Audit Report: Performance Based Funding Data Integrity

As of September 30, 2015

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REPORT ON THE AUDIT OF

PERFORMANCE BASED FUNDING DATA INTEGRITY

TABLE OF CONTENTS

ITEM........................................PAGE

LETTER OF TRANSMITTAL..................iii
EXECUTIVE SUMMARY.......................iv
SCOPE AND OBJECTIVES.....................1
BACKGROUND................................1
COMMENTS AND RECOMMENDATIONS.........3
CONCLUSION................................5
LIST OF REPORT APPENDICES (A, B and C) 6

<table>
<thead>
<tr>
<th>Performance Funding Model</th>
<th>Excellence</th>
<th>Improvement</th>
<th>Final Score</th>
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<tr>
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<td>75%</td>
<td>6%</td>
</tr>
<tr>
<td>University Average Full-Time Wages of Undergraduates Employed in Florida 1 Year After Graduation</td>
<td>59.590</td>
<td>75%</td>
<td>6%</td>
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<tr>
<td>Average Cost per Undergraduate Degree to the Institution</td>
<td>59.590</td>
<td>75%</td>
<td>6%</td>
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<tr>
<td>In Year Graduation Rate</td>
<td>60%</td>
<td>5%</td>
<td>2%</td>
</tr>
<tr>
<td>Academic Progress Rate</td>
<td>60%</td>
<td>5%</td>
<td>2%</td>
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<tr>
<td>Bachelor’s Degrees Awarded in Areas of Strategic Emphasis (Includes 21% of)</td>
<td>60%</td>
<td>5%</td>
<td>2%</td>
</tr>
<tr>
<td>University Access Rate</td>
<td>60%</td>
<td>5%</td>
<td>2%</td>
</tr>
<tr>
<td>Percent of Undergraduate with a 21% grant</td>
<td>60%</td>
<td>5%</td>
<td>2%</td>
</tr>
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<td>Graduate Degrees Awarded in Areas of Strategic Emphasis (Includes 21% of)</td>
<td>60%</td>
<td>5%</td>
<td>2%</td>
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<td>Institution-Specific Metrics</td>
<td>60%</td>
<td>5%</td>
<td>2%</td>
</tr>
<tr>
<td>Percent of Bachelor’s Degrees without Excess Hours</td>
<td>60%</td>
<td>5%</td>
<td>2%</td>
</tr>
<tr>
<td>Bachelor’s Degrees Awarded to Minority</td>
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<td>5%</td>
<td>2%</td>
</tr>
<tr>
<td>TOTAL</td>
<td>27</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

www.flreq.edu  ROYAL GOVERNORS State University System of Florida
MEMORANDUM

TO: Dr. John Kelly
President

FROM: Morley Barnett
Inspector General

DATE: December 1, 2015

SUBJ: PERFORMANCE BASED FUNDING DATA INTEGRITY AUDIT

In accordance with the University’s Internal Audit Plan for fiscal year 2015-16, and at the request of the Florida Board of Governors, we have conducted an audit of the processes and controls that Florida Atlantic University has in place related to data submissions in support of the BOG performance based funding metrics as of September 30, 2015. The report contained herein presents our scope and objectives and provides comments and conclusions resulting from procedures performed.

We have made one recommendation to address our finding. We concur with the response of the auditee which has been incorporated into the report. In accordance with our established procedures, follow-up will be performed subsequent to the issuance of this report to determine effective implementation of the recommendation by management.

Please call me if you have any questions.

cc: University Provost
Vice Presidents
University Chief Information Officer
University Data Administrator
FAU Board of Trustees
Inspector General, Florida Board of Governors
Florida Auditor General
Executive Summary

In accordance with the University’s Internal Audit Plan for fiscal year 2015-16, and at the request of the Florida Board of Governors (BOG), we have conducted an audit of the University’s processes and controls which support data submitted to the BOG for its performance based funding (PBF) metrics. This audit was part of a system-wide examination based on data submitted as of September 30, 2015.

The primary objectives of this audit were:

- Evaluate controls and processes established by the Office of Institutional Effectiveness and Analysis and primary data custodians to ensure completeness, accuracy and timeliness of data submitted to the BOG; and,

- Provide a reasonable basis of support for the Performance Based Funding Data Integrity Certification statement which is required to be signed by the University president and Board of Trustees chair.

