by alternative admissions protocol, we will include decision dates, program actions, term changes, and basis of admissions (rationale) in a set of fields that can be queried in PantherSoft via the ADM Recommendation Form. We will publish process instructions in a manual via SharePoint each year.

Implementation date: September 1, 2022

Complexity rating: 1 - Routine

2. High School Credits Requirement

Board of Governors Regulation 6.002 requires FTIC students applying for standard admission to the State University System (SUS) to meet minimum high school credits requirements listed in the table below. Applicants who are not eligible for standard admissions may be considered for alternate admission. We noted that PantherSoft does not verify the high school credits requirement at the time of acceptance, and only checks against GPA and test score requirements.

BOG Regulation 6.002 Admission of Undergraduate First-Time-In-College, Degree-Seeking Freshmen	
High School Credits Requirement	
4 credits	– English/Language Arts (three of which must have included substantial writing requirements)
4 credits	– Mathematics (at or above the algebra I level)
3 credits	– Natural Science (two of which must have included substantial laboratory requirements)
3 credits	– Social Science (to include anthropology, history, civics, political science, economics, sociology, psychology, and/or geography)
2 credits	– Foreign Language
2 credits	– Additional academic credits (in any combination of courses listed in the Department of Education Course Code Directory)

Of the 4,731 students admitted to the Summer 2020 term, 2,060 students enrolled for classes. After analyzing the student's records in PantherSoft, we found that 379 students had potential exceptions in the number of courses taken at the high school level as required by the BOG for admissions. From that subset, we selected a sample of 15 students (4%) to review their transcripts and records and found the following:

- A review of four students' transcripts and records verified that the students met the BOG's minimum high school credits requirement, but that PantherSoft was never updated to reflect the credits. According to management, three of the four students were not updated in PantherSoft because the evaluator failed to update the grades properly. Management stated that since, "The two people who focused on data integrity and BOG file have both left this office[,] so many issues have come up as of late...as a result, [we] are considering a different business process for handling these cases." The fourth student's record was referred to the Division of Information Technology (DoIT) for further review as a potential system calculation error. DoIT stated that, "the error lied in the way the Algebra 1B/A course data came in. The Subject field was missing on the back end[,] so it did not calculate or count towards the appropriate subject. When checking our course table data, the course was showing accurately[,] but since this was an older file[,] the process did not check for that record to update it." Management has implemented scripts and queries that identify these issues with older files to fix them.

- Two students' final transcripts could not be found in ImageNow; thus, we were unable to validate the credits earned during the 12th grade. Both students were missing one of the four required English courses. All FTIC students who are provisionally admitted to FIU are put on registration hold and are not able to register for their second term unless all final, official transcripts are received. According to management, one student was assigned a transcript hold, which was subsequently lifted at the request of an Outreach Specialist who was working with the student to get their documents. The other student was never assigned a transcript hold. Nevertheless, management properly reported them to the BOG as alternate admits, as required by the BOG when a student is admitted and does not meet their minimum requirements.

Alternate Admits

BOG Regulation 6.002 requires that "The number of first-time-in-college students admitted through alternative admission at each university shall be determined by the university board of trustees [BOT]." However, we understand that the University BOT has not set up a maximum number for alternative admits permitted.

Our review of the Summer 2020, Fall 2020, and Spring 2021 admission files submitted to the BOG reflect that the University's alternate admit rate as a percentage of all FTIC admitted students was as follows: Summer 2020, 26%, Fall 2020, 23%, and Spring 2021, 33%.

The University risks admitting students not meeting the minimum high school credits requirement if their records are either incomplete or holds are not placed on their accounts pending the receipt of final transcripts. Furthermore, not setting a limit on the number of alternative admit students permitted, risks being in non-compliance with BOG Regulation 6.002.

Recommendations

The Office of Admissions should ensure:	
2.1	That each admitted student has submitted the final transcript and meets the BOG's high school credits requirement. If the final transcript is not received, then the existing hold should not be lifted until the student provides the documentation to be compliant with the BOG's requirements.
2.2	That the Board of Trustees determines the number of alternative admit students permitted as required by BOG Regulation 6.002.

