



October 22, 2019

James B. Milliken
Chancellor
The University of Texas System
210 West 7th Street
Austin, Texas 78701

Dear Chancellor Milliken,

At your request, my office has overseen an inquiry to address anonymous complaints related to The University of Texas at Arlington. We engaged the firm of Protiviti to carry-out the review. Attached you will find a report of their findings. Dr. Karbhari was provided an opportunity to review a draft of the report and he strongly disagreed with any critical findings. Upon considering his response, Protiviti made some edits and provided further clarification of certain points; however, none of their conclusions were changed.

Upon your review of the report, please let me know if you have any questions that Protiviti or I can address for you.

Sincerely,

J. Michael Peppers, CPA, CIA, QIAL, CRMA
Chief Audit Executive

The University of Texas System Internal Investigation Report

October 21, 2019

Table of Contents

Executive Summary	1
Background	5
Engagement and Methodology.....	6
Procedures Performed	7
Findings.....	8
Appendix A – Exhibits	

Executive Summary

The following observations and findings are those of Protiviti, based on interviews and documentary evidence reviewed and gathered during the course of this investigation.

On January 9, 2019, the Texas State Auditor's Office ("SAO") received a complaint via their web-based Fraud, Waste, or Abuse hotline about The University of Texas at Arlington ("UTA"), its senior staff, and the role of a vendor on campus. On February 7, 2019, a second email alleging similar issues was sent to multiple individuals within UTA and The University of Texas System ("UTS"). The emails were signed with the moniker, "Team UTA 2019." The identity or identities of the complainant(s) is unknown. Both emails alleged that a UTA official had improperly accepted payments from a third-party vendor ("Vendor"), a provider of online educational services to UTA, and that UTA allowed Vendor to improperly influence the process by which students are admitted at UTA.

On March 11, 2019, Protiviti was retained by the UT System Audit Office to investigate the allegations raised in the anonymous complaints.

The following five allegations were extracted from the original complaints and, based on our findings, are listed in order of relative significance:

Allegation I - Unfair/Lax Admissions Process for Online Students - Potentially underqualified students are allegedly admitted to online programs managed by Vendor without thorough review, through "direct admission."

Finding: *Substantiated / Policy Violation*

Applicable Rules:

Texas Administrative Code, Chapter 4, Subchapter P, RULE §4.261-2 d

University of Texas System Board of Regents' *Rules and Regulations* 40303: Admissions Procedures for U.T. Institutions

Southern Association of Colleges and Schools Commission on Colleges ("SACS COC"): The Principles of Accreditation

Texas Higher Education Coordinating Board ("THECB") Principles of Good Practice for Degrees and Courses Offered Electronically

In an attempt to grow admissions at UTA specific to their online nursing program, UTA senior officials implemented an admissions program called Direct Admit. This program allowed online transfer students to enroll in one of the UTA nursing programs without immediately checking all of their underlying academic credentials, a standard requirement for admission for UTA on-campus students. However, the Direct Admit program was begun without consultation from UTA's legal or compliance departments, and it appears, based on the evidence, there was limited consideration of potential negative implications of admitting students to UTA prior to determining their eligibility for admissions into the specialty program. Moreover, it was done in spite of repeated oral and written

reservations and concerns raised by admissions officers and other senior officials at the University. Their concerns were put aside and, as a result, the Direct Admit program may have exposed UTA and UTS to potential legal liability.

Allegation II – UTA Officials Inappropriately Influenced by Vendor - Admission processes, and decisions and actions by UTA officials, are alleged to be significantly influenced by Vendor executives.

Finding: *Substantiated / Policy Violation*

Applicable Rules:

Regents' Rule 20205: Expenditures for Travel and Entertainment by Chief Administrators and for the Maintenance of University Residences

UTS 189: Institutional Conflicts of Interest

UTS 191: Travel Guidance for Presidents and Their Spouses

UTA Policy EI-PO2: Conflicts of Interest, Conflict of Commitment, and Outside Activities

Vendor staff were granted access and interactions with UTA admissions personnel in less than an “arms-length” manner. These interactions, according to interviewees, included allowing Vendor to provide input in admissions policies and decisions in meetings with UTA President Dr. Vistasp Karbhari, and multiple officials in the College of Nursing and Health Innovation (“CONHI”), including Senior Associate Dean Dr. Mary Beth Mancini and various levels of staff within the admissions office. According to both Vendor officials and University officials, Vendor staff met with UTA staff on a weekly basis, and were part of many decision-making meetings, including when Direct Admit was created. In addition, according to staff interviews, Vendor personnel made inquiries both by phone and email to a number of admissions staff on a daily basis, usually about the admissions status of hundreds of student-applicants. These inquiries were made with the expectation of a rapid response. When the recipient of the request did not reply the same day or next, the interviewees said their failure to respond would result in escalation by Vendor to senior UTA officials including the Office of the President. Several interviewees reported that such escalations sometimes resulted in in-person meetings with at times Dr. Karbhari, admissions staff and executives of Vendor to discuss what was characterized as a lack of cooperation.

On at least one occasion, the Vendor offered to reimburse UTA for admissions officers' overtime so that applications of potential students could be processed at a faster rate. This offer was accepted. UTA officials confirmed receiving over \$4,000 for overtime monies from Vendor.

The closer than arms-length relationship between UTA and Vendor extended beyond the Admissions Office. Dr. Karbhari has taken at least two international trips with Vendor executives and allowed Senior Associate Dean, Dr. Beth Mancini, to continue salaried outside employment with Vendor after learning the agreement for Dr. Mancini's services posed a conflict of interest to her duties at UTA. Dr. Karbhari also appeared to have dismissed UTA personnel complaints about the Vendor and allowed the Direct Admit program to move forward without a review of applicable rules

and policies of UTA and UTS, Texas statute, and other rules and regulations governing higher education.

Based on statements made during interviews, Dr. Karbhari's overall relationship with the Vendor has had a negative effect on morale, causing internal strife and complaints, and may have exposed UTA to potential liability and risk. At the same time, while not a violation of policy or rule, he has solicited donations from both the Vendor as an organization and its chairman (and former chief executive officer), who have donated over two million dollars while being an active vendor of UTA. As a result of its contract with UTA Vendor has been paid in excess of \$178 million over the last five (5) years.

Allegation III - Inattention to Student Success - Alleged sub-par graduation rate of students admitted for Vendor programs is purportedly "ignored" by CONHI Senior Associate Dean.

Finding: *Unable to Determine*

Applicable Rules:

Regents' Rule 40303: Admissions Procedures for U.T. Institutions

Multiple staff interviewed stated that numerous students were enrolled into UTA via Direct Admit and did not meet the criteria for admission into the College of Nursing and Health Innovation ("CONHI"), the sole purpose why they sought enrollment into UTA. Despite numerous requests, UTA was unable to provide reliable statistical data for 2018 in order to allow Protiviti to review the Direct Admit program enrollment, admissions, graduation and dropout rates and percentages of students admitted into the Nursing program.

As a result, Protiviti was unable to determine whether Dean Mancini and/or senior leadership at the CONHI "ignored," intentionally or otherwise, student graduation rates.

Allegation IV - Improper Financial Relationship - CONHI Senior Associate Dean allegedly has an "improper financial relationship" with Vendor.

Finding: *Substantiated / Policy Violation*

Applicable Rules:

Regents' Rule 30104: Conflicts of Interest, Conflict of Commitment, and Outside Activities

UTA Policy EI-PO2: Conflicts of Interest, Conflict of Commitment, and Outside Activities

UTA Policy EI-PR1: Ethics and Standards of Conduct

Dr. Mary Beth Mancini, the Senior Associate Dean named in the complaint, improperly provided consulting services to Vendor. Her services outside of her responsibilities to UTA were performed for several years without a written agreement in place but became official in December 2016 as a

result of an agreement created by Vendor and signed by a former school official. This agreement was deemed to be invalid by university officials, as the former school official did not have signatory authority on behalf of UTA. A review of the agreement itself revealed responsibilities assigned to Dr. Mancini that are de facto conflicts of interests to her role on campus. Per the agreement, Dr. Mancini was to perform several duties “outside of the scope of her position at UTA.” These included:

- Attending meetings and conference calls as a resource person, including international meetings and conference calls;
- Meeting with (Vendor) business development staff and the staff of other universities interested in potentially pursuing online learning initiatives;
- Engaging in developmental and innovation discussions with members of the (Vendor) executive team during weekends and outside normal business hours and which address matters other than those pertaining to the University;
- Providing expertise on the healthcare environment, new product lines and regulations; and
- Responding to other requests, as able.

All expenses associated with these services were paid for by Vendor, such as travel and lodging, and in many instances, reimbursement was made directly to Dr. Mancini rather than through UTA. For the services of Dr. Mancini, as written into the agreement, UTA was compensated \$72,000 per year. From the \$72,000, UTA compensated Dr. Mancini \$60,000. This compensation was in addition to her base salary at UTA. Prior to the agreement, Dr. Mancini was paid directly by the Vendor.

Any outside employment must be reported through the UTA outside activity portal. In this instance, Dr. Mancini’s role with Vendor was not disclosed through the portal nor discussed with the UTA compliance department. Dr. Karbhari and other high level UTA officials were made aware of the agreement sometime after its creation but allowed it to continue.

Dr. Mancini also engaged in another paid consulting role, one also not disclosed to Compliance via the outside activity portal, in addition to an unpaid advisory board role with an organization owned by Vendor named in the original complaint.

Allegation V - Fraudulent or Non-compliant Financial Aid Practices - UTA allegedly engages in “student/scholarship violations” related to Vendor programs.

Finding: Unsubstantiated

Applicable Rules:

UT System Regents’ Rule 40303: Admissions Procedures for U.T. Institutions

From the limited information available, a review of the “scholarship program” revealed that Vendor offers a \$500 “scholarship” to students who sign up to attend UTA. According to the UTA admissions office, this amount is then reimbursed by Vendor to UTA to be credited to the student’s account for tuition balance. Since this scholarship program was run by Vendor, Protiviti was not able to review records associated with what was being termed a scholarship program. However, according to interviews with admissions staff at UTA, labeling it as a scholarship appeared to confuse students at times.

Background

On January 9, 2019, the Texas State Auditor's Office ("SAO") received a complaint via their web-based Fraud, Waste, or Abuse hotline about The University of Texas at Arlington ("UTA"), its senior staff, and the role of a vendor on campus.

On February 7, 2019, a second email alleging similar issues was sent to multiple individuals within UTA and The University of Texas System ("UTS").

The two complaints appear to have been authored by the same individual(s). Each makes the following similar accusations:

- A vendor to the University has been given improper access to the Office of Admissions at UTA;
- A senior official at UTA has an improper financial relationship with this vendor;
- UTA, with pressure from vendor, has created a program called "direct admission,"¹ wherein students are accepted into UTA without full diligence of their credentials, the primary reason being to inflate enrollment and growth figures, and are unlikely to graduate because of being academically underqualified;
- The vendor has been granted access to offices within UTA, where they have made improper offers to UTA officials, and have been given inappropriate access to UTA admissions databases; and
- The vendor offers "scholarships" to students as incentive to enroll at UTA, but mischaracterizes the reward intentionally, and secures reimbursement from UTA for the monies paid.

Protiviti, in conjunction with the UT System Audit Office, extracted the following areas to explore in review of these complaints. They are ordered by level of relative potential significance:

Allegation I - Unfair/Lax Admissions Process for Online Students -- Potentially underqualified students are allegedly admitted to online programs managed by Vendor without thorough review, through "direct admission."

Allegation II - UTA Officials Inappropriately Influenced by Vendor – Admission processes, and decisions and actions by UTA officials, are alleged to be significantly influenced by Vendor executives.

Allegation III - Inattention to Student Success – Alleged sub-par graduation rate of students admitted for Vendor programs is purportedly "ignored" by CONHI Senior Associate Dean.

Allegation IV - Improper Financial Relationship – CONHI Senior Associate Dean allegedly has an "improper financial relationship" with Vendor.

Allegation V - Fraudulent or Non-compliant Financial Aid Practices – UTA allegedly engages in "student/scholarship violations" related to Vendor programs.

¹ While the program is referred to as "Direct Admission" in the complaint, the program was consistently referred to as "Direct Admit" in emails and witness interviews.

Contractual History between Vendor and UTA

The relationship between UTA and the Vendor began with a Service and License Agreement executed on February 7, 2008. On November 16, 2011, UTS entered into a Master Online Education Services Agreement with Vendor (the "Master Agreement") which superseded the February 2008 agreement. This contract established the overall rules by which Vendor and UT institutions could engage. The Master Agreement did not specify any particular business/programs/courses to be undertaken; all specific initiatives were to be executed as Addendums.

On March 12, 2012, UTA entered into an Online Education Services Agreement, a five-year contract with Vendor which contained an automated renewal for an additional five years. This agreement with Vendor is an arrangement for revenue sharing of tuition paid by students enrolled in UTA online courses.

Significant monies have been paid to Vendor for their services (see payment schedule below for the most recent years of the contractual agreement). Students for UTA's largest degree programs, the online registered nurse to bachelor's degree ("RN-BSN") and registered nurse to master's degree ("RN-MSN") at CONHI are recruited by Vendor, and their applications and enrollment processed collaboratively by UTA and Vendor.

Payments Made to Vendor by fiscal year:

	Total Paid by Year
Fiscal year 2015	\$30,530,508
Fiscal year 2016	\$32,748,899
Fiscal year 2017	\$46,893,570
Fiscal year 2018	\$49,819,573
Fiscal year 2019 (through 12/31/2018)	\$18,633,061
Total	\$178,625,611

Source: UTA accounting system transactional data provided by interviewee during the course of this investigation.

As a result of the foregoing complaints, Protiviti was engaged by the UT System Audit Office to provide an external review and investigation of the allegations made in the complaints.

Protiviti Engagement and Methodology

Based on the claims made in the anonymous complaints, Protiviti and the UT System Audit Office agreed upon the following investigative scope:

- Examine financial relationships between institution employees and Vendor;
- Gain an understanding of admissions acceptance standards, practices, and actions for students admitted through services provided by Vendor;
- Review the role of Vendor in influencing and performing institution operations;
- Understand "scholarships" offered by Vendor;

- Determine metrics regarding success expectations and monitoring practices for students provided services by the Vendor; and
- Investigate any other issues directly related to these matters that may arise during the investigation.

Procedures Performed

The procedures performed by Protiviti were requested by the UT System Audit Office to assist in investigating and determining the validity of the anonymous complaints received by the University. The UT System Audit Office is solely responsible for assessing the reasonableness of the procedures performed and whether the work has been sufficient for these purposes. UTS acknowledges and agrees that Protiviti is not a law firm and is not providing legal advice or analysis.

The scope of work and investigative procedures performed included:

- Review all contracts and addendums between UTA and Vendor;
- Review all relevant prior audits conducted by UTS and UTA;
- Conduct due diligence/background reviews on all relevant personnel and Vendor;
- Review emails of all relevant personnel using multiple methodologies;
- Review travel and expense records for all relevant personnel;
- Review outside activity disclosures filed by all relevant personnel;
- Review of payroll records for relevant personnel;
- Interview all relevant personnel;
- Collect, review and analyze sample statistical and transactional data and metrics related to the admittance, academic success, and graduation rate of students in which the Vendor played any role or association.

Rules and Policies

The following rules, regulations and policies were identified and deemed relevant to this investigation and the underlying allegations. UT System Board of Regents' Rules and Regulations ("Regents' Rules") and UT Systemwide policies ("UTS [#]") govern conduct at all UT System institutions and UT System Administration.