Audit procedures included, but were not limited to, the evaluation of internal controls as those controls relate to the accomplishment of the foregoing audit objectives, as well as compliance testing for a sample of data elements included in files submitted for four of ten BOG performance based funding metrics.

Based on our observations and tests performed, we are of the opinion that the University’s processes and internal controls for data compilation and reporting to the BOG are adequate. We did note delays in submission of data files related to four metrics selected for detailed testing. The details of this finding and suggestion for corrective action, along with other results of tests performed, can be found in the Comments and Recommendations section of this report.
December 1, 2015

Dr. John Kelly  
President  
Florida Atlantic University  
Boca Raton, Florida

Dear President Kelly:

SCOPE AND OBJECTIVE

At the request of the Florida Board of Governors, we have conducted an audit of the processes used by the University to ensure the completeness, accuracy, and timeliness of data submissions to the BOG. As part of this system-wide audit, we chose to focus on four of the ten performance based funding metrics - 4, 5, 6 and 8.

The primary objectives of this audit were to:

- Evaluate controls and processes established by the Office of Institutional Effectiveness and Analysis and primary data custodians to ensure completeness, accuracy and timeliness of data submitted to the BOG; and,

- Provide a reasonable basis of support for the Performance Based Funding Data Integrity Certification statement which is required to be signed by the University president and Board of Trustees chair.

Select samples of data submitted to the BOG as of September 30, 2015 for these four metrics were subject to review of overall controls designed by management to ensure data integrity, as well as verification to original source information. Other relevant information reviewed for the audit included BOG narratives on PBF metric derivations, data definitions, and management documentation related to centralized and decentralized handling of data collection, compilation and submission protocols.

Our audit was conducted in accordance with International Standards for the Professional Practice of Internal Auditing as published by the Institute of Internal Auditors.

BACKGROUND

The Florida Board of Governors has broad governance responsibilities affecting administrative and budgetary matters for Florida’s 12 public universities. Beginning in fiscal year 2013-14, the BOG instituted a performance funding program based on ten metrics, the first eight of which are common to all institutions and the last two reflecting the choices of the BOG and FAU’s
Board of Trustees respectively. Listed below are the 10 performance based funding metrics which are applicable to Florida Atlantic University:

1. Percent of Bachelor's Graduates Employed Full-time in Florida or Continuing their Education in the U.S. One Year After Graduation
2. Median Wages of Bachelor's Graduates Employed Full-time in Florida One Year After Graduation
3. Average Cost per Bachelor’s Degree [Instructional Costs to the University]
4. Six-Year Graduation Rate for First-time-in-College (FTIC)
5. Students Academic Progress Rate [Second Year Retention Rate with GPA Above 2.0]
6. Bachelor’s Degrees Awarded within Programs of Strategic Emphasis [including STEM]
7. University Access Rate [Percent of Undergraduates with a Pell grant]
8. Graduate Degrees Awarded within Programs of Strategic Emphasis [including STEM]
9. Baccalaureate Degrees Awarded Without Excess Hours
10. Percent of Baccalaureate Degrees Awarded to Minorities

The BOG performance funding model has four guiding principles: 1) use metrics that align with SUS Strategic Plan goals, 2) reward Excellence or Improvement, 3) have a few clear, simple metrics, and 4) acknowledge the unique mission of the different institutions.

**Data Input Controls**

The Florida Board of Governors maintains a student unit record database titled the State University Database System (SUDS). This database contains over 400 data elements about students, faculty and programs at SUS institutions. SUDS is part of a web-based portal developed by the BOG for the SUS to report data and has centralized security protocols for access, data encryption and password controls. Initial input of data files supporting PBF metrics is the responsibility of primary data custodians, such as the Admissions Office, Office of the Registrar, and Student Financial Aid and is scheduled to be uploaded to SUDS based on the BOG’s Due Date Master Calendar. Data uploaded to SUDS by various departments are subject to edit checks to help ensure propriety, consistency with BOG-defined data elements, and accuracy of information submitted. Once satisfied that any edits errors have been fully addressed, official submission of data files to the BOG is controlled by the Office of Institutional Effectiveness and Analysis (IEA), a unit within the Office of Information Technology.