Management Response/Action Plan

- 2.1 The Director of Admissions Operations (or designee) will no longer lift the hold without written Presidential Approval.

Implementation date: July 1, 2022

Complexity rating: 1 - Routine

- 2.2 The Provost, with support from the Vice President for Enrollment, will work with Academic Planning and Accountability to develop a formal policy statement concerning alternative admission procedures. This statement will replace existing goal table entries in the FLBOG accountability plan as a control on the number students admitted via alternative standards. We will have this policy approved by the FIU BOT by the December 2022 meeting.

Implementation date: December 30, 2022

Complexity rating: 1 - Routine

3. Manual Transcript Data Entry

Private and out-of-state high schools do not provide student transcripts via EDI (Electronic Data Interchange) but rather through hard copies and/or emails. Hard copy data received by FIU must be manually entered into PantherSoft. We selected a sample of 10 students out of 3,112 students admitted from private and out-of-state high schools and found that five students selected had inconsistent records in PantherSoft compared to their official high school transcripts. The five students had one or more of the following issues:

- Course grades entered into PantherSoft had no grade for the corresponding course in the student's transcript
- Grades missing the plus sign
- Incorrect grades entered for the grading period
- Letters "PP" entered for a class that contained a grade in the transcript
- Grades entered using the average grade as opposed to the exact semester grades
- Missing elective grades.
- Grades missing the code for Honors and Advanced Placement (AP) classes.

Incorrect data entered can potentially impact the student's GPA, causing the University to potentially admit ineligible students and/or reject eligible ones.

Recommendation

The Office of Admissions should:	
3.1	Develop a quality control process to review manual transcript data entry of private and out-of-state high schools to ensure its accuracy.

Management Response/Action Plan

- 3.1 In December of 2021, Admissions Operations included the School Reported GPA as a required field in the manual transcript entry process; through this modification, we can highlight substantial differences between calculated and reported GPA's. In May 2022, we hired a manager who, as part of her standard duties, will run quarterly audits of calculated and reported GPA's. We will use the results of the audits to augment training for specific team members or develop new process modifications when errors appear to be systematic.

Implementation date: July 1, 2022

Complexity rating: 1 - Routine

4. EDI Manual Overrides

In order to validate the EDI manual overrides, we obtained a list from Admissions of all the manual changes to EDI data during our audit period. The list contained 36 manual overrides affecting 14 different students. We selected a sample of 10 EDI manual overrides associated with 10 different students and found the following two exceptions:

- One EDI manual override changed the student's grade from a "D+" to a "B." The final high school transcript from June 9, 2020, did not reflect the B grade; thus, making the change invalid. Moreover, the EDI change was recorded, but no support was found in PantherSoft or in ImageNow. Management confirmed it was a mistake made by the evaluator.
- One EDI manual override changed a blank grade to an "A" grade, whereas the last official transcript received by the University reflected the course in question as "in-progress," thus not completed. However, a final grade of "A" remained under the "Current Official Grade," which is used to calculate a student's GPA. The student did not submit the final transcript to show their final grade. Management confirmed the evaluator was too early in posting the grade by relying on a progress report rather than on the final grade transcript.

Invalid EDI manual overrides could potentially impact a student's GPA, causing the University to potentially admit ineligible students and/or reject eligible ones.

Recommendation

The Office of Admissions should:	
4.1	Develop a quality control process to review each override change to EDI data for accuracy, proper documentation of rationale, and support for the change.

Management Response/Action Plan

- 4.1 For the remainder of the Summer/Fall 2022 enrollment cycle, we will use a query to identify updates to EDI data; we will select samples of these results and conduct accuracy audits. By September 2022, we will be testing a modification to the HS Data Entry Page that will eliminate the need for our team to overwrite any EDI data.