Family Educational Rights and Privacy Act ("FERPA") – 20 U.S.C. §1232g; 34 CFR Part 99

Texas Administrative Code, Chapter 4, Subchapter P, RULE §4.261-2 - Standards and Criteria for Distance Education Programs

Regents' Rule 20205: Expenditures for Travel and Entertainment by Chief Administrators and for the Maintenance of University Residences

Regents' Rule 30104: Conflicts of Interest, Conflict of Commitment, and Outside Activities

Regents' Rule 40303: Admissions Procedures for U.T. Institutions

UTS 189: Institutional Conflicts of Interest

UTS 191: Travel Guidance for Presidents and Their Spouses

UTA Policy EI-PO2: Conflicts of Interest, Conflict of Commitment, and Outside Activities

UTA Policy EI-PR1: Ethics and Standards of Conduct

SACS COC: The Principles of Accreditation

THECB: Principles of Good Practice for Degrees and Courses Offered Electronically

Interviews Conducted

The primary objective of Protiviti's interviews was to understand the specific duties and responsibilities of each individual and identify their knowledge of or involvement (if any) with the listed allegations.

Protiviti conducted interviews and follow-up discussion (when necessary) with ten (10) UTA personnel, four (4) UTS personnel, and two (2) Vendor personnel. Interview participants included personnel who had substantive knowledge of UTA rules, policies and procedures, the professional relationship between UTA and Vendor, enrollment and admissions policies and procedures at UTA, fundraising policy and procedures at UTA, compliance and audit policies of UTA/UTS and/or the subjects named in the complaint.

Findings

The following observations and findings are those of Protiviti, based on interviews and documentary evidence reviewed and gathered during the course of this investigation.

Protiviti's investigation has yielded evidence which substantiate a number of the allegations set forth in the anonymous complaints filed with both the State Auditor's Office and UTS. Each allegation will be addressed individually, as listed above in order of relative significance.

Allegation I - Unfair/Lax Admissions Process for Online Students - Potentially underqualified students are allegedly admitted to online programs managed by Vendor without thorough review through "direct admission."

Protiviti interviewed several officials from the UTA Office of Admissions, data analytics staff, the [REDACTED], Dr. Karbhari, Dr. Mancini, and members of executive leadership at the Vendor.

According to the majority of interviewees, the Direct Admit program was designed and implemented to grow admissions at UTA by recruiting and admitting a greater number of online students to the RN to BSN program. Other witnesses added that the program was designed with the intent to secure qualified students who would not tolerate inordinate delays and seek admission elsewhere. Applicants would be given provisional student status at UTA without having to provide all supporting documentation that would normally accompany an application for admission. In addition, students

admitted under Direct Admit would be allowed to take some courses at UTA before a deadline to provide the required documentation. This information is described on the UTA/Vendor's website.² The interviewees also added that Direct Admit was first introduced to the admissions officers as a temporary measure designed to boost admissions but was made permanent in the months following.

According to UTA records and interviews, students who sought to qualify for and subsequently attend the RN to BSN program under the Direct Admit program were conditionally enrolled into UTA without being required to immediately provide all supporting documentation to validate their academic credentials. UTA assumed underlying credentials would be valid because of the verification of an RN license number included on the enrollment application. These students were exclusively students recruited by Vendor for the online program and were allowed to defer providing documents such as diplomas and transcripts until a later date. Admittance into the nursing school would not be made until all documents were provided and reviewed to determine whether the student was qualified. The rationale offered by interviewees in support for this program was that, because the incoming student was a transfer, i.e. being enrolled as a registered nurse ("RN") seeking a bachelor's degree ("BSN"), an assumption was made as to the existence of the student's underlying academic credentials. As such, a student applying to UTA under the Direct Admit program was allowed to enroll at UTA, pay tuition and take up to four courses in furtherance of admission to the nursing school without having to produce all documentational support of his or her candidacy for the nursing program.

According to staff, if the student failed to supply UTA with the required documentation at the time of completion of the four courses taken, the student would be separated from the University or an academic hold would be placed on the student's application.³ Data for 2018 regarding how many students had been dropped from the program was requested but not received. Testimonial evidence indicated that students did enroll but were later dropped for not meeting admission requirements.

In order to assess the implementation and potential success or failure of the Direct Admit program, Protiviti interviewed multiple university officials, reviewed emails, and attempted to review statistical data regarding UTA's enrollment and admissions through Direct Admit.

Interviews

Interviews of UTA staff revealed there were a number of University officials who were supportive of the Direct Admit program, including President Vistasp Karbhari. During his interview with Protiviti, Dr. Karbhari said the program was a creation of CONHI, and when asked whether the direct admit policy was written anywhere and whether he had knowledge that it in fact actually exists in writing, Dr. Karbhari responded, "should be."⁴ He added that Direct Admit was designed to maximize enrollment by allowing transfer students to begin coursework prior to the review of their transfer credits and application materials. It was Dr. Karbhari's position that this policy ensured that the "best students" are not "lost" and "decide to go somewhere else. So, the process is to take a student who is qualified and get them in quicker."

² <http://www.uta.edu/conhi/students/wao/rn-bsn/rn-bsn-faq.php>

³ <http://www.uta.edu/conhi/students/wao/rn-bsn/rn-bsn-faq.php>

⁴ Protiviti requested this written policy from Dr. Karbhari but none was provided.

When asked about the difference in admission requirements for online students versus on-campus students, Dr. Karbhari acknowledged the different rules for admission but responded, “[w]e need to do everything fast in any case and put the onus on technology for the delays in document retrieval.”

While not required, Dr. Karbhari acknowledged that neither the UTA legal department nor compliance department were consulted on the Direct Admit program prior to its implementation to advise on any applicable regulations or policies. When asked why, he said, “[a]s long as we follow those admissions standards, we should be okay. So, we're not changing our standards. We're not saying that we're going to take people who are not qualified. As long as we follow those, we should be fine. And the goal is that we trust the people who are doing all the work for us. Our admissions people who have the final say on whether they're admitted or not.”

In response to the suggestion that UTA could face exposure over the differing requirements in online versus on-campus admissions and the potential ramifications of enrolling a student who was unqualified, allowed the student to pay tuition and take multiple courses and then face separation from UTA, Dr. Karbhari acknowledged the concern, but argued that the student would be at fault for providing false information, and said, “[t]here has to be truth in advertising. If we tell a student that they are at risk if they tell us something that doesn't come true, then we should be fine. If we don't tell the student, I would agree we're doing something totally wrong.”

Dr. Mancini, Senior Associate Dean for CONHI, was also interviewed. She reportedly played a significant role in the design and implementation of Direct Admit along with executives of Vendor with whom she was meeting on a weekly basis. She was also working privately for Vendor under an agreement later determined by the UTA Chief Legal Officer to be invalid and a direct conflict to her official duties at UTA (addressed in Allegation IV).

In her interview, Dr. Mancini stated Direct Admit was designed to help online students seeking admission, whom UTA “knew” had a nursing license and transfer credits. She said other universities also had programs similar to Direct Admit. She indicated that, as long as the applicant had an RN license, it implied the applicant had the requisite graduation, courses and credits to provide for enrollment into UTA and then admission into CONHI.

Dr. Mancini described the Direct Admit program as successful and transparent for the student. When asked how many students were separated as a result of failing to provide the underlying admission documents, she responded, “[V]ery few and I've run those numbers before, I just don't remember them.” She said that data is reviewed at UTA periodically for the Direct Admit program and offered to provide those reports to Protiviti.⁵

Admissions staff offered some differing statements about the Direct Admit program in their interviews. ██████████ spoke mostly positively of the program, saying that, “[T]hrough Direct Admit, we allow people to take that first course that we wouldn't otherwise have allowed...it seems kind of crazy to keep that person from starting.” He/she added that the program was a “good idea” because it gave students the opportunity to take general pre-requisite courses while they finished the application process for CONHI.

The employee further stated that he/she did not personally track the success rate, employment rate or any other student metrics for the Direct Admit program. He/she acknowledged responsibility for

⁵ Statistical documents for the Direct Admit program were never provided to Protiviti.

initiating Direct Admit in consultation with the nursing program after determining it was a “process that met all our standards and the standards established by the American Association of College Registrars.” He/she recognized some drawbacks saying that, “...we are aware of the vulnerabilities that this program brings to the University and if that causes more difficulties and it causes students to have strife, then we're going to go back to the initial policy of having all the documents in place before they can begin taking courses.” He/she deemed its success as “okay” thus far.

During discussion about the notion that students were being provisionally enrolled into UTA under Direct Admit and possibly later not able to qualify for admission into the RN to BSN program or not finish the cohort and were taking student loans and financial aid for those initial courses, the senior admissions leader told Protiviti,

“This issue is akin to what was happening at the trade schools where they were signing people up, and issuing student loans, but the students never finished the program. I have professional concerns based on everything I read and know about student behavior. These students often have to borrow significantly just to get their RNs. You can't help but wonder if some of them don't finish simply because they don't have any available funds remaining. So, they are taking out even more loans which they have no means to repay. The probability that a student defaults on their loans, and the implications this would have on their financial situation is something that is always on my mind. The last thing I want is for our university to be associated with any of the types of issues encountered by the trade schools. I believe that this program is close to crossing that line.”

His/her reasoning for Direct Admit was very similar to that of Dr. Karbhari – they both stated that Direct Admit did not result in lowered standards for admission, and each respectively advocated that Direct Admit was necessary to recruit top applicants who would otherwise be deterred and enroll at different universities if they were made to wait for an admissions decision.

Other UTA staff raised a number of concerns during interviews as to why they believed the Direct Admit program was flawed from its inception, and its potential for significant negative exposure to UTA. One staff member first spoke about the differing requirements of online (Vendor) students versus on-campus students, identifying the different deadlines (as discussed above) for underlying application documentation support. Noting the deadline for on-campus students is prior to the taking of any courses, the staff member said in reference to the online student, “[B]asically, you're admitting a student and taking their money without any guarantee that they will be accepted into the nursing program,” and went on to describe instances of students failing to qualify for the RN to BSN program after being enrolled into the University.

The staff member added that even after the Direct Admit student application clears the admissions office for enrollment into UTA, it goes to CONHI to determine if any transfer credits will satisfy the BSN required curriculum for admission into the nursing program. This is a significant part of the process since all of the students in the RN to BSN program are transfer students. If the student provided the required documentation prior to enrollment, some of their credits may not transfer thereby disqualifying them for admission into CONHI.

This staff member went on to say that while Direct Admit was created in response to declining enrollments, it was only to be temporary and limited to a certain group for a certain time frame. But that quickly changed, and the policy became permanent. The staff member said UTA Admissions

agreed to and instituted a record number of rolling semester start and end dates (reportedly 26 start dates, 34 end dates), all designed to admit more and more students. This created financial aid processing and compliance risks that took additional time to resolve.

This staff member told Protiviti that at some point the staff member brought these concerns about Direct Admit to the attention of Dr. Karbhari during an enrollment strategy meeting. The staff member said, “[W]e specifically talked about Direct Admit. I commented that if we were to go through with it, we’d be admitting (sic) students that we may find out after the fact are not admissible.” This employee said Dr. Karbhari responded by acknowledging the concern(s), but allegedly said he was only concerned with the enrollment numbers because the University “gets funding based on the number of students that we report.”

Emails

After completion of interviews, email evidence was reviewed.

Corroborating some interviewees’ statements, the emails reviewed by Protiviti largely support that Direct Admit’s primary goal appeared to be meeting admissions enrollment targets with limited emphasis on the quality of the candidates and their suitability for admission. For instance, on one occasion in a reply to an email from Dr. Karbhari, an executive at Vendor reassured him that the Vendor team continued to work closely with UTA admissions staff to maximize enrollments through August 2018. The Vendor attributed credit to the Direct Admit program for a recent improvement in the enrollment numbers.^(Exhibit 2, 3)

Other emails, many with Dr. Karbhari being either sender or recipient, suggested that the growth of admissions was of high focus. For example, emails show Dr. Karbhari closely monitored historical ratios and took an active role in the process. He gave specific instructions as to what actions were required to increase ratios that did not indicate growth^(Exhibit 4), and in another instance, he stated it would be extremely problematic if projections were not met as these numbers were needed to “stay afloat.”^(Exhibit 5)

In another chain of emails from July 2017, Dr. Karbhari emailed an executive at Vendor to discuss decreasing registration numbers and a lowering of admission standards in an effort to raise student population at UTA. Dr. Karbhari queried if there were specific reasons for the decrease in registration for programs in another UTA college serviced by Vendor, and what could be done to raise those numbers. Dr. Karbhari then advised Vendor of a reduction in GPA requirement, to which Vendor asked whether registration deadlines could be extended for those programs “in view of the new GPA requirements in order to increase enrollments.”^(Exhibit 6)

Dr. Karbhari was candid with Protiviti about the veracity of certain metrics, recognizing that they could be perceived as presenting a better picture than the reality of the current situation which was low admission-to-graduation ratios. Dr. Karbhari attributed this to students who are part time or who intentionally delay finishing their education for a variety of personal reasons.

In addition to the emails involving Dr. Karbhari, other emails showed communications in which admissions staff and the ██████████ questioned the Direct Admit policy and changes in admission policies at UTA.^(Exhibits 7, 8, 9, 10, 11)

In an email from [REDACTED] to Dr. Karbhari in November 2018, he/she cited that the Direct Admit process was leaving very little time to evaluate transcripts. He/she further stated that processing times are going up and “negative downstream” customer service and administrative burdens are increasing. He/she further stated that this was introducing some academic, financial aid and enrollment risks. This email was in the context of seeking additional resources to evaluate transcripts which was approved. He/she further informed Dr. Karbhari in the email that “this admission process is not common even at big online universities such as Arizona State and Southern New Hampshire. It is very uncommon for universities to let students enroll without their academic documents upfront. This process causes downstream administrative, student success and customer service affects (sic).”^(Exhibit 12)

Emails written by University executives also raised similar concerns about the Direct Admit program. An email from April 2018 showed two high level UTA executives expressing their concern that “wires had been crossed” between the applicant population pre-designated as “Direct Admit” and the ordinary students seeking admission at UTA. One of the executives explained that the [REDACTED] was worried that the Direct Admit process was discouraging total enrollment. “[I]n short, if a student knows direct admit is happening, but the student isn’t direct admitted, that student won’t enroll with UTA at all because the student doesn’t see a pathway.”^(Exhibit 9) The same executive went on to say in that email that the Direct Admit program was not being advertised in part due to the risk to the enrollment of on-campus students should they find out that their online counterparts were being admitted without the same level of scrutiny.

In addition to reviewing its design and implementation, Protiviti attempted to review the analytical data of the Direct Admit program for 2018 to be able to provide an objective view of its execution. However, multiple requests for data about Direct Admit program outcomes for provisional admissions were made, but no useful data was provided. For instance, the last request was made on June 14, 2019 to UTA’s Office of University Analytics. The information provided in response to that request was described as, “*Direct admits defined as those students who were activated in a program that did not submit a traditional application for admission to UT-Arlington. Student progress is tracked up to and including degree conferral. Students who have no enrollment for more than one calendar year are labeled as Inactive/Dropped Out.*”

After analysis of this data, Protiviti determined that the total applicants “enrolled,” “graduated,” and “inactive/dropped out” were provided for calendar years 2006 through 2019, which based on all information available about the inception date of Direct Admit, would have been inaccurate.

For validation purposes, Protiviti shared the data response with admissions staff, who confirmed this data set did not accurately depict provisional enrollment, admissions, graduation and dropout statistics associated with CONHI.

Conclusion

This allegation is **Substantiated / Policy Violation**.

- The Direct Admit program applies lesser enrollment procedural requirements to students seeking to enroll in the online programs referenced in the allegations.
- UTA implemented the Direct Admit program without required prior approval of the UT System Board of Regents or advisory review by UTA or UTS compliance and legal counsel.

The differing requirements for admissions at UTA for on-campus versus online students appear to violate Texas Administrative Code, Chapter 4, Subchapter P, RULE §4.261-2 - Standards and Criteria for Distance Education Programs, which states in relevant portion:

(6) Institutions shall require that students (except for students in out-of-country programs) enrolled in a distance education degree program satisfy the same requirements for admission to the institution and the program as required of regular on-campus students. Students in degree programs to be offered collaboratively shall meet the admission standards of their home institution.