Each file submission by IEA is subject to an affirmation statement in SUDS which declares that data submitted for approval “represents electronic certification of this data per Board of Governors Regulation 3.007”. The University also requires an internal certification by departments when they upload data to SUDS. The internal certification is an email notification to IEA from the departmental data custodian manager which states “I certify that the approved business process for submission of the data file(s) has been followed and that the data submission is free from any major errors and accurate to the best of my knowledge”. Board of Governors acceptance of data submissions is a formal process which is documented in SUDS, and if a submission is rejected, it will be subject to resubmission protocols set by the BOG.

**Retention and Graduation Rates - Metrics 4 & 5**

The national standard graduation rate was created by the Student Right to Know Act of 1990, which required institutions of higher education receiving federal financial assistance to report graduation rates to current and prospective students via the US Department of Education's Integrated Postsecondary Education Data System (IPEDS). This act established the graduation
rate based on 150% of the normal time for completion from the program - which is six years for a four-year program. In 2011, the Board of Governors included retention and graduation rate metrics in its 2012-2025 System Strategic Plan. In 2014, the importance of the retention and graduation rate data was further elevated by their inclusion in a new Performance-Based Funding Model.

**Percentage of Degrees Awarded in Programs of Strategic Emphasis – Metrics 6 & 8**

The Board of Governors for the State University System of Florida maintains a list of Programs of Strategic Emphasis that promotes the alignment of the State University System degree program offerings with the economic development and workforce needs of the State. This list of Programs of Strategic Emphasis is not a static list – it has been updated several times to reflect that Florida’s workforce needs change over time and to account for programs that are added or deleted from year to year. In 2005, the Board updated the list as part of the 2005-2013 System Strategic Plan, and the list was again formally updated in 2009 as part of the 2012-2025 Strategic Plan effort. The categories associated with the Programs of Strategic Emphasis were updated again by the Board during the November 2013 meeting.

**COMMENTS AND RECOMMENDATIONS**

The following are the results of testing specific data elements included in tables of data files submitted to the BOG in support of performance based funding. Samples were judgmentally selected based on our understanding of management and system controls in place during the audit period, as well as file submission protocols established by the BOG.

| Metric # 4 – Six-Year FTIC Graduation Rate |
| Metric # 5 – Academic Progress Rate       |
| (2nd Year Retention with GPA Above 2.0)   |
| Data Files:                              |
| Student Instruction - SIF; Degrees Awarded - SIFD; Retention - RET |
| Tables:                                  |
| Enrollment, Degrees Awarded and Retention Cohort (various elements reviewed) |

25 students, 14 elements tested to original sources or calculated if required – **NO EXCEPTIONS**

| Metric # 6 – Bachelor's Degrees Awarded within Programs of Strategic Emphasis (includes STEM) |
| Metric # 8 – Graduate Degrees Awarded within Programs of Strategic Emphasis (includes STEM) |
| Data Files:                               |
| Degrees Awarded - SIFD                   |
| Tables:                                  |
| Degrees Awarded (various elements reviewed) |

30 students, 8 elements tested to original sources or calculated if required – **NO EXCEPTIONS**
Current Findings and Recommendations

Timeliness of Data File Submissions

Based on our review of University data files submitted to the BOG in support of the four metrics covered in this audit, we noted the following delays in file submissions to the BOG.

<table>
<thead>
<tr>
<th>Data Submission</th>
<th>Reporting Period</th>
<th>Due Date</th>
<th>Date File Submitted</th>
<th># of Business Days Late</th>
</tr>
</thead>
<tbody>
<tr>
<td>Degrees Awarded (SIFD)</td>
<td>Spring 2015</td>
<td>7/1/15</td>
<td>7/20/15</td>
<td>13</td>
</tr>
<tr>
<td>Retention File (RET)</td>
<td>Annual 2013/14</td>
<td>1/21/15</td>
<td>1/28/15</td>
<td>5</td>
</tr>
</tbody>
</table>

IEA management has indicated that instances of filing tardiness were mainly due to the untimely identification and correction of data errors, and late processing of programming changes mandated by the BOG.

Recommendation No. 1

While we recognize that the BOG on occasion has delays in making the most up-to-date versions of its software available for submission of data, we recommend that IEA, the Office of Information Technology, and primary data custodians work more closely to promptly identify and resolve any issues under management’s control that could potentially result in filing delays.

