



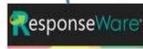
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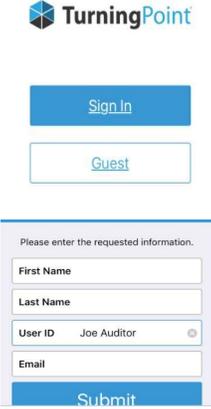


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Climbing the ranks: Best practices for preventing fraud and misreporting in admissions and institutional data reporting

Christopher Garrity Director of Internal Audit, Saint Joseph's University

Adrienne Larmett Senior Manager, Baker Tilly




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Introductions



Chris Garrity
MBA, CPA, CIA, CFE, CGMA
Saint Joseph's University



Adrienne Larmett
MBA, CRA
Baker Tilly



Loretta Maguire
CPA
The College of New Jersey



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Polling Question #1

Does your institution audit admissions or institutional data?

- A. Yes
- B. No
- C. Unsure

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Content

- The admissions and institutional data reporting landscape
- Why and how fraud and misreporting occur
- Institutional impacts and consequences
- Challenges in admissions and institutional data reporting
- Approaches for evaluating processes controls







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The admissions and institutional data reporting landscape





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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?




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About institutional data reporting

What	What is institutional data reporting?
Who	Who uses the information reported?
Why	Why do institutions have to report data?




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Why and how fraud and misreporting occur




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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

0% 0% 0%
  
 Yes No Unsure

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Admissions fraud and schemes

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

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



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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 Wesleyan 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



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The why

Rationalization Justification of dishonest actions

Opportunity Ability to carry out recruiting fraud or manipulation of data

Pressure Motive or incentive to commit fraud

Fraud

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The how: Admissions

Policies and procedures

Decentralization of recruiting and admissions

Communication breakdown

Culture

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The how: Data reporting

Recruiting and admissions	Test scores
Reputational ranking	Graduation rates

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Institutional impacts and consequences

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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




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Challenges in admissions and institutional data reporting




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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




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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






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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






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Challenges in institutional data reporting

- 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




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Polling Question #3
Does your institution have documented policies and procedures for admissions and institutional data reporting?

- A. Yes
- B. No
- C. Unsure

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Approaches for evaluating processes and controls



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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




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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




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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




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Approaches for evaluating institutional data reporting controls (continued)

- 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!




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Polling Question #4
Where does your IR function reside organizationally?

- A. President
- B. Provost
- C. Enrollment Management
- D. No central IR function

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Discussion



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