The inconsistency in admission requirements potentially negatively impacts graduation rates when unqualified applicants withdraw or are denied admission to the nursing program, thereby potentially violating UT System Regents' Rule 40303: Admissions Procedures for U.T. Institutions, which states in relevant portion:

Sec. 1 Policy. It is the policy of The University of Texas System Board of Regents that U. T. institutions implement admissions policies and establish admissions criteria and processes in a manner that is as fair and transparent as possible to ensure that integrity in the admissions process is upheld.

Section 10 of Rule 40303 is also implicated:

Sec. 10 - Board Approval. Except as specifically provided in this Rule, Board approval is required for initial admissions and scholarship award policies and any subsequent amendments. Such approval shall be made following administrative review and approval by the appropriate Executive Vice Chancellor for inclusion in the institutional catalog(s).

Interviewees told Protiviti that the Direct Admit program has resulted in students enrolled into UTA only to be denied admission to CONHI, which may implicate financial aid issues and reputational concerns. We could not validate further the extent of this claim beyond the interviews and emails and a few examples that we were shown because we could not get the reliable enrollment and admissions data for the program.

Nevertheless, viewing all of the information available in the aggregate, the Direct Admit program implemented at UTA appears to violate both Texas state code and UTS Regents' rules and appears to be a significant departure from the normal policies and procedures that govern admissions at colleges and universities. Moreover, reliable data could not be produced to allow Protiviti to evaluate the outcome of provisionally enrolled students with respect to whether they were enrolled to UTA, then admitted to CONHI, and ultimately graduated.

In conclusion, Direct Admit in its current form poses reputational risk and potential regulatory risk.

Allegation II - UTA Officials Inappropriately Influenced by Vendor – Admission processes, and decisions and actions by UTA officials, are alleged to be significantly influenced by Vendor executives.

This allegation centered on the admissions office at UTA and the relationships among Vendor, admissions staff and executive staff at UTA.

Using the term, the “tail wagging the dog,” one admissions staff member said the Vendor has been given significant influence over the admissions department and even more so over CONHI. The majority of interviewees stated that up until August 2018 Vendor’s involvement was limited in that its role was to assist students in completing applications. That changed after the Direct Admit policy was enacted. As a result, Vendor personnel began calling the admissions office daily to ask why UTA had not processed Vendor student applications for enrollment in a timely manner and followed up their calls with emailed lists of prospective students for which the sender pressed for a rapid response.

According to the interviewees, Vendor sent multiple emails to admissions officers daily. The emails typically concerned a list of anywhere from 850 to 1,700 prospective students and were frequently based on outdated information. The interviewed employees said a significant amount of time was “wasted” because often the individuals on the list did not meet the minimum qualifications or could be enrolled, take classes, but ultimately not be admitted to CONHI because Vendor did not vet student qualifications prior to submission to UTA.

The employees said that the admissions officers did not have a choice whether to take Vendor calls, and any failure to comply with their demands for information resulted in Vendor contacting in many instances Dr. Karbhari and a “disciplinary meeting” was held with the President. The attendees for these meetings, in addition to Dr. Karbhari, were generally admissions staff, CONHI staff and Vendor executives. Meetings of this nature reportedly took place at least four or five times over one interviewee’s tenure at UTA. As noted above, President Karbhari denied meetings of this nature took place.

Multiple staff also felt Vendor’s offer to place Vendor staff within the UTA admissions office in order to help process the “backlog” was improper. One interviewee spoke extensively about frustrations with Vendor at UTA:

“The pressure of having an external party dictate how we manage our internal processes is resulting in discrepancies between established UTA admissions standards and those under the Direct Admit policy. If we were to be reviewed by our accreditation agency, this discrepancy would be problematic. We would be cited for letting campus-based RN to BSN students have different standards for admittance than the online students.”

Protiviti was also informed by interviewees that Vendor offered to reimburse UTA for admissions officers’ overtime so that applications of potential students could be processed at a faster rate. Executives at Vendor interviewed by Protiviti corroborated the offer to place staff within UTA admissions as well as the offer for the Vendor to reimburse UTA admissions staff overtime. The offer to place staff was rejected by UTA Admissions. The offer to reimburse for staff overtime was accepted.

When asked about the statements by admissions staff to Protiviti, Dr. Karbhari recalled one instance in which Vendor offered to place staff in the UTA admissions office because they were “short-staffed for a number of reasons,” and “[w]e were sitting on transfers and not being able to move them and

students were getting annoyed as was the college. And they said they could help us go through that and that's why I said it might be a good idea for that period of time, not overall." When asked if he thought it would be a conflict of interest for Vendor to offer and subsequently place their staff in UTA offices, he stated, "[d]epend(ing) on what they do, if it's just looking at things not making decisions, the decisions have to be sure. If we're sitting on stacks of data and you can get help to clear those stacks, which we might do with a graduate student or an undergrad student that's the only difference.... So, if someone who's already doing it on the other side would jump in and help for a short period of time versus going through and hiring someone, which in itself takes time and training someone by which point of time probably the cycle is done."

Email evidence also corroborated Vendor did offer both staff and overtime compensation to UTA. The Direct Admit admission staffing issue was initially communicated to Dr. Karbhari by a senior official responsible for admissions as a result of a backlog in the reviewing of transcripts. The official offered three possible solutions ranging from keeping the status quo, to approaching the Vendor to fund additional resources hired by UTA or suspending the Direct Admit program. He/she was seeking Dr. Karbhari's ideas on this issue. Dr. Karbhari responded with his approval for UTA to hire two additional resources. He further indicated that he had discussed the issue with a senior official at the Vendor and indicated that the Vendor was willing to hire two Vendor staff resources to work with UTA Admissions. The senior official in admissions responded that he/she would have to further discuss the offer to have Vendor staff working in UTA Admissions with legal and HR. Our interviews revealed that this offer was ultimately rejected by the admissions department because of conflict of interest reasons.^(Exhibit 12)

On the issue of adversarial contact between UTA and Vendor staff, Dr. Karbhari denied the existence of any disciplinary meetings with Admission staff but acknowledged that he had queried in the past of all parties why they were not working together effectively. He also denied the idea that the Vendor was issuing instructions as to UTA operations, but said in the past, he has offered instruction to admissions leadership to "look at issues within the College of Nursing" but again denied the Vendor's role as anything other than advisory. He added that if admissions staff had ever brought their concerns to him about Vendor's involvement in their day to day operations, it happened "[o]nce or twice but not more than that and my answer has always been we'll tell them to push off or let me know and I'll tell them not to."

In order to determine the full scope of the relationship between Dr. Karbhari and Vendor and its staff, a limited review was undertaken by Protiviti of Dr. Karbhari's travel history and email correspondence in an effort to determine whether the relationship raised any concerns. Three primary areas were identified which raised the question whether Dr. Karbhari maintained an "arms-length" relationship with the vendor:

- Interaction
- Travel
- Fundraising

Interaction

It was evident from both the majority of interviewees and relevant emails that Dr. Karbhari was UTA's primary point of contact with senior leadership at the Vendor for professional services, with no indication that Dr. Karbhari was transitioning away from being primary point person with Vendor.

As stated throughout this report, others at UTA had significant operational contact and interaction with Vendor personnel in the day-to-day business.

When asked about his direct relationship with the Vendor, Dr. Karbhari said his primary contact was the chairman (then chief executive officer) whom he described as a major vendor. "He is a donor and a member of the advisory board. He is a well-known person in the Dallas community." Asked if he was a friend, Dr. Karbhari responded, "In many ways. A close friend, no. Friend, yes. As I have lots of other friends." He denied any other personal relationships with Vendor executives.

Emails show that Dr. Karbhari did maintain a personal relationship with the chairman of Vendor. On several occasions he was invited and sometimes attended meetings or social events with the chairman of the Vendor.^(Exhibit 13) These invitations included meetings with officials of other universities, at times at the home of the Vendor chairman, and at times inviting travel to other locations. It was not clear from the emails as to the purpose of the meetings.

Travel

A review of Dr. Karbhari's expenses and travel shows multiple international trips. The majority are to India, but two trips were for travel with the chairman of Vendor to Bogota, Colombia in September 2014, and Morocco in November 2016.

In response to questions about these trips, the president acknowledged that he took both trips with the Vendor's chairman and potentially other staff members of Vendor. He characterized both trips as University business, and said the goal was to try and expand the student population at UTA from countries not previously targeted for academia. He said he sought permission for both trips from UTS as required by policy, but said, "probably not" when asked whether he discussed these trips with UTA legal counsel or his compliance department to see if there were any issues or conflicts of interest.

The [REDACTED] for UTA recalled however that the trip to Morocco was brought to his attention and the [REDACTED] said it was recommended that Dr. Karbhari not travel with executive(s) of Vendor.

Fundraising

The Vendor's chairman and the Vendor organization have donated in excess of \$2 million to UTA. Some of those monies were for an endowed Chair while others appear to be direct donations.

In his interview, Dr. Karbhari was asked about the ethics of soliciting monies from one of UTA's largest vendors who then also became a significant donor(s). Although soliciting donations from large vendors is not a violation of rule or policy unless involved in an open procurement solicitation, donations from Vendor could be perceived as improper since their contract was renewed and renegotiated every other year. However, Dr. Karbhari said he had "no concerns" about soliciting monies from the Vendor or its chairman because UTA made the solicitation and it was "run through System as well." He said, "I mean we solicit gifts from just about everybody we can. And the reality at the end of it is when we solicit gifts like this, we specifically ask for them as endowments and for chairs and professors because the one rule that is they're sacrosanct in an endowment is that there can be no benefit to the person who is giving the gift. Neither can they be involved in the final selection of who fills that chair."

Dr. Karbhari disagreed with the notion that an improper perception could be inferred from the solicitation of monies from a current vendor. His response to that was “[W]ell, then we shouldn't be asking for gifts from anybody.” When offered the idea that donations could be solicited from persons or entities not engaged in multi-million-dollar contracts with the University, the president reiterated that this particular endowment was run through UTS and approved. He also said that “every single gift that we get, endowment and non-endowment, goes through System.”

In a statement to Protiviti, the UT System ██████████ said that solicitations involving namings, real estate, stocks, and estates and trusts are required to be coordinated in advance as part of the Systemwide centralized function that administers and reviews all endowment agreements. Campuses do not need advance authorization from UTS to solicit an endowment and UTS reviews the draft endowment agreement after the campus has secured a gift commitment, and that is when UTS engages in endowment administration compliance afterward.

The ██████████ had no recollection of any discussion with Dr. Karbhari about any donations or endowments involving executives at Vendor and the Vendor itself. The ██████████ also noted that there is no policy or regulation in place prohibiting donations from current vendors, except those involved in open procurement solicitations.

Conclusion

This allegation is **Substantiated / Policy Violation**.

- UTA personnel appear to feel significantly influenced by Vendor personnel in admissions decisions and admissions policymaking.
- Dr. Karbhari traveled either with Vendor or at Vendor's expense on several occasions, and some trips were not submitted to UTS for pre-approval as required by policy or to legal or compliance for advice on potential policy, rule, or ethical implications.
- Vendor was allowed to reimburse overtime to compensate admissions personnel.
- University donations were solicited from Vendor and its chairman without regard to what could be perceived as a conflict of interest or the appearance of a conflict. This appeared to be done in compliance with UTS policy.

Of the two foreign trips taken by Dr. Karbhari, his trip to Bogota was in violation of UT System Regents' Rule 20205: Expenditures for Travel and Entertainment by Chief Administrators and for the Maintenance of University Residences. Rule 20205, states in relevant portion:

Sec. 3 Travel Expenditures. All expenditures for travel by a chief administrator or his or her spouse must be for a business purpose of the U. T. System or the institution and must comply with all laws and policies of the institution and the U. T. System. All foreign travel must be approved in advance by the Chairman of the Board of Regents for the Chancellor and spouse and by the appropriate Executive Vice Chancellor for the presidents and spouses. Requests for approval of foreign travel must include a specific business purpose and an estimate of funds to be expended by U. T. System or by the institution.

This trip by Dr. Karbhari was not pre-authorized. Rather, an inconsistent request was made “after the fact” seeking reimbursement to the Vendor for the President's airfare, who according to the email

paid for his own lodging and parking. The email also stated that it was not believed initially that there would be any reimbursable expenses on the trip further muddying the reason behind the trip in the first place.^(Exhibit 14)

On several other occasions, Dr. Karbhari sought prior approval to travel internationally. He did not, however, seek prior approval when travelling with Vendor. Although not an explicit violation of policy, traveling for University business to Morocco or Colombia with a current major vendor of the university appears to be abnormal on its face, and while President Karbhari maintained the trip was for university business, there was email evidence that the one trip was originally not to be reimbursed.

Many of the allegations in the original anonymous complaint and those raised during interviews related to the actions and decision-making of Dr. Karbhari and his close relationship with the Vendor's leadership team. Vendor's role on campus appears to extend beyond that of traditional vendor/customer relationship in which the lines of University business and Vendor business have blurred to the point where interviewees at all levels indicated that the Vendor had influence over University business and admissions decisions in particular. The Vendor is part of weekly meetings on campus and plays a large role in determining policies and procedures at UTA, all with the UTA President's endorsement. All internal complaints about Vendor to date appear to have been deflected and largely ignored.

Based on the evidence reviewed, however, there are stark differences between UTA leadership's view of the professional relationship with Vendor and senior staff within UTA, specifically the admissions office. Admissions staff view their professional relationship with Vendor in a very negative light while Dr. Karbhari views the UTA-Vendor relationship as highly successful and beneficial to the University.

In conclusion, the evidence collected and analyzed in the course of the investigation appears to largely corroborate that Vendor has significant access to UTA departments and officials and that the relationship between Vendor and UTA is not "arm's length."

With respect to other parts of the allegations, Vendor's access to an admissions database is contractual - per the "First Amendment and Restatement of Online Education Services Agreement-Order between VENDOR and The University of Texas at Arlington." In this contract, the Vendor was explicitly authorized to receive "certain agreed upon data" from UTA's student information and learning management systems. The signed agreement includes a provision for protection of student information under FERPA and states that UTA "designates [Vendor] as a school official with a legitimate education interest...."

Insofar as the Vendor contract with UTA designates Vendor as a school official with a legitimate education interest, it appears Vendor access to student data was permissible and in accordance with FERPA.

In addition, no policy at UTA or UTS restricts the solicitation or receipt of donations from people or companies doing business with the University. However, UTS has different policies and procedures in place than UTA. UTS submits a request (and receipt) for donation through a series of checks and balances to ensure the solicitation/donation complies with UTS standards and guidelines. UTA does not, according to Dr. Karbhari and UTA's [REDACTED], have any policy in place for vetting of solicitations or donations. This has resulted in a large vendor of UTA who has now

donated significant monies to the University, paid for the University president to travel internationally on at least one occasion, and indirectly paid at least one other university official \$60,000 a year in outside income (addressed in Allegation IV). It is reasonable to say that this could cause external parties to conclude that this relationship and business courtesies are inappropriate and potentially unlawful.

UTA officials also accepted overtime monies from Vendor to help pay overtime for admissions staff. This was verified by UTA, and again raises possible conflict of interest queries as to why monies were accepted

Viewing all of the available information in the aggregate, when coupled with the fact that interviewed staff said Dr. Karbhari frequently aligned with Vendor when conflict arose, and he reportedly admonished admissions staff and executives with Vendor personnel present, it is reasonable to conclude that UTA's president has fostered a negative culture in which a vendor is afforded courtesy and unfettered access to University personnel and business records, while employees and UTA executives are marginalized and claim to be disciplined if they are construed by Vendor or UTA leadership to be uncooperative or unhelpful.

In summary, senior UTA officials have allowed a vendor and its staff to supersede and marginalize admissions staff and executives.

Allegation III - Inattention to Student Success - Sub-par graduation rate of students admitted for Vendor programs is allegedly "ignored" by CONHI Senior Associate Dean.

Protiviti undertook a review to determine whether data being reported publicly about the number of provisional students enrolling both at the University and subsequently into the CONHI was accurate. Despite dedicating significant time and hours towards this aspect of the review, Protiviti was not provided with sufficient information to complete the analysis.