Management’s Response

Action Plan:

It is agreed that the timeliness of our submissions needs to be improved. After the data administrator workshop in June of each year, IEA will meet by August with the programmers, registrar and admissions as needed to review the programming code that needs to be altered or added so that the specialists in each area can review the code with the programmers to have it ready well before the submission date. In addition IEA will send out a weekly reminder that shows all the submissions, their due dates, and requires those responsible to note their progress on the data file submission.

Implementation Date:

August 2016 - Data integrity review of code; October 2015 - Weekly update

Responsible Auditee:

Jeff E. Hoyt, University Data Administrator
Prior Audit Recommendations

Our examination generally includes a follow-up on findings and recommendations of prior internal audits, where the subjects of such findings are applicable to the scope of the current audit being performed.

No recommendations were made in our initial (9/30/14) audit of performance-based funding data integrity. Accordingly, a follow-up on prior audit findings is not applicable.

CONCLUSION

Based on our audit, we have concluded that the controls and processes which Florida Atlantic University has in place to ensure the accuracy and completeness of data submitted to the Board of Governors in support of performance based funding are adequate. As noted in the Comments and Recommendations section of this report, we re-emphasize the timely submission of data files to the BOG as part of the University’s overall data integrity and accountability goals.

We believe our audit can be relied upon by the University Board of Trustees and president as a basis for certifying the representations made to the Board of Governors related to integrity of data required for its performance based funding model.

*******************

We wish to thank the staffs of the Office of Institutional Effectiveness and Analysis, Office of the Registrar, and other primary data custodians for their cooperation and assistance which contributed to the successful completion of this audit.

Morley Barnett, CPA, CPE
Inspector General

Audit performed by: Mike Hewett, CIA, CGAP, CBA, CFSA
Morley Barnett, CPA, CFE
***LIST OF REPORT APPENDICES***

Appendix

- TYPICAL INTERNAL DATA PROCESS FLOW AND SUBMISSION TO BOG  A

- BOG NARRATIVES FOR DERIVATION OF FUNDING METRICS 4, 5, 6 and 8  B

- DATA INTEGRITY CERTIFICATION STATEMENT REQUIRED BY BOG  C
Appendix A

Typical Process Flow for Data Integrity and Submission to the Florida Board of Governors

Office of Undergraduate Admissions

[Flowchart diagram showing the process flow for data integrity and submission to the Florida Board of Governors.]

1 of 2
Appendix A

Typical Process Flow for Data Integrity and Submission to the Florida Board of Governors

Office of the Registrar
BOG NARRATIVES FOR DERIVATION OF PERFORMANCE FUNDING METRICS

Methodology & Procedures Derivation for Metrics 4, 5, 6 and 8

The following methodology and procedures documents were prepared by the Florida Board of Governors to explain derivation of accountability metrics used in its performance based funding program for the State University System of Florida.

- Graduation and Retention Rates (#4 & #5)
- Degrees in Programs of Strategic Emphasis (#6 & #8)

BOG References to Other Metrics Methodology Documents:

http://www.flbog.edu/about/budget/performance_funding.php
Performance Funding Metrics
Retention and Graduation Rates

OVERVIEW OF METHODOLOGY AND PROCEDURES
The national standard graduation rate was created by the Student Right to Know Act of 1990, which required institutions of higher education receiving federal financial assistance to report graduation rates to current and prospective students via the US Department of Education's Integrated Postsecondary Education Data System (IPEDS). This act established the graduation rate based on 150% of the normal time for completion from the program - which is six years for a four-year program.

In 2011, the Board of Governors included retention and graduation rate metrics in its 2012-2025 System Strategic Plan. In 2014, the importance of the retention and graduation rate data was further elevated by their inclusion in a new Performance-Based Funding Model. This document provides details on the methodology and procedures used by Board of Governors staff during the analysis of the retention and graduation rate data as reported in the 2012-13 Accountability Reports and used in the 2014 Performance Based Funding model.
1. **Data Sources**

The State University System of Florida Board of Governors maintains a student unit record database titled the State University Database System (SUDS). This database contains over 400 data elements about students, faculty and programs at SUS institutions. Retention and graduation rate data are finalized using the Retention file. The Board of Governors' Information Resource Management (IRM) unit builds the Retention file annually using the Student Instruction File (SIF) and the Degrees Awarded (SIFD) files. Once Retention has been built, each university reviews the Retention file and works with IRM staff to make edits before university Data Administrators approve and submit the data to IRM.