Implementation date: September 1, 2022

Complexity rating: 2 - Moderate

5. Employee System Access

Our testing over system access controls found that 138 of the 214 employees (64%) with access rights to write/edit Admissions pages within the Admissions and Recruiting module of Campus Solutions (PantherSoft) should not have had access to write/edit. These 138 employees had job duties and responsibilities, which did not require them to write/edit on Admissions pages. Included in the 138 were 15 employees, nine of whom had separated from the University between August 2015 and January 2022 and six who had transferred between departments.

We also identified 11 student-employees from among the 138 with write/edit access whose job duties and responsibilities did not require such access, as well as one student-employee who was identified as requiring such access. Effectively designed internal controls for the Admissions process would prohibit or severely limit the granting of write/edit access to an Admissions pages to student-employees.

Of the 138 employees, we identified 12 employees who made changes to student data between July 1, 2019, and December 31, 2020. However, we had management review the transactional data changed and they determined that all the employees had made changes during a period when they were authorized to do so. Based on our review of the data, we determined that this conclusion appeared reasonable.

System access security is critical to maintain data integrity. Account holders with unauthorized or improper access could present a potential risk to student data and could compromise the system as a whole.

Recommendations

The Office of Admissions should:	
5.1	Run an access report periodically to verify all employees' access to the Admissions pages in Campus Solutions are proper and authorized.
5.2	Confirm with DoIT that all write/edit access to the Admissions and Recruiting Modules of Campus Solutions has been removed after an employee separates from the University, transfers out of the department, or has a change in role not requiring access to write/edit.
5.3	Work with DoIT to develop a student role within the Admissions pages of Campus Solutions that would limit student-employee access.

Management Response/Action Plan

- 5.1 We will maintain a current list of University employees with access to AD modules and keep the list in a secure folder. On a yearly basis, we will send a request to Department heads/managers asking for access confirmation and/or justification for team members.

Implementation date: July 1, 2022

Complexity rating: 1 - Routine

- 5.2 Via a review query, the Director for Admissions Operations and the Assistant Vice President for Enrollment will confirm that all IT separation processes run appropriately. We will engage in these sample audit/review efforts once per fiscal quarter. ASDS will maintain a record of each review in a secured portion of SharePoint.

Implementation date: July 1, 2022



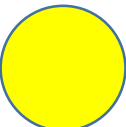




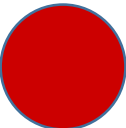

Complexity rating: 1 - Routine

- 5.3 By the end of July 2022, IT will develop and implement a new role for student workers in the admissions areas; this will allow for data entry in specific fields without access to update or delete.

Implementation date: July 31, 2022

Complexity rating: 1 - Routine

APPENDIX I – COMPLEXITY RATINGS LEGEND

Legend: Estimated Time of Completion		Legend: Complexity of Corrective Action	
	Estimated completion date of less than 30 days.		Routine: Corrective action is believed to be uncomplicated, requiring modest adjustment to a process or practice.
	Estimated completion date between 30 to 90 days.		Moderate: Corrective action is believed to be more than routine. Actions involved are more than normal and might involve the development of policies and procedures.
	Estimated completion date between 91 to 180 days.		Complex: Corrective action is believed to be intricate. The solution might require an involved, complicated, and interconnected process stretching across multiple units and/or functions; may necessitate building new infrastructures or materially modifying existing ones.
	Estimated completion date between 181 to 360 days.		
	Estimated completion date of more than 360 days.		Exceptional: Corrective action is believed to be complex, as well as having extraordinary budgetary and operational challenges.

*The first rating symbol reflects the initial assessment based on the implementation date reported by Management, while the second rating symbol reflects the current assessment based on existing conditions and auditor's judgment.

APPENDIX II – OIA CONTACT AND STAFF ACKNOWLEDGMENT:

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In addition to the contact named above, the following staff contributed to this audit in the designated roles:

Dayan Borges (auditor in-charge);
Manuel Sanchez (supervisor and reviewer);
Vivian Gonzalez (independent reviewer).

Definition of Internal Auditing

Internal auditing is an independent, objective assurance and consulting activity designed to add value and improve an organization's operations. It helps an organization accomplish its objectives by bringing a systematic, disciplined approach to evaluate and improve the effectiveness of risk management, control, and governance processes.