With regard to Direct Admit, Protiviti specifically requested data for 2018 that showed how many provisional students were enrolled into UTA under the Direct Admit program, and subsequently were admitted into and successfully completed the CONHI RN to BSN program or, in the alternative, ultimately did not enter and complete the program. All requests for data for this purpose during the investigation were either returned incomplete, non-responsive, or inconsistent. This is consistent with statements to Protiviti from UTS officials who spoke of their frustrations with UTA's inability to provide reliable data in the past on multiple occasions when requested.

In Texas, public universities are provided financial support from the Texas Higher Education Coordinating Board ("THECB"). THECB is responsible for the academic integrity of all public colleges and universities in Texas and provides oversight and allocates funding based on an established formula requiring sets of metrics. The more favorable the metrics, the greater the funding.⁶

Emails show Dr. Karbhari paid close attention to the data reported to THECB. For instance, in a communication to executives and the Vendor on August 1, 2018, he said, "[A]t this point, the critical data are those related to THECB counts since those are the ones used by the State and System in

⁶ See <http://www.thecb.state.tx.us/>, Formula Funding

assessing funding and attainment of enrollment targets. Online students outside the state do not count and if the THECB [...] targets are not reached the numbers that are non-[Coordinating Board-reported] would actually work against us since it would be taken that we are not meeting the mission of first serving the state.”(Exhibit 3) The implication is that Dr. Karbhari was conscious of the data being reported to THECB as well as the potential negative consequence(s) UTA could face in terms of funding should it be determined that information reported was unreliable or inaccurate.

Dr. Karbhari emailed Protiviti feedback about his interview and topics that were discussed. He provided two attachments to his email to support his position that the online nursing programs were highly successful, emphasizing graduation rates for the Texas nursing shortage reduction program graduates and a presentation from the state of Texas showing the nursing graduation rate to be 93% in 2018, the highest of any state school. This was very positive but did not solely focus on the Direct Admit students which was the data we were looking for.

In summary, Dr. Karbhari raised the following issues:

- He believed he had not violated rules by soliciting funds from the Vendor and asked that Protiviti discuss the matter with staff at UTS;
- While he acknowledged Vendor had access to student records, he indicated that was a part of their contract with UTA which provided FERPA protection, and it was necessary for Vendor to have that access to meet their obligations under the contract;
- He denied the existence of any disciplinary meetings with his attendance, admissions staff, and vendor staff; and
- He made the following statement: “Finally, one of your concerns was the size of the enrollment in the College of Nursing and its significant increase over the years. During a time when universities in Texas and across the country are struggling to enroll students and there are critical needs in the workforce, I’m mystified why this is viewed negatively. However, if I remember correctly your concern was that the number of students enrolled had caused decreases in student success and low graduation rates. I wanted to forward to you two recent reports from the Texas Higher Education Coordinating Board (THECB) they sent us on 5/29. As you will see from the attachments to this email UTA's graduation rate under the Nursing Shortage Reduction Program (the program put together by the State to substantially increase the number of Nursing Graduates to address the shortage of qualified professionals in the workforce) as calculated by THECB is 93% which is the highest of all State universities.”

Conclusion

We were **Unable to Determine** whether or not this allegation is substantiated.

Protiviti could not definitively validate or invalidate allegations of inattention to student success because, in short, data integrity could not be established in 2018 for provisional student admission completion data provided by UTA during the investigation.

There is information, as discussed above seen in emails however, that growing online enrollment as quickly as possible through the partnership with Vendor was the primary focus of UTA senior officials. UTA senior officials also indicated concerns with downstream student success.

Staff reported to Protiviti that numerous students enrolled into UTA via Direct Admit did not meet the criteria for admission to CONHI, the reason why they applied to UTA. The implementation of Direct Admit is, on its face and by the words of senior officials, a policy primarily designed to get students into UTA before they apply to another institution. Email evidence has shown that on at least one occasion, the assumption that the applicant has the necessary qualifications to continue education at UTA was flawed because at least one student lied on his application and no vetting of the information was done prior or simultaneous to admission at UTA. Because we could not attain any further data on the population of students in the Direct Admit program for 2018, we were unable to definitively conclude on this allegation.

Allegation IV - Improper Financial Relationship – CONHI Senior Associate Dean allegedly has an “improper financial relationship” with Vendor.

This allegation centered on Dr. Beth Mancini, Senior Associate Dean for CONHI. First, a review of Dr. Mancini’s payroll history revealed that, in addition to her base salary, she also received additional monies, the majority being from teaching various courses at UTA, but some for “course development” for UTA/Vendor.⁷

Second, emails contain information about an additional financial relationship between Dr. Mancini and Vendor, the most significant being a purported contract for Dr. Mancini’s services dated December 20, 2016 between UTA and Vendor. Signatories to the agreement were the former Dean of Nursing at CONHI and the chairman (then CEO) of Vendor.^(Exhibit 1) Dr. Mancini was not a signatory to the agreement. In UTA’s response to our draft report, UTA informed us that this contract was originally presented to the [REDACTED] for signature. The [REDACTED] informed the Vendor that the Dean needed to sign-off on the contract. Even though the Dean did not have signature authority for the contract and according to UTA [REDACTED], was told prior to execution to this agreement that she did not have the authority to be a signatory to this agreement, UTA believes that does not invalidate the contract.

Services to be provided by Dr. Mancini to Vendor as listed in the agreement included:

- Attending meetings and conference calls as a resource person, including international meetings and conference calls;
- Meeting with (Vendor) business development staff and the staff of other universities interested in potentially pursuing online learning initiatives;
- Engaging in developmental and innovation discussions with members of the (Vendor) executive team during weekends and outside normal business hours and which address matters other than those pertaining to the university;
- Providing expertise on the healthcare environment, new product lines and regulations; and
- Responding to other requests, as able.^(Exhibit 1)

The agreement – validated by Dr. Mancini and the UTA [REDACTED] in their respective interviews as to its authenticity – contained language that in exchange for consulting services provided by Dr. Mancini to Vendor, UTA would receive an annual payment of seventy-two thousand dollars (\$72,000). Not included in this agreement was any mention of payment directly or indirectly to Dr. Mancini for the above described services.^(Exhibit 1)

⁷ Source: Payroll data and discussion with interviewee during course of this investigation.

Despite the lack of an additional written agreement, emails documented that \$60,000 of the \$72,000 Vendor paid to UTA was eventually paid to Dr. Mancini at the rate of \$5,000 per month. Other emails between Dr. Mancini and UTA officials confirmed the existence of an agreement between UTA and Dr. Mancini and the form of payment.^(Exhibit 15)

In her interview, Dr. Mancini was shown a copy of this agreement between Vendor and UTA. She acknowledged its existence and confirmed the copy was authentic and its provisions an accurate depiction of the arrangement between the parties. She stated that she received payments in years prior to any written agreement for similar services and was paid directly by the Vendor. She acknowledged her additional sources of income aside from her base salary at UTA and when asked what her responsibilities were in furtherance of this agreement, she stated that she provided “nursing expertise consultation,” which she explained was “[H]elping their people understand nursing in a global context.” In furtherance of these goals and at Vendor’s instruction, she stated that over the years she, in addition to traditional consulting, had spoken at conferences both domestically and internationally at Vendor’s behest. For this work, she denied receiving any additional pay or honorariums for her services other than her University pay but acknowledged receiving multiple reimbursements for travel.

Dr. Mancini confirmed that, while the university was compensated \$72,000 for her services annually, she was compensated \$5,000 a month for her work. Explaining the discrepancy between the amounts, she said that the remaining \$12,000 was retained by UTA, referring to it as a “Dean’s Tax.”

This agreement between UTA and Vendor was not reported by Dr. Mancini through the UTA outside activity portal or discussed with UTA compliance staff or legal counsel, which according to UTA compliance staff, would have been appropriate. Both Dr. Karbhari and UTA’s ██████████ said they became aware of Dr. Mancini’s arrangement with the Vendor well after its execution and stated they knew the agreement between UTA and Vendor was not signed by a person with authority. Despite this determination, and the fact that Dr. Mancini did not make appropriate notifications or disclose this outside income to UTA through the outside activity reporting portal, both Dr. Karbhari and the ██████████ allowed the agreement to remain in place, saying they believed the contents of the agreement did not constitute conflicts of interest as it was “explained” to them. The work continued by Dr. Mancini on behalf of Vendor, and payments to Dr. Mancini continued.

Two other outside activities for Dr. Mancini were also discovered during the course of this investigation. Dr. Mancini was providing paid consulting services to a second vendor who, according to its website, is a private organization which provides consulting services to several different companies and/or clients.^(Exhibit 16) Dr. Mancini also serves on the advisory board of a private, for-profit online college focused on education, healthcare, and nursing, which is currently owned by the Vendor chairman.

Dr. Mancini confirmed the latter activity on the advisory board. This activity was also not disclosed to UTA via its outside activity portal. According to Dr. Mancini, this position is unpaid.

With regards to the consulting services employment, Dr. Mancini said she did not recall this company despite the fact that she had been in email contact with and directly paid by them within the five months prior to this investigation.

Conclusion

This allegation is **Substantiated / Policy Violation**.

- Dr. Mancini receives compensation from Vendor, through University payroll, for services performed for the exclusive benefit of Vendor.
- Dr. Mancini did not report potential or actual conflicts of interest posed by her outside employment, as required. Employees cannot enter into outside employment agreements without obtaining approval from their supervisors and reporting via the Outside Activity Portal.
- A contract was signed by a UTA official who was not authorized to be a signatory on behalf of UTA.

Based on emails, documents, and statements, it is clear that Dr. Mancini has a financial relationship with Vendor. As such, her conduct is in violation of UTA Policy Ethics and Standards of Conduct EI-PR1, which states that an employee of UTA may not have a financial relationship with a vendor of the university. The relevant policy is excerpted below:

Ethics and Standards of Conduct EI-PR1

Employees of the University of Texas at Arlington may not have a direct or indirect interest, financial or otherwise, in a corporation or business, engaging in a professional activity, or incurring an obligation of any nature that is in substantial conflict with or might reasonably tend to influence the performance of their official duties at UT Arlington.

Employees shall furnish in a timely manner such written disclosures (direct or indirect interest) as may be required by state and federal authorities, UT System or University requirements. All employees are required to complete the Outside Employment and Outside Board Service Form annually.

Employees shall not accept other outside employment or dual employment or compensation that could reasonably be expected to impair the employee's independence of judgment in the performance of the employee's public duties.

An employee must not solicit, accept, or agree to accept any benefit from a person the employee knows may have a business relationship with UT Arlington or UT System except as permitted under Texas Penal Code Section 36.10 (emphasis added).

Also implicated is Regents' Rule 30104, which states in relevant portion:

Sec. 7 Separation of Activities. If a U. T. System Administration or U. T. institution employee engages in any outside activity, the employee must make it clear to those who employ him or her that the work is unofficial and that the name of the U. T. System or any U. T. institution is not in any way to be connected with the employee's name, except for identification purposes in a way that avoids the appearance of endorsement or support by U. T. System or any U. T. institution. No employee engaged in outside activities shall use in connection

therewith the official stationery of the System, give as a business address any building or department of the U. T. System or any of the institutions, or any University telephone extension.

Dr. Mancini failed to disclose her relationships to UTA with Vendor, the other consulting company and her Board work, as required under UTA's outside employment and conflicts of interest disclosure requirements.

Moreover, a review of the contract between Vendor and UTA shows Dr. Mancini's consulting services to be a conflict of interest with her duties at UTA. The contract clearly states that the responsibilities within the agreement are outside of her position at UTA and in many instances only serve to further the interests of Vendor.

In addition to the agreement representing a conflict of interest, executive staff at the University were aware of the agreement. They also were aware that Dr. Mancini was providing services to Vendor under the agreement but maintain the position that the conduct was not a conflict of interest, and as such, while having this information and the authority to void the agreement, senior UTA officials allowed the agreement to continue.

Allegation V - Fraudulent or Non-compliant Financial Aid Practices – UTA allegedly engages in “student/scholarship violations” related to Vendor programs.

From the limited information available, a review of the “scholarship program” revealed that Vendor offers a \$500 “scholarship” to students who sign up to attend UTA. According to the UTA admissions office, this amount is then reimbursed by Vendor to UTA to be credited to the student's account for tuition balance.

Conclusion

This allegation is **unsubstantiated**.

Although limited information is available since this “scholarship” program was run by Vendor, Protiviti did not identify any clear “violations” of scholarship rules. Protiviti was not able to review records associated with what was being termed a “scholarship program” but is essentially a rebate. However, by labeling it as a “scholarship,” this appeared to confuse students at times, according to admissions staff at UTA.

Appendix A

Exhibits



December 20, 2016

Dean Anne Bavier
College of Nursing and Health Innovation
411 S. Nedderman Dr.
Arlington, Texas 76019

Re: Dr. Beth Mancini Consultative Services

Dear Dean Bavier:

This Letter Agreement (**Agreement**) confirms our mutual understanding that Academic Partnerships, LLC (**AP**) will provide payments to the University of Texas at Arlington (**UTA**) in exchange for consulting services provided by Dr. Beth Mancini, the Sr. Associate Dean for Education Innovation at the College of Nursing and Healthcare Innovation at UTA (**Dr. Mancini**), and is effective as of the date first written above (**Effective Date**).

As background, AP and UTA entered into the Online Education Services Agreement – Order on March 12, 2012 (the **Order**) whereby AP provides certain services to UTA related to the Online Programs identified therein. In furtherance of that partnership, and in a consultative manner to AP, Dr. Mancini performs several duties outside of the scope of her position at UTA. This includes, among other duties:

- Attending meetings and conference calls as a resource person, including international meetings and conference calls.
- Meeting with AP business development staff and the staff of other universities interested in potentially pursuing online learning initiatives.
- Engaging in developmental and innovation discussions with members of the AP executive team during weekends and outside of normal business hours and which address matters other than those pertaining to the University.
- Providing expertise on the healthcare environment, new product lines and regulations.
- Responding to other requests, as able.

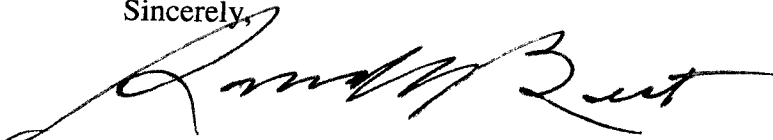
AP shall remit to UTA an annualized total of \$72,000 to be provided to UT Arlington College of Nursing and Health Innovation as consideration for Dr. Mancini performing the above mentioned duties. AP shall make equal, \$24,000 payments to UTA every 120 days, in arrears. This Agreement begins on the Effective Date and continues for

Dean Anne Bavier
December 20, 2016
Page 2

a period of one year, and the Agreement automatically renews for additional one year periods unless either party gives ninety days' written notice of non-renewal before the end of the then current term. Additionally, either AP or UTA may terminate this Agreement by providing ninety days' written notice to the other. Should this Agreement be terminated early, AP shall pay UTA a prorated amount based on the duration since the previous payment.

If you are agreeable to the above terms, please indicate your agreement by signing below and returning to AP.

Sincerely,



Randy Best
Chairman

Effective 1 September 2016.

Acknowledged and agreed to:



Dean Anne Bavier
Dean, College of Nursing and Health Innovation
The University of Texas at Arlington

12/20/16
Date

From: [Mancini, Mary E](#)
To: [REDACTED]
Subject: Re: Enrollment
Date: Thursday, July 12, 2018 7:03:28 AM

Given this email, I'm wondering if it would be best for me to wait until you have the meeting today before I send an email -- once you let me know of the outcome of that meeting, let me know results and if you think I should still send the mail.

From: [REDACTED] >
Sent: Wednesday, July 11, 2018 9:57 PM
To: Mancini, Mary E
Subject: FW: Enrollment

Just saw this was stuck in my outbox from last night...forwarding to you as an fyi.

[REDACTED]

From: [REDACTED] >
Date: Tuesday, July 10, 2018 at 10:37 PM
To: "Karbhari, Vistasp" <vkarbhari@uta.edu>, [REDACTED] >
Cc: [REDACTED] >
Subject: Re: Enrollment

Dear Dr. Karbhari,

I have been working with [REDACTED] and his team diligently to maximize August enrollments. This Thursday, July 12th, I along with representatives from Academic Partnerships Enrollment Management, Strategy & Analysis and Partner Support will be meeting with [REDACTED] and Candice Calhoun-Butts/UTA to once again align on applications being processed and timeframes for admittance. The AP team has several lists of applicants that, per our view from the UTA data file, if processed could increase enrollment quickly. I have continuously updated Beth Mancini in this regard and will be providing her the same information. I will update you on the exact discussion points and resolutions on Thursday afternoon subsequent to the meeting.

Please rest assured that there is great intensity and a sense of urgency at AP around August enrollment. It is at the forefront of all enrollment discussions and reiterated on a daily basis by [REDACTED] to the team. Not only are there strategic meetings daily, AP continues to invest heavily in digital, field and traditional marketing, as well as, email & phone campaigns to active and inactive applicants and overtime by all members of the functional teams supporting UTA at this critical time. Processing all such applicants by the university will be vital to increase August enrollments and assure student satisfaction. I will be in touch after our Thursday meeting.

Warm regards,

[REDACTED]

From: "Karbhari, Vistasp" <vkarbhari@uta.edu>

Date: Tuesday, July 10, 2018 at 9:14 PM

To: [REDACTED]

[REDACTED] >

Cc: "Karbhari, Vistasp" <vkarbhari@uta.edu>, [REDACTED] >

Subject: Enrollment

Dear [REDACTED]:

Our enrollment for Fall of TX based students is still behind last year's level. The latest numbers show that we are behind on head count by 403 students resulting from a deficit of 553 at the undergrad level, a deficit of 36 at the post-bac level and a gain of 186 at the graduate level. In terms of credit hours we are also behind significantly at the undergraduate level.

This is of concern since a lack of growth at the THECB level will result in a decrease in state funding since this is a counting year. Could you please brief me on steps being taken to address this issue since it has serious consequences for UTA if we remain behind.

Regards

Vistasp

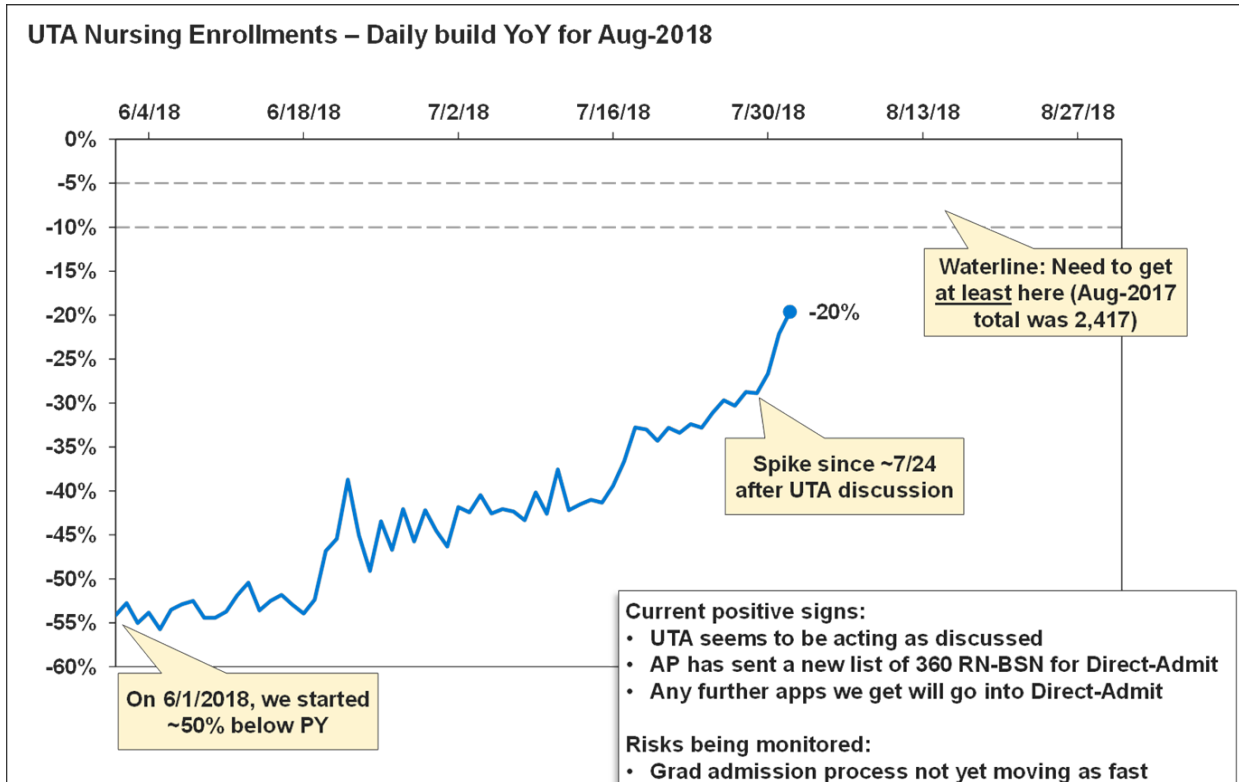
From: [REDACTED]
To: Karbhari_Vistasp
Cc: [Randy Best](mailto:Randy_Best); [REDACTED]
Subject: FW: Fall Registration Data
Date: Thursday, August 2, 2018 6:29:14 AM
Attachments: [image001.png](#)

Dear Dr. Karbhari,

Thank you for this information which I will share with the team. As we discussed, we will ensure that the AP team continues to work closely with the UTA team to maximize enrollments through August. Per the summary chart below which I received last night the trends have greatly improved since the meeting at UTA and the directives provided in relation to "Direct Admit" and process improvement. I will continue to monitor closely on a daily basis and keep you informed as we discussed yesterday.

Warm regards,

[REDACTED]



From: Karbhari, Vistasp [mailto:vkarbhari@uta.edu]
Sent: Wednesday, August 1, 2018 9:57 PM
To: Randy Best <RBest@bestassociates.com>; [REDACTED] >
Cc: Karbhari, Vistasp <vkarbhari@uta.edu>
Subject: FW: Fall Registration Data

Dear Randy and [REDACTED]

I'm attaching three files that show progression of data to date re registration. Please note that at this point the critical data are those related to THECB counts since those are the ones used by the State and System in assessing funding and attainment of enrollment targets. Online students outside the state do not count and if the THECB (marked as "CB Reported" in the files) targets are not reached the numbers that are non CB would actually work against us since it would be taken that we are not meeting the mission of first serving the state.

The three files are as follows

1. Daily registrations SCH – this shows the progression of registration by headcount. Lower division is Freshmen and Sophomore, Upped Division is Junior and Senior
2. Daily registration_Students: This shows registration progression by headcount
3. Overview – this shows a comparison by year for reference. You can see in this chart each year's census level total, the VERY conservative targets set for this year and how far BEHIND we are currently of even these conservative targets.

I hope these help in assessing the situation and tracking progress as well as in determining steps that must be taken over the next few days to ensure that we hit targets. I recognize that a lot of work is already being done but cannot emphasize enough the importance of hitting and exceeding the

very conservative targets given the present situation. Please do not hesitate to contact me if you need any clarifications or have any questions.

Regards
Vistasp

From: [Karbhari, Vistasp](#)
To: [REDACTED] [Wasson, Wallace](#)
Cc: [Adem, Salma A](#)
Subject: RE: Some numbers
Date: Saturday, September 26, 2015 2:05:00 PM

Dear [REDACTED]
I think we do that for degrees but the opposite for enrollment...
Regards
Vistasp

From: [REDACTED]
Sent: Friday, September 25, 2015 9:39 AM
To: Karbhari, Vistasp
Cc: Adem, Salma A
Subject: Re: Some numbers

We will verify. For most CB counts that I am aware of, no, Summer numbers collapse into the previous/completing academic year, until a cutoff point in August that hinges on end of Summer classes/finals. We then stack AP starts right after that cutoff to maximize Fall enrollment.

On Fri, Sep 25, 2015 at 9:18 AM, Karbhari, Vistasp <vkarbhari@uta.edu> wrote:
From an IPEDS and THECB perspective don't we count summer numbers in the succeeding fall? If so we might want to hold that for consistency.

Sent from my iPhone

On Sep 25, 2015, at 9:08 AM, [REDACTED] wrote:

Vistasp, clarifying question highlighted below on the data cut for this request. I recommend we place cut at end of Summer to also give us AY framework cleanly.

[REDACTED]

----- Forwarded message -----

From: O'Hare, Dennis <ohare@uta.edu><<mailto:ohare@uta.edu>>>
Date: Fri, Sep 25, 2015 at 9:05 AM
Subject: RE: Some numbers
To: "Stewart, James W" <jstewart@uta.edu><<mailto:jstewart@uta.edu>>>
Cc: [REDACTED]

Here's the snippet from his request:

“last three academic years picking a specific point in time – end of Spring semester for example.”

I read that as pull the global academic year headcount as of end of Spring. Do we include or exclude Summer semesters? If so, we are basically pulling the whole academic year. I want to make sure that I'm cutting the data correctly. Coding is done on this...just need this bit of clarification.

Thanks,

DENNIS O'HARE Business Intelligence Analyst
Center for Distance Education
The University of Texas at Arlington
Box 19027
Arlington, TX 76019-0027
[817.272.7490](tel:817.272.7490)<tel:[817.272.7490](tel:817.272.7490)>

ohare@uta.edu<mailto:ohare@uta.edu><mailto:ohare@uta.edu><mailto:ohare@uta.edu>>

Confidentiality Notice: This e-mail and any files transmitted with it may contain confidential or privileged information that is intended only for the use of the individual or entity to whom they are addressed. This information should be treated with the appropriate level of security to preclude the disclosure of sensitive or privileged information. If you are not the intended recipient, you are hereby advised that any disclosure, copying, distribution, or the taking of any action in reliance on the contents of this information is prohibited. If you have received this e-mail in error, please notify the sender, delete this e-mail from your machine's memory, and destroy the hardcopy information.

Data Recipient Notice: Data files and/or statistics generated by the Center for Distance Education includes all in-state, out-of-state, and international student registrations in sessions that began any time within the specified time period. Counts may be higher than those reported to the Texas Higher Education Coordinating Board, due to CB rules about reporting enrollments of out-of-state students taking only online classes, and rules about the timing of reporting classes that begin after census day of a particular semester.

From: Stewart, James W
Sent: Friday, September 25, 2015 8:39 AM
To: O'Hare, Dennis
Cc: [REDACTED]
Subject: Re: Some numbers

I read as pick a cut off as stating point. Better Wait for [REDACTED] reply

James Stewart

On Sep 25, 2015, at 8:33 AM, O'Hare, Dennis <ohare@uta.edu<mailto:ohare@uta.edu>>> wrote:


Well, if I were to pull just academic year without a cut point consideration as the president has asked for, Summers would be included.

DENNIS O'HARE Business Intelligence Analyst
Center for Distance Education
The University of Texas at Arlington
Box 19027
Arlington, TX 76019-0027
[817.272.7490](tel:817.272.7490)<tel:[817.272.7490](tel:817.272.7490)>

ohare@uta.edu<mailto:ohare@uta.edu><mailto:ohare@uta.edu><mailto:ohare@uta.edu>>

Confidentiality Notice: This e-mail and any files transmitted with it may contain confidential or privileged information that is intended only for the use of the individual or entity to whom they are addressed. This information should be treated with the appropriate level of security to preclude the disclosure of sensitive or privileged information. If you are not the intended recipient, you are hereby advised that any disclosure, copying, distribution, or the taking of any action in reliance on the contents of this information is prohibited. If you have received this e-mail in error, please notify the sender, delete this e-mail from your machine's memory, and destroy the hardcopy information.

Data Recipient Notice: Data files and/or statistics generated by the Center for Distance Education includes all in-state, out-of-state, and international student registrations in sessions that began any time within the specified time period. Counts may be higher than those reported to the Texas Higher Education Coordinating Board, due to CB rules about reporting enrollments of out-of-state students taking only online classes, and rules about the timing of reporting classes that begin after census day of a particular semester.

From: Stewart, James W
Sent: Friday, September 25, 2015 8:28 AM
To: O'Hare, Dennis
Cc: 
Subject: Re: Some numbers

I also think to include summers

James Stewart

On Sep 25, 2015, at 8:26 AM, O'Hare, Dennis <ohare@uta.edu<mailto:ohare@uta.edu>>> wrote:

I'm confused by part a. He's asking for academic year data but references a term point. So, if I were to interpret his request...it would be distinct global headcount data by academic year over Fall and Spring terms...if we were to use his suggestion of the Spring cut point. Am I correct? Please let me know and I will get cooking on this.

Thank you.

DENNIS O'HARE Business Intelligence Analyst
Center for Distance Education
The University of Texas at Arlington
Box 19027
Arlington, TX 76019-0027

[817.272.7490](tel:817.272.7490)<tel:[817.272.7490](tel:817.272.7490)>

ohare@uta.edu<mailto:ohare@uta.edu><mailto:ohare@uta.edu<mailto:ohare@uta.edu>>

Confidentiality Notice: This e-mail and any files transmitted with it may contain confidential or privileged information that is intended only for the use of the individual or entity to whom they are addressed. This information should be treated with the appropriate level of security to preclude the disclosure of sensitive or privileged information. If you are not the intended recipient, you are hereby advised that any disclosure, copying, distribution, or the taking of any action in reliance on the contents of this information is prohibited. If you have received this e-mail in error, please notify the sender, delete this e-mail from your machine's memory, and destroy the hardcopy information.

Data Recipient Notice: Data files and/or statistics generated by the Center for Distance Education includes all in-state, out-of-state, and international student registrations in sessions that began any time within the specified time period. Counts may be higher than those reported to the Texas Higher Education Coordinating Board, due to CB rules about reporting enrollments of out-of-state students taking only online classes, and rules about the timing of reporting classes that begin after census day of a particular semester.

From: [REDACTED] >]
Sent: Friday, September 25, 2015 8:21 AM
To: Stewart, James W; O'Hare, Dennis; [REDACTED]
Subject: Fwd: Some numbers

By EoB today request from President

----- Forwarded message -----
From: Karbhari, Vistasp <vkarbhari@uta.edu<mailto:vkarbhari@uta.edu><mailto:vkarbhari@uta.edu<mailto:vkarbhari@uta.edu>>>>
Date: Friday, September 25, 2015
Subject: Some numbers
To: [REDACTED] >>>

Dear [REDACTED]
Would it be possible for you to send me the following numbers by COB today

- a) Degree seeking global student headcount total and by College for the last three academic years picking a specific point in time – end of Spring semester for example. We will need to keep the combination of Kinesiology and Nursing and SUPA and Architecture in mind please
- b) Same as (a) but broken into Bachelors, Masters, Doctoral
- c) Total number of fully online degrees today with titles
- d) Total number of courses (not sections) offered online by semester for the last three years (or two is 3 is not possible) by College

Thanks a lot
Vistasp

--

[Redacted]

Division of Digital Teaching and Learning
University of Texas Arlington

[Redacted]

Box 19027, Arlington, TX 76019-0027

[Redacted]

--

[Redacted]

Division of Digital Teaching and Learning
University of Texas Arlington

[Redacted]

Box 19027, Arlington, TX 76019-0027

[Redacted]

<winmail.dat>

--

[Redacted]

Professor of University Studies
Division of Digital Teaching and Learning
University of Texas Arlington

[Redacted]

Box 19027, Arlington, TX 76019-0027

[Redacted]

From: [Karbhari, Vistasp](#)
To: [Lim, Teik C](#); [REDACTED]; [Aswath, Pranesh B](#); [REDACTED]; [Purgason, Ashley M](#); [Davis, Kelly O](#)
Cc: [Demurat, Joanna Roseanne](#); [Karbhari, Vistasp](#); [Adem, Salma](#); [Corral, Elsa](#)
Subject: Fall 2018 Targets
Date: Monday, May 7, 2018 6:00:47 AM
Attachments: [Updated Enrollment Targets Fall 2018 - Data Handbook.xlsx](#)

Dear Colleagues:

I assume that Fall 2018 targets have already been discussed between Teik, [REDACTED] and Ashley in general. I thought it might be good to put numbers to paper so that we can all see where we need to be and thus assess what needs to be done. I'm attaching a spreadsheet based on data that has been developed very carefully by Joanna and her team. A big THANK YOU to them for this.

Columns A-Y are historical

Targets for Fall 2018 are shown in Columns AA-AC rows 3-11 and comments can be found in columns AM-AR. Please note that some of these targets are VERY low due to an assumption that we will just maintain last year's numbers at the graduate level. I note that even this is EXTREMELY problematic both from an enrollment view point given that this is a COUNTING Year and from the perspective of further going in the hole for future years. For us to stay afloat we need a Fall 2018 population of about 44,168.

SCH per head targets are shown as an example in columns AA and AB, rows 37 and 38

I note that our ratios of AP to non-AP are all going up and this needs to be slowed down dramatically. Obviously we need more face to face students to enable this. I should emphasize that SSW numbers which are largely online and generated almost independently by SSW (i.e. the University including Enrollment Mgmt. is really not involved much in recruitment here) is largely online so the AP to non-AP ratio is actually misleading in terms of online to face-to-face with our online population being much higher than might be suggested by AP numbers.

The higher % of AP and lower grad numbers will cause significant financial distress so we need to revisit these when we meet

I have not updated the financial part but initial guestimates taking into account rough estimates of scholarships indicates that we may NOT be hitting our targets at these numbers and may have to cut expenditures across UTA to stay even – this is a concern since this will be a HUGE issue.

I am requesting that [REDACTED] compare the targets here to the ones he has in his mind and we go over those when we meet

In addition retention of continuing students will be a top priority as will increase in SCH/head during Fall and Spring and it would be good to get estimates from Teik and Ashley when we meet on these.

I have not checked my schedule but expect that Elsa has either set a meeting for us this week or will be doing so.

I look forward to our discussion and to working together to hit targets

Please do not hesitate to email me or drop by if you need any clarifications on the spread sheet
Regards
Vistasp

From: [REDACTED]
To: [Karbhari, Vistasp](#); [Randy Best](#)
Subject: RE: COEd Registration
Date: Monday, July 3, 2017 10:38:45 AM
Attachments: [image001.png](#)

Thank you – this is excellent news Dr. Karbhari as in relation to the GPA.

I have reviewed the Education numbers with Becky Berry last week and she will be working with the COE to determine if the registration deadline for the August start dates could be extended in view of the new GPA requirements in order to increase enrollments.

We will keep you updated.

Warm regards,

[REDACTED]

From: Karbhari, Vistasp [mailto:vkarbhari@uta.edu]
Sent: Monday, July 3, 2017 10:31 AM
To: [REDACTED]; Randy Best <RBest@bestassociates.com>
Cc: Karbhari, Vistasp <vkarbhari@uta.edu>
Subject: FW: COEd Registration

Dear [REDACTED] and Randy:

FYI – just wanted to make sure you knew about the reduction in GPA requirement.

Also – I wanted to touch base on the decrease in registration and find out if there were specific reasons for this and what could be done to bring them back up.

Regards

Vistasp

From: Karbhari, Vistasp
Sent: Monday, July 03, 2017 10:12 AM
To: Doughty, Teresa Taber, PhD <teresa.doughty@uta.edu>
Cc: Elsenbaumer, Ronald L <elsenbmr@uta.edu>; Karbhari, Vistasp <vkarbhari@uta.edu>
Subject: RE: COEd Registration

Dear Teresa:

Thank you

Regards

Vistasp

From: Doughty, Teresa Taber, PhD
Sent: Friday, June 30, 2017 1:39 PM

To: Karbhari, Vistasp <vkarbhari@uta.edu>
Cc: Elsenbaumer, Ronald L <elsenbmr@uta.edu>
Subject: Re: COEd Registration

Hi Vistasp,

We've updated the website with the correct GPA for undergrads (and still needs to update the catalog). It appears that the numbers drop with our graduate enrollments (we are down 106 from this time last year). However, we are up by 18 students with undergraduate enrollments. We will continue to push to get all of these numbers higher.

Teresa Taber Doughty, PhD
Dean and Professor
College of Education
The University of Texas at Arlington
Teresa.doughty@uta.edu
817-272-3691



From: "Karbhari, Vistasp" <vkarbhari@uta.edu>
Date: Friday, June 30, 2017 at 1:19 PM
To: "Doughty, Teresa Taber, PhD" <teresa.doughty@uta.edu>
Cc: "Karbhari, Vistasp" <vkarbhari@uta.edu>, "Elsenbaumer, Ronald L" <elsenbmr@uta.edu>
Subject: COEd Registration

Dear Teresa:

In looking at registrations for Fall I noticed that CoEd registrations are far behind last year's numbers and I'd appreciate a push from the College to get these numbers up. I thought that you and Ron had agreed to drop the GPA requirement to 2.75 from 3 but the web site still shows the 3.0 level. I wonder if this is a reason for the lower than expected numbers.

I'd appreciate all that can be done to get the numbers up
Regards
Vistasp

From: [REDACTED]
To: [REDACTED]
Subject: FW: Direct Admit Candidates
Date: Thursday, September 20, 2018 11:58:42 AM

From: Calhoun-Butts, Candice L
Sent: Monday, August 20, 2018 2:03 PM
To: [REDACTED]
[REDACTED]
Subject: RE: Direct Admit Candidates

[REDACTED]

I don't recall that being part of the conversation, but it totally makes sense to move forward with this in mind. Do you want me to update AP?

Unofficial means what? Pulled from the student's account rather than like a word document correct?

Best Regards,

Candice Calhoun-Butts
Assistant Dean
Office of Enrollment and Student Services
College of Nursing and Health Innovation
T 817.272.2766



From: [REDACTED]
Sent: Monday, August 20, 2018 12:46 PM
To: Calhoun-Butts, Candice L <candicec@uta.edu>
Cc: [REDACTED]
Subject: RE: Direct Admit Candidates

Hi Candice,

[REDACTED] and I both thought that it was with unofficial transcripts. How would we be able to verify that

they would even be eligible with enough tentative transfer hours without at least an unofficial transcript?

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

From: Calhoun-Butts, Candice L
Sent: Monday, August 20, 2018 12:35 PM
To: [REDACTED]
Subject: RE: Direct Admit Candidates

[REDACTED]

We discussed only for August that students would be accepted without transcripts, but they would receive a communication regarding having a stop before continuing until the transcripts were received. After August, we would look at Direct admission- eval being completed after accepted, but that all transcripts must have been received.

I did not receive a list of students admitted this way so I wasn't sure if this was implemented??

If you have any questions, please feel free to contact me further,

Candice Calhoun-Butts
Assistant Dean
Office of Enrollment and Student Services
College of Nursing and Health Innovation
T 817.272.2766



UNIVERSITY OF
TEXAS
ARLINGTON

COLLEGE OF NURSING
AND HEALTH INNOVATION

From: [REDACTED]
Sent: Friday, August 17, 2018 4:26 PM
To: Calhoun-Butts, Candice L <candicec@uta.edu>
Subject: FW: Direct Admit Candidates

Hi Candice,

Can you remind me what Becky is thinking with Direct Admit?

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

From: [REDACTED]

Sent: Friday, August 17, 2018 4:24 PM

To: Ketelsen, Kim Lee <kim.ketelsen@uta.edu>; [REDACTED]

[REDACTED] >

Subject: RE: Direct Admit Candidates

I am trying to understand what they mean by direct admit. Admit all with a hold to get transcripts next term based on them only taking the one Nursing course in the first term?

[REDACTED]

From: Ketelsen, Kim Lee

Sent: Friday, August 17, 2018 4:23 PM

To: [REDACTED]

[REDACTED]

Subject: FW: Direct Admit Candidates

How are we handling these. I pulled up the first 5 and they are missing transcripts.

KIM KETELSEN Associate Director of Admissions

Phone: 817-272-9143

From: [REDACTED]

Sent: Friday, August 17, 2018 4:16 PM

To: [REDACTED] >; Ketelsen, Kim Lee

<kim.ketelsen@uta.edu>

Cc: [REDACTED] >; Mancini, Mary E <mancini@uta.edu>

Subject: Fwd: Direct Admit Candidates

Happy Friday everyone!

Is it September yet?? I know it has been an action-packed month and we still have a few days to go.

Dr. Karbhari sent me a note this morning with where we stand as of yesterday. I assured him we were doing everything we could to meet previous year enrollment.

From: [Calhoun-Butts, Candice L](#)
To: [Dix, Rachel Marie Spinks](#); [Polhamus, Richard E](#)
Cc: [Mccullough, Kassandra K](#)
Subject: RE: Provisional Admit With Low GPA, ID: [REDACTED]
Date: Wednesday, January 23, 2019 11:23:00 AM

Thanks so much, Rachel. I've included Richard Polhamus to review and contact the student.

Best Regards,

Candice Calhoun-Butts
Assistant Dean
Office of Enrollment and Student Services
College of Nursing and Health Innovation
T 817.272.2766



From: Dix, Rachel Marie Spinks <rachel.dix@uta.edu>
Sent: Wednesday, January 23, 2019 11:01 AM
To: Calhoun-Butts, Candice L <candicec@uta.edu>
Cc: Mccullough, Kassandra K <kassandra.mccullough@uta.edu>
Subject: Provisional Admit With Low GPA, ID: [REDACTED]

Hello Candice,

I wanted to notify you that this student, [REDACTED] who was a Provisional admit into the Fall 2018 AO RN-BSN program back on August 24, 2018, has a low calculated GPA. I noticed this student had a large amount of failing grades when I was processing her change from Provisional status to being Fully-Admitted.

I calculated out her GPA to be a [REDACTED] normally, and a [REDACTED] GPA for their last 24 hours. If they had been processed normally instead of through Provisional admittance, she wouldn't have been admitted due to her GPA not meeting Admission requirements.

In case you need to do something with this information on your side, we thought it best to share with you.

Thank you,

Rachel Dix

Transcript Evaluator II
Nursing Accelerated Online
Admissions, Records, Registration
The University of Texas at Arlington
Email: rachel.dix@uta.edu
P: (817) 272-1402

From: [Bavier, Anne R](#)
To: [Calhoun-Butts, Candice L](#); [Boyd, Jeanean B](#)
Subject: RE: Nursing pilot - direct admits
Date: Thursday, April 5, 2018 12:48:51 PM

Yes, there are some comments from others about the direct admit going to Teik, I think.

Anne

Dean and Professor
College of Nursing and Health Innovation
University of Texas at Arlington

Phone: 817-272-4793

President National League for Nursing
2015-2017

From: Calhoun-Butts, Candice L
Sent: Thursday, April 05, 2018 12:44 PM
To: Bavier, Anne R; Boyd, Jeanean B
Subject: RE: Nursing pilot - direct admits

Thanks, Anne. Your responses to Troy were spot on!

We can definitely look at the messaging, but the students not receiving the direct admit messages are still getting messages from the University to attend UTA. Were there students contacting [REDACTED] or Teik with concern regarding the direct admission?

Candice Calhoun-Butts
Assistant Dean
Office of Enrollment and Student Services
College of Nursing and Health Innovation
T 817.272.2766



From: Bavier, Anne R
Sent: Thursday, April 5, 2018 11:55 AM
To: Calhoun-Butts, Candice L <candicec@uta.edu>; Boyd, Jeanean B <jboyd@uta.edu>
Subject: FW: Nursing pilot - direct admits

██████████ will be calling a meeting about these issues. Here is how I responded to his inquiries. I am worried that somewhere in the system we are giving confusing advice about who is a direct admit.



Dean and Professor
College of Nursing and Health Innovation
University of Texas at Arlington

Phone: 817-272-4793

President National League for Nursing
2015-2017

From: Bavier, Anne R
Sent: Thursday, April 05, 2018 11:04 AM
To: ██████████
Subject: RE: Nursing pilot - direct admits

██████████

We have no contact with any applicant who is considering coming to UTA as a freshmen. These are all handled by others. I have no input or control over the messaging to these other students. So, I do not know what is happening.



Dean and Professor
College of Nursing and Health Innovation
University of Texas at Arlington

Phone: 817-272-4793

President National League for Nursing
2015-2017

From: [REDACTED]
Sent: Thursday, April 05, 2018 11:00 AM
To: Bavier, Anne R
Subject: Re: Nursing pilot - direct admits

Yes. This is key and helpful.

Do you believe that the non-direct admit students are still being encouraged to enroll at UTA and are made aware that they would be part of a robust admission opportunity, even though they were not direct admit?

On Apr 5, 2018, at 10:05 AM, Bavier, Anne R <bavier@uta.edu> wrote:

Some thoughts below. See if this helps. Also, we just sent more letters this week and are good to go for almost 100 students. We are limiting it to Presidential or Maverick Scholars.

<image001.jpg>

Dean and Professor
College of Nursing and Health Innovation
University of Texas at Arlington

Phone: 817-272-4793

President National League for Nursing
2015-2017

From: [REDACTED]
Sent: Thursday, April 05, 2018 7:43 AM
To: Bavier, Anne R
Subject: Nursing pilot - direct admits

Hello Anne,

Would you give this some thought then either write back or let's talk?

Teik is concerned that the direct admission process is discouraging total enrollment. In short, if a student knows direct admit is happening, but the student isn't direct admitted, that student won't enroll with UTA at all because the student doesn't see a pathway. Some of the question comes down to messaging to students who both are and aren't direct admitted, so that enrollment stays healthy.

The numbers are still small. About 45 in the program now. When we ask students where they are going, if not here, they have admissions to TWU. But, some are also

telling us they turned down TWU and TCU because we would direct admit and give a scholarship. We are NOT advertising the direct admit option, but opening it to those already accepted and are 'nursing intended' in their application. They get a letter and an email directly from me. It is too early to tell, but recall that our aim was to increase the caliber of the nursing students and to retain students by giving them early admission and a cohort experience in the major.

In Teik's words: If students are going elsewhere because we truly will not have seats, I am fine with it.

However, if students are going elsewhere because we have this pilot program that sets a lower limit and the students will eventually get into the program if they stick with us for a year, then I think we have a problem. We are not messaging correctly. The students admitted are the cream of the crop. We have not lowered the admission standard. They must continue to perform, in accord with the conditions of their scholarship support. Our view is that these best students are not coming here at all, because our competitors are direct admitting.

Thanks,

█

█

█

Enrollment Management

University of Texas at Arlington

█

From: [Calhoun-Butts, Candice L](#)
To: [Mccullough, Cassandra K](#)
Cc: [Ketelsen, Kim Lee](#); [Polhamus, Richard E](#)
Subject: RE: Direct Admit Question
Date: Monday, October 22, 2018 10:48:00 AM
Attachments: [image003.png](#)

Hi Kass,

They need to be denied with an option to appeal.

Best Regards,

Candice Calhoun-Butts
Assistant Dean
Office of Enrollment and Student Services
College of Nursing and Health Innovation
T 817.272.2766



From: Mccullough, Cassandra K
Sent: Monday, October 22, 2018 10:19 AM
To: Calhoun-Butts, Candice L <candicec@uta.edu>
Cc: Ketelsen, Kim Lee <kim.ketelsen@uta.edu>
Subject: Direct Admit Question

Candice,

What will the process be for AO Direct Admits that after submitting all docs are determined to be below 2.0 GPA?



Kassandra McCullough
Assistant Director, Undergraduate Admissions
Admissions, Records, & Registration
The University of Texas at Arlington
Email: kass@uta.edu
817-272-3424

From: [Calhoun-Butts, Candice L](#)
To: [Ketelsen, Kim Lee](#); [REDACTED]
Cc: [REDACTED]
Subject: RE: Direct Admit Candidates
Date: Monday, August 20, 2018 5:38:00 PM

Awesome, thanks Kim! 8:30am okay?

Candice Calhoun-Butts
Assistant Dean
Office of Enrollment and Student Services
College of Nursing and Health Innovation
T 817.272.2766



From: Ketelsen, Kim Lee
Sent: Monday, August 20, 2018 5:29 PM
To: Calhoun-Butts, Candice L <candicec@uta.edu>; [REDACTED]
[REDACTED] >; [REDACTED] >
Cc: [REDACTED]
Subject: RE: Direct Admit Candidates

Hello,

Kass and I would definitely like to touch base in the morning for this before we start.

KIM KETELSEN Associate Director of Admissions
Phone: 817-272-9143

From: Calhoun-Butts, Candice L
Sent: Monday, August 20, 2018 5:19 PM
To: [REDACTED] >; [REDACTED]
[REDACTED]
Cc: [REDACTED] >; Ketelsen, Kim Lee <kim.ketelsen@uta.edu>
Subject: RE: Direct Admit Candidates

Sounds good. Thank you!

Can Kass or [REDACTED] and I touch base in the morning to ensure we are on the same page?

[REDACTED]

I can follow up with you right after!

Best Regards,

Candice Calhoun-Butts
Assistant Dean
Office of Enrollment and Student Services
College of Nursing and Health Innovation
T 817.272.2766



From: [REDACTED]
Sent: Monday, August 20, 2018 5:09 PM
To: Calhoun-Butts, Candice L <candicec@uta.edu>; [REDACTED]
[REDACTED]
Cc: [REDACTED] Ketelsen, Kim Lee <kim.ketelsen@uta.edu>
Subject: RE: Direct Admit Candidates

We can do this – but this would be a one-time thing for this week. I have serious concerns about having different admissions processes for different populations in the same program. We could open ourselves up to some not so pleasant issues if we continue this practice for any length of time.

[REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]

From: Calhoun-Butts, Candice L
Sent: Monday, August 20, 2018 5:07 PM
To: [REDACTED] >; [REDACTED]
[REDACTED]
Cc: [REDACTED] >; Ketelsen, Kim Lee <kim.ketelsen@uta.edu>
Subject: RE: Direct Admit Candidates

[REDACTED]

This is an idea that I think could work.

The list of 385 students have incomplete documents that Kass and one other person could work this week to admit provisionally. The students have to be admitted provisionally because they have missing items, which is actually okay with me as the letter explains in detail what provisional admission means and what the student can and cannot enroll in. As a note, we will not communicate to students that they have an option to move to “regular admission” because ultimately if the student wants to wait on the eval, they can do so once all documents are in. This will save AP and Kass time not changing students back and forth. The remainder of her team can work on the evaluations. We might not hit the 31st deadline, but it may only delay a few days rather than a week or more. I am working with Richard to add a few more courses to the plan code in the event these students want to register for 9/24. I’ll send out a message as well.

I would recommend that each day we receive the list completed by Kass so that AP can call those students to enroll. [REDACTED] I’d like to provide the AP teams with bullet points to discuss if that works for you. This would allow us to control the messaging these students are receiving.

Does that work for everyone? I am happy to jump on a quick Zoom call if needed.

Best Regards,

Candice Calhoun-Butts
Assistant Dean
Office of Enrollment and Student Services
College of Nursing and Health Innovation
T 817.272.2766



From: [REDACTED]
Sent: Monday, August 20, 2018 4:26 PM
To: Calhoun-Butts, Candice L <candicec@uta.edu>; [REDACTED]
[REDACTED]
Cc: [REDACTED]; Ketelsen, Kim Lee <kim.ketelsen@uta.edu>
Subject: FW: Direct Admit Candidates

Hi Candice,

This is the list that AP has asked to be admitted as direct admits with transcripts coming later. We can do this some of this list but that will delay our ability to get the evaluations done on the recently admitted students. Are you okay with the delay or are the direct admits a higher priority?

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

From: Ketelsen, Kim Lee
Sent: Monday, August 20, 2018 4:23 PM
To: [REDACTED] >
Subject: FW: Direct Admit Candidates

Here you go.

KIM KETELSEN Associate Director of Admissions
Phone: 817-272-9143

From: [REDACTED]
Sent: Friday, August 17, 2018 4:16 PM
To: [REDACTED] Ketelsen, Kim Lee
<kim.ketelsen@uta.edu>
Cc: [REDACTED] Mancini, Mary E <mancini@uta.edu>
Subject: Fwd: Direct Admit Candidates

Happy Friday everyone!

Is it September yet?? I know it has been an action-packed month and we still have a few days to go.

Dr. Karbhari sent me a note this morning with where we stand as of yesterday. I assured him we were doing everything we could to meet previous year enrollment.

With that said, we have pulled a list (see below and attached) of applicants that appear eligible for Direct Admissions in the RN to BSN program.

I hope this helps us push towards the 27th and successfully meet the expectations of the President.

Let me know if you have any questions and THANK YOU!

[REDACTED]

Begin forwarded message:

From: Zen Chang <Zen.Chang@academicpartnerships.com>
Date: August 17, 2018 at 3:51:39 PM CDT
To: [REDACTED] >
Cc: Gigi Tippens <Gigi.Tippens@academicpartnerships.com>
Subject: Direct Admit Candidates

Hi [REDACTED]

We did as much cleaning as we could cross-referencing multiple sources and came up with 407 candidates for Direct Admit.

Would you please pipe this over to UGRD Admissions to process?

Thanks,

Zen
Partner Engagement
1-512-576-0914 | Cell

From: [REDACTED]
To: [Karbhari, Vistasp](#); [Hood, Jean M](#); [Davis, Kelly O](#)
Subject: RE: New AO Admission Process
Date: Thursday, November 15, 2018 6:22:13 PM

Dear Vistasp, Kelly and Jean,
I'm writing to update you all.

- a) Thank you Kelly, Jean and your staff for helping us get the two UTA positions posted quickly —they are posted. We will hire as quickly as possible, hopefully making offers soon after the five day period.
 - b) The AP positions are being mapped out and I'm in touch with Becky Berry. These two positions will be more complicated as we all know so we will be in touch with OIT, legal and HR to develop methods for having these positions in place to evaluate transcripts. This will be interesting to work out and I'm looking forward to it.
- [REDACTED]

From: Karbhari, Vistasp
Sent: Tuesday, November 13, 2018 8:57 AM
To: [REDACTED] >
Cc: Karbhari, Vistasp <vkarbhari@uta.edu>; Davis, Kelly O <kdavis@uta.edu>; Hood, Jean M <jmhood@uta.edu>
Subject: RE: New AO Admission Process

Dear [REDACTED]

Based on the email and our subsequent discussions as well as my discussion with Kelly, I'm writing to provide the following

- a) Approval for you to immediately hire two transcript evaluators at the TE II level which I understand from you will be at the \$39k + fringe level. Please work with Kelly and Jean to move expeditiously on this so that there are no delays on the evaluation of transcripts
- b) I've spoken to Rob Ganji and he will provide further support through evaluators that AP will hire. Please work with Becky on this. I recognize that we will need to work through the "need to know" aspects since these personnel will be AP employees. Rob assured me that they would be dedicated to UTA evaluation only. It may be good to locate them with the rest of your group. If I understood him correctly he is willing to hire at least 2 evaluators to match our two and this should give you more than the number you estimated needing.

It is my hope that this will move rapidly so that we do not lose students.

Regards
Vistasp

From: [REDACTED]
Sent: Wednesday, November 7, 2018 5:52 PM
To: Karbhari, Vistasp <vkarbhari@uta.edu>
Subject: New AO Admission Process

Dear Vistasp,

I'm writing to learn how you would like to proceed.

- In partnership with AP and CONHI we are in process of making a substantial processing change to admitting students. Early tests show there are problems with this change due to insufficient ability to evaluate transcripts quickly enough.
- This change is increasing transcript evaluation resource requirements as well as introducing some academic, financial aid and enrollment risks. In short, the reason is because this method of admitting leads to an increase in last minute decisions and evaluations that have to be immediately made once transcripts arrive in order for Direct Admit students to continue into the second term. This new process is slowing down the entire evaluation system.
- I've discussed with [REDACTED], and she agrees is that the increased processing reasonably requires three more transcript evaluators in order to avoid delays and to maximize enrollment.
- It is important to note that additional transcript evaluation resources are a smart investment because they speed up the processing of all transcripts, which is good for increasing enrollment.

At this time I see three options and you always have good ideas to consider, too, so I look forward to them.

1. Do what we can with what we have and accept that there will be some students who get documents in late that cannot register for their second session. Holds will be placed on these students. The students will be frustrated at having to handle administrative matters while in the middle of working and doing their coursework.
2. While you would know if this is feasible, I recommend asking [REDACTED] if he would be willing to fund the three positions, approximately \$140K. Hire three transcript evaluators with expectation that transcript evaluation turnaround time will be substantially decreased for all AO students. Keep Direct Admit. This is not bullet proof, however. This will not help in cases when students don't provide transcripts, but it will help process faster those that do provide them. Additional evaluators would position UTA to grow enrollment by processing faster. I would continue seeking technological solutions to transcript evaluation. I prefer this option.
3. Cancel the Direct Admit process. This admission process is not common even at big online universities such as Arizona State and Southern New Hampshire. It's very uncommon for

universities to let students enroll without their academic documents upfront. This process so causes downstream administrative, student success and customer service affects. This is not my first choice, but it is better than option 1.

Thank you for your help and advice,

██████

P.S. Here's a brief description of Direct Admit.

Being newly implemented, students don't have to present college transcripts prior to their first term of enrollment. This change is leading to an increase in the need to make last minute decisions immediately so these Direct Admit students' courses may be evaluated in time to register for their second session. These students' transcripts are arriving well into the first session, leaving very little time to evaluate transcripts and make course decisions before registration begins for the second session. Total processing times are going up and negative downstream customer service and administrative burdens are increasing.

██████████

██████████

Enrollment Management

University of Texas at Arlington

██████████

From: Karbhari, Vistasp
Sent time: 09/25/2018 07:54:06 AM
To: Corral, Elsa
Cc: Adem, Salma; Karbhari, Vistasp
Subject: RE: Trip to South Africa

Dear Elsa:

Please let them know that I will know more by mid-October since I'm awaiting details of the legislative session. In any case it would need to be after mid- March.

Regards
Vistasp

From: Corral, Elsa
Sent: Monday, September 24, 2018 10:24 AM
To: Karbhari, Vistasp <vkabhari@uta.edu>
Cc: Adem, Salma <adem@uta.edu>
Subject: FW: Trip to South Africa

See below. Please advise.

From: Katelynn Dugan <Katelynn.Dugan@academicpartnerships.com>
Sent: Friday, September 21, 2018 11:20 AM
To: Corral, Elsa <corral@uta.edu>
Subject: Trip to South Africa

Elsa,

Randy would like Dr. Karbhari to travel with him to South Africa in the Spring of 2019. Would this is possible? I know that we are a ways out but, I thought I would check with the scheduling now.

It would be a week-long trip.

Thank you!

Katelynn Thomas Dugan
Chief of Staff
Randy Best, Chairman
Justyna Dymerska, Ph.D., Executive Vice President
214-438-4123 | 214-210-7371 fax
2200 Ross Avenue, Suite 3800
Dallas, Texas 75201



From: Karbhari, Vistasp
Sent time: 09/30/2018 11:24:01 PM
To: Corral, Elsa
Cc: Adem, Salma; Karbhari, Vistasp
Subject: RE: Kenya visit with Dr. Karbhari

Dear Elsa:
Yes please – if they need upto 2 hours please go ahead
Regards
Vistasp

From: Corral, Elsa
Sent: Friday, September 28, 2018 10:36 AM
To: Karbhari, Vistasp <vkarbhari@uta.edu>
Cc: Adem, Salma <adem@uta.edu>
Subject: FW: Kenya visit with Dr. Karbhari

Please advise.

From: [REDACTED]
Sent: Friday, September 28, 2018 9:59 AM
To: Corral, Elsa <corral@uta.edu>
Subject: Kenya visit with Dr. Karbhari

Good morning, Elsa,

Randy is in the early stages of arranging travel for a university in Kenya to come to the AP offices in Dallas. He asked me to confirm if Dr. Karbhari is available November 28th to visit with the Kenya team. Does he have availability that day?

Thank you,

[REDACTED]

From: Robinson, Deborah J
Sent time: 11/16/2018 05:53:09 AM
To: Karbhari, Vistasp
Cc: Adem, Salma; LaVelle, Mark
Subject: Fwd: Introducer for Naomi Oreskes

Dear Vistasp, please see note from Mark. I would like to suggest Adrian as the back up. We would like ask her today. Getting on a plane shortly to try and get out of this mess.

Thank you,
Dee

Sent from my iPhone

Begin forwarded message:

From: "LaVelle, Mark" <mlavelle@uta.edu>
Date: November 15, 2018 at 6:51:54 PM EST
To: "Robinson, Deborah J" <deborah.robinson@uta.edu>
Cc: "Blizzard, Cecilia E." <cecilia@uta.edu>, "Youngblood, Rose" <rose.youngblood@uta.edu>
Subject: Introducer for Naomi Oreskes

Dee,

Jim Shea has not received confirmation from Davida Herzl as to her attendance at the Naomi Oreskes lecture on Tuesday. We should probably have a back-up in case she is unable to attend. Both Dean Parr and Laura Mydlarz (Biology faculty) will be attending the lecture. Will you ask the President if either of them would be acceptable?

Here is the current attendance for the dinner. I will propose tables on Monday.

Dinner Attendance (22 as of 11-12-18)

Vistasp Karbhari
Lisa Karbhari
Naomi Oreskes
Morteza Khaledi
Shahrazad Afshinpour
Meghna Tare
Teik Lim
Gina Lim
Adrian Parr (vegetarian)
Michael Zaretsky (no Pork)
Laura Mydlarz
Bradford Dimos (Mydlarz student)
Contessa Ricci (Mydlarz student) (vegetarian)
Ed Schneider
Christie Eckler
Theresa O'Donnell (guest of Adrian Parr) (vegetarian)
Duane Dimos
Cathy Dimos
Frank Alexander
Jane Alexander
Dee Robinson
Joe Carpenter

No Response Yet

Serena Connelly
Randy Best
Dan Patterson & Mary McDermott Cook

Dávida Herzl
Ed Bass
PAB Executive Committee

Mark
Mark LaVelle
Assistant Vice President for Alumni and Donor Engagement
University of Texas at Arlington
Box 19198
701 S. Nedderman
Arlington, TX .76019-0198

T 817.272.5235
F 817.272.2188



[Make a gift now by clicking here!](#)

From: /O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=084B6F244D834234BDC57FACEA1EECEB-KARBHARI
To: Corral, Elsa
Cc: Adem, Salma; Karbhari, Vistasp
Subject: RE: Dinner at Randy Best's Home - Monday, December 10th

Dear Elsa:

Per the email from Rebecca I can leave NO earlier – please book me on the earlier flight back – I think there's one at noon or thereabouts and then let Nari know that I would be glad to attend. Could you please check if it's for Lisa as well?

Regards

Vistasp

From: Corral, Elsa <corral@uta.edu>
Sent: Monday, November 26, 2018 1:44 PM
To: Karbhari, Vistasp <vkabhari@uta.edu>
Cc: Adem, Salma <adem@uta.edu>
Subject: FW: Dinner at Randy Best's Home - Monday, December 10th

You arrive from SACS at 5:49 p.m. Please advise.

From: Nari Grause <Nari.Grause@bestassociates.com>
Sent: Monday, November 26, 2018 1:37 PM
To: Corral, Elsa <corral@uta.edu>
Subject: Dinner at Randy Best's Home - Monday, December 10th

Elsa,

I hope this email finds you well and it's nice to meet you via email. I am Randy's new assistant. Randy is hosting a small dinner at his home on Monday, December 10th at 6:00pm for some international guests who are visiting from South Africa:

Santie Botha – former Chancellor of Nelson Mandela University - <https://www.alueducation.com/about/global-advisory-council/santie-botha-2/>

Dr. Derrick Swartz – former Vice Chancellor of Nelson Mandela University - <http://www.tambofoundation.org.za/trustees/derrick-swartz/>

He would like to invite Dr. Karbhari to join this dinner if he is available. Please advise and I am happy to send along a calendar invite accordingly.

Many thanks,
Nari

Nari Grause
Executive Assistant
Randy Best, Chairman
Justyna Dymerska, Ph.D., Partner
2200 Ross Avenue, Suite 3800
Dallas, TX 75201
O: 214-438-4110
M: 347-446-0048
Nari.Grause@BestAssociates.com



From: Corral, Elsa
Sent time: 02/21/2019 11:23:56 AM
To: Karbhari, Vistasp
Cc: Adem, Salma
Subject: FW: Dr. Khabari Availability

You're booked the afternoon of the 25th and in Austin the 26th. Please advise.

From: [REDACTED]
Sent: Thursday, February 21, 2019 10:22 AM
To: Corral, Elsa <corral@uta.edu>
Subject: Dr. Khabari Availability

Good morning, Elsa,

Randy has the American University of Beirut visiting Dallas next week. Does Dr. Karbhari have availability to meet with the two visitors either Monday afternoon, February 25th or Tuesday morning, February 26th? They would come to UTA. I know we are asking for a good bit of his time next week so if he is not available, no worries at all.

Many thanks,
[REDACTED]

00011829
470006

Corral, Elsa

Subject: FW: Travel exception

From: Davis, Kelly O
Sent: Thursday, October 02, 2014 12:57 PM
To: Sanders, Marcy A
Cc: Corral, Elsa
Subject: Re: Travel exception

Dear Marcy
I approve.
Kelly

From: <Sanders>, Marcy A <sanders@exchange.uta.edu>
Date: Thursday, October 2, 2014 10:55 AM
To: Kelly Davis <kdavis@uta.edu>
Cc: "Corral, Elsa" <corral@uta.edu>
Subject: RE: Travel exception

Kelly,

I did not think President would incur any reimbursable costs on the trip to Colombia with Randy Best and thus did not do a travel request ahead of the trip. However, he did pay for his own hotel room and parking at the airport. We will reimburse Best Associates for airfare. Would you please approve a travel authorization "after the fact."

Thanks!
Marcy

Marcy Sanders, Executive Associate to the President
The University of Texas at Arlington
817-272-2101 sanders@uta.edu
www.uta.edu/dna

From: [Mancini, Mary E](#)
To: [Thompson, Lalita N](#)
Subject: Re: Pay out of checks from AP per contract
Date: Sunday, March 12, 2017 12:21:24 PM
Attachments: [CONTRACT_AP_MANCINI.pdf](#)

Lalita --

Really no urgency -- just didn't want this hanging out on Sherry's desk for months on end. I had planned to be in the office tomorrow and go to RI on Tuesday afternoon (we cancelled our trip to Rome), but with the threat of a major snow storm in New England on Tuesday, we are heading out tomorrow so I will not see you this week.

Regards this arrangement, prior to fall 2016, AP used to send these checks to the Provost's office who sent them to Holly (that's what happened with the check dated 9/22). In the fall, it was decided we needed a contract rather than recurring conversations between Randy and Ron...and Anne wanted indirects on the work....so the contract was done but it took most of the semester to complete which is how we ended up where we are with two checks needing disbursement (covering services in the summer and fall of 2016). I've attached a copy of the contract as you requested.

Please let me know if you need more information.

Also hope you think the situation with the work in financial affairs is distributed in a reasonable manner. Let me know what I can do to help you in there.....

Beth

From: Thompson, Lalita N
Sent: Sunday, March 12, 2017 8:54 AM
To: Mancini, Mary E
Subject: Re: Pay out of checks from AP per contract

Hi Beth,

I will work on this next week. Will you save me some time and send me a copy of the AP contracts. I met with Anne and Sherry. I will be handling most of the business office operations while Sherry focus on SACS, QEP and something that's due for UG dept. When are you back in the office?

Lalita

Sent from my iPhone

On Mar 11, 2017, at 2:29 PM, Mancini, Mary E <mancini@uta.edu> wrote:

Ladies,

I wanted to put in writing the current situation with the checks from AP and see if we can get a resolution in the queue of items to be handled. Here is the situation:

AP has submitted two checks to the College for my services. Both checks have been deposited (Cyndi provided me copies of the deposit slips.) No payments have been made to me from these checks.

Check #1 -- This check was dated September 22, 2016 and was in the amount of \$20,000. It was deposited on 9/30/16 - Departmental Deposit #0185 to cost center 311609 in account 44451. This check was to provide 5k per month to me for my services May through August 2016.

Check #2 -- This check was dated January 25, 2017 and was in the amount of \$24,000. (The amount was increased to covered the indirect payment to the Dean as outlined in the new contract.) It was deposited on 2/3/17 -- Departmental Deposit #0197 to cost center 311609 in account 44451. This check was to provide 5k per month to me for my services from September through December 2016.

At this point I'm owed 40k for 2016 and I would like to know how this will be paid -- I'd prefer it not be a lump sum but we can certainly do whatever is easiest to do. Also, I'd note, the next check in the amount of 24k from AP will be coming in May. It will be the payment for the period January through April 2017. Hopefully we will have a process in place for handling these routine payments as they go forward.

Please let me know what you need for me to do next. Not urgent but I wouldn't want this to drag on too much longer as the the total amount due accrues every month and the tax hit will be significant.

Beth

From: [Third Bridge Administrator](#)
To: [Mancini, Mary E](#)
Subject: Third Bridge: Payment for your consultation has been approved
Date: Wednesday, January 23, 2019 4:41:26 AM

Dear Mary,

This message serves to notify you that payment for the following consultation:

16/01/2019 - Project QM-1007

has been processed and should reach you within *10 working days* of being released. Payments are released on Friday each week.

To review your account history at any time, please follow this link:

<https://specialist.thirdbridge.com/engagement-history/3290fb6183e5d3c83c78be4160eed4af7b2ad561>

Please do not reply to this email as it was sent from an unmonitored email account and will not be read. If you would like to contact us please email support@thirdbridge.zendesk.com.

Kind regards,

The Third Bridge team

thirdbridge.com



London New York Los Angeles Shanghai Beijing Hong Kong Mumbai

The contents of this email and any attachments are confidential to the sender and the intended recipient and may be privileged. If you receive this in error please contact the sender immediately and delete any material from your computer.

please don't print this e-mail unless you really need to

Privacy Policy

Third Bridge's Privacy Policy which sets out our personal information collection and sharing practices can be found at www.thirdbridge.com/en/privacy-policy



From: [Mancini, Mary E](#)
To: [Divij Vaswani](#)
Subject: Re: Third Bridge: Post-Consultation Feedback
Date: Tuesday, January 15, 2019 9:19:14 PM

Davij,
Glad we were able to connect tonight rather than Friday.
We didn't communicate specifics regards the offer of increased payment for taking the call tonight rather than Friday. Can you give me the specifics?
Thanks

On Jan 15, 2019, at 8:13 PM, Divij Vaswani <divij.vaswani@thirdbridge.com> wrote:

Hi Mary,

Thank you for speaking with our client.

In order to process your payment, please [provide your payment details here](#). Once your details are received, your payment will be processed within 30 days.

For further opportunities, please add to your professional profile [here](#).

If you have any further questions, please contact us [here](#).

Regards,

Divij

[Divij Vaswani](#)
Consulting - North America

D: +1 424 433 4701
thirdbridge.com



London New York Los Angeles Shanghai Beijing Hong Kong Mumbai

Privacy Policy

Third Bridge's Privacy Policy which sets out our personal information collection and sharing practices can be found at www.thirdbridge.com/en/privacy-policy

Compliance Reminder:

The policies below reflect the agreement between you and Third Bridge. Please read them carefully.

I - Before Consultations

- You are free to accept or reject any consultation at any point during the process.
- You have provided accurate and up-to-date biographical and employment information to Third Bridge.
- You confirm that you have obtained all necessary approvals, permissions, consents and waivers that may be required for your participation in the consultations. In particular, you have obtained your employer's consent to participate in the consultations (where applicable).
- If you are an investment, accounting, legal or medical professional you must not give investment, accounting, legal or medical advice, respectively.
- If you are a government official or employee you must not discuss government legislation, regulation, policy, contracts, or other business that you would be in a position to vote upon or otherwise influence.
- If you are a medical professional you must not discuss clinical trial results, patient experience information or other nonpublic information regarding nonpublic trials.
- If you are an auditor or former auditor you must not comment on companies which you have audited in the prior 3 years.

II - During Consultations

- You may decline to respond to any questions asked during the consultation for any reason.
- You must not disclose any confidential information. Please carefully check your confidentiality obligations to any third parties.
- You must not provide any investment, legal, financial, accountancy or medical advice during a consultation.
- You must not disclose any inside information, non-public information concerning a quoted company or instrument, nor any trade secret. If a client solicits any such information, you must end the consultation immediately and notify Third Bridge.
- You must not participate in any consultation that may result in a breach of law, regulation, professional or conduct rules, or that may result in a breach of your obligations to any third parties.
- You must not disclose specific information about your employer or any company by which you are currently engaged (where applicable).
- You must not disclose the identity of other Third Bridge clients you have worked with, or share information about other projects you have been involved in through Third Bridge.
- You must not disclose any information on any clinical trials or tests you have been involved in if the results of such trials or tests have not been publicly disclosed (where applicable).

III - After Consultations

- You must not disclose the identity of the client(s), the subject matter of consultations or any other confidential information.
- You must not solicit Third Bridge's clients other than through Third Bridge for a period of one year from the date of the last consultation with that client unless otherwise agreed in writing with Third Bridge. Exceptions are made if you have a proven pre-existing relationship or association with that client.

If in doubt, you should not take part in the consultation and you should contact us by e-mailing legal@thirdbridge.com.

Third Bridge Inc. is a company incorporated in the State of New York and headquartered at 1411 Broadway, 31st Floor, New York, NY 10018, USA. The contents of this email and any attachments are confidential to the sender and the intended recipient and may be privileged. If you receive this in error please contact the sender immediately and delete any material from your computer.

Please don't print this e-mail unless you really need to



From: [Mancini, Mary E](#)
To: [Divij Vaswani](#)
Subject: Re: Consulting Request
Date: Sunday, January 13, 2019 10:40:08 AM

Divij,
I'm just back in the US --
I can take a call on 6pm (CT) on Tuesday if that would work.

From: Divij Vaswani <divij.vaswani@thirdbridge.com>
Sent: Thursday, January 10, 2019 6:17 PM
To: Mancini, Mary E
Subject: Re: Consulting Request

Our client has selected your profile and would like to speak with you next week. Could you entertain a call earlier than Friday morning if we can increase the compensation?

Thank you.

On Thu, 10 Jan 2019 at 16:14, Divij Vaswani <divij.vaswani@thirdbridge.com> wrote:

Hi Mary,

It looks like you've already accepted our terms. Do you have any questions about them?

They basically state that you won't be asked about your current employer, and it also confirms your compensation of \$200/Hr.

Thanks.

On Thu, 10 Jan 2019 at 16:11, Mancini, Mary E <mancini@uta.edu> wrote:

Friday morning --

But I haven't seen the terms so I'm not committing to doing a call -

From: Divij Vaswani <divij.vaswani@thirdbridge.com>

Sent: Thursday, January 10, 2019 4:31 PM

To: Mancini, Mary E

Subject: Re: Consulting Request

Okay great. Would you be able to take a call next week on Thursday or Friday?

Best,

Divij Vaswani

On Thu, 10 Jan 2019 at 14:23, Mancini, Mary E <mancini@uta.edu> wrote:

Yes --

Academic Partnerships

From: Divij Vaswani <divij.vaswani@thirdbridge.com>

Sent: Thursday, January 10, 2019 11:09 AM

To: Mancini, Mary E

Subject: Re: Consulting Request

Could you provide answers to these two questions?

Q: Have you currently or formerly used an Online Program Manager at your institution (e.g. Bisk, 2U, Academic Partnerships)?

Q: If not, are you negotiating or planning to use an OPM at your institution, and can you speak to your experience?

On Thu, 10 Jan 2019 at 02:49, Mancini, Mary E <mancini@uta.edu> wrote:

Sorry but as noted I'm out of the country with only limited ability to take a call --
Can we try this by email?

From: Divij Vaswani <divij.vaswani@thirdbridge.com>

Sent: Wednesday, January 9, 2019 2:37 PM

To: Mancini, Mary E

Subject: Re: Consulting Request

Do you by chance have any time today? It's a bit time sensitive.

Best,

Divij Vaswani

On Tue, 8 Jan 2019 at 15:58, Divij Vaswani <divij.vaswani@thirdbridge.com> wrote:

Sure let's schedule a call for your return if that works for you.

On Tue, 8 Jan 2019 at 15:53, Mancini, Mary E <mancini@uta.edu> wrote:

Divij,
I'm out of the country so unable to chat for the next week or so --
If this can be delayed, we can set a time to talk.

Regards,
Beth

Mary E. Mancini, RN, PhD, NE-BC, FAHA, ANEF, FAAN
Professor
Sr. Associate Dean for Education Innovation
Baylor Professor for Healthcare Research
The University of Texas at Arlington
College of Nursing and Health Innovation
Past President, The Society for Simulation in Healthcare
817-272-7344 (Office)
mancini@uta.edu

From: Divij Vaswani <divij.vaswani@thirdbridge.com>

Sent: Monday, January 7, 2019 5:55 PM

To: Mancini, Mary E

Subject: Consulting Request

Hi Mary,

We have a project in related to online program management.

Do you have a few minutes to discuss?

--

Divij Vaswani
Analyst

D: +1 424 433 4701
C: +1 714 624 4841

thirdbridge.com
[LinkedIn](#)

[Redacted]

London New York Los Angeles Shanghai Beijing Hong Kong Mumbai

To review Third Bridge's Privacy Policy which sets out our personal information collection and sharing practices, visit www.thirdbridge.com/en/privacy-policy

Third Bridge (US) Inc. is a company headquartered at [1411 Broadway, 31st Floor, New York, NY 10018](#). The contents of this email and any attachments are confidential to the sender and the intended recipient and may be privileged. If you receive this in error please contact the sender immediately and delete any material from your computer.

--

Divij Vaswani
Analyst

D: +1 424 433 4701
C: +1 714 624 4841

thirdbridge.com
[LinkedIn](#)

[Redacted]

London New York Los Angeles Shanghai Beijing Hong Kong Mumbai

To review Third Bridge's Privacy Policy which sets out our personal information collection and sharing practices, visit www.thirdbridge.com/en/privacy-policy

Third Bridge (US) Inc. is a company headquartered at [1411 Broadway, 31st Floor, New York, NY 10018](#). The contents of this email and any attachments are confidential to the sender and the intended recipient and may be privileged. If you receive this in error please contact the sender immediately and delete any material from your computer.

--

Divij Vaswani
Analyst

D: +1 424 433 4701
C: +1 714 624 4841

thirdbridge.com
[LinkedIn](#)

[Redacted]

London New York Los Angeles Shanghai Beijing Hong Kong Mumbai

To review Third Bridge's Privacy Policy which sets out our personal information collection and sharing practices, visit www.thirdbridge.com/en/privacy-policy

Third Bridge (US) Inc. is a company headquartered at [1411 Broadway, 31st Floor, New York, NY 10018](#). The contents of this email and any attachments are confidential to the sender and the intended recipient and may be privileged. If you receive this in error please contact the sender immediately and delete any material from your computer.

--

Divij Vaswani
Analyst

D: +1 424 433 4701
C: +1 714 624 4841

thirdbridge.com
[LinkedIn](#)

[Redacted]

London New York Los Angeles Shanghai Beijing Hong Kong Mumbai