2. **Defining the Cohort**

A cohort is a group of people used in a study who have something in common. In this case, a cohort is composed of students who were all admitted to the university during the same year. There are six components that determine student cohorts:

   a. **Student Level:**
      
      Only the students who meet the following criteria are included in the cohort.
      
      - **STUDENT CLASS LEVEL [#1060]** is either L (lower division undergraduate) or U (upper division undergraduate).
      - **DEGREE HIGHEST HELD [#1112]** must be less than a Bachelor’s.
      - **FEE CLASSIFICATION KIND [#1107]** must equal 'G' (general instruction).

   b. **Cohort Year:**
      
      A year is measured differently in retention and graduation data than the standard academic year (of summer, fall, spring). A retention cohort year is defined as the fall, spring, and summer terms. Students selected for inclusion within each Cohort Year are based on the following rule:
      
      - **DATE MOST RECENT ADMISSION [#1420]** equals **REPORTING TIME FRAME [#2001]**.

   c. **Cohort Types:**
      
      The **COHORT TYPE [#1429]** is a derived element that is built by IRM and is based on the **TYPE OF STUDENT AT TIME OF MOST RECENT ADMISSION [#1413]** as assigned by the university.
      
      - First-Time in College Students include two types of students:
        
        - Students who are admitted into a university for the first time and who have earned less than 12 credit hours after high school graduation [#1413= ‘B’].
        
        - Students who are considered ‘Early Admits’ because they have been admitted to the university prior to their high school graduation [#1413= ‘E’].
      
      - AA Transfer Students who have transferred from the Florida College System with an Associate in Arts Degree. This value is based on the three following elements:
        
        - **TYPE OF STUDENT AT DATE OF ENTRY [#1068]** or **TYPE OF STUDENT AT TIME OF MOST RECENT ADMISSION [#1413]** equals ‘J’.
        
        - **DEGREE HIGHEST HELD [#1112]** equals ‘A’ (Associates).
        
        - **LAST INSTITUTIONAL CODE [#1067]** or **INSTITUTION GRANTING HIGHEST DEGREE [#1411]** must equal a Florida Public Community College.
      
      - Other Transfer Students include all other undergraduate transfer students.

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d. Student Right to Know Flag:
The STUDENT RIGHT TO KNOW (SRK) FLAG [#1437] is an entry status indicator that is a 'Yes/No' flag based on the term (Summer, Fall, or Spring) that a student is first admitted.

- YES: If a student enters the institution in the fall term the SRK flag will be set to 'Yes'. If a student enters the institution in the summer term and progresses to fall term, the SRK flag will be set to 'Yes'.
- NO: If a student enters in the summer term and does not progress to the fall term; or, if a student enters in the spring term the SRK flag will be set to 'No'.

e. Full-Time / Part-Time Indicator:
The FULL-TIME / PART-TIME INDICATOR [#1433] is an indicator based on the number of credit hours attempted (not earned) during the first semester.

- This indicator is based on the CURRENT TERM COURSE LOAD [#1063] which is the number of hours enrolled/attempted during a term. This excludes courses that are audited, all credits awarded during the term through 'Credit by Examination'. Students completing prior term incompletes are not included unless they have registered and paid fees for the credits they are completing.
- This indicator is used in reporting retention and graduation data to the federal government - to IPEDS.

f. Cohort Revisions and Adjustments:
The US Congress and the US Dept. of Education allow institutions to make revisions and adjustments to their student cohorts. These cohort adjustments are typically the cause of the differences between the preliminary and final retention and graduation rates as reported in the annual accountability reports.

Cohort Revisions
Cohorts can be revised to reflect better information that has become available since the cohort was first reported. Examples of common revisions include: demographic changes, student type changes, etc...

Cohort Adjustments
Students may be removed from a cohort if they left the institution for one of the following reasons: death or total and permanent disability; service in the armed forces (including those called to active duty); service with a foreign aid service of the federal government, such as the Peace Corps; or service on official church missions.

- Cohort Adjustment Flag [#1442] is a data element on the Retention Cohort Changes (RETC) table that is used to indicate that a retention file record has been modified based on a change in status of the student at the institution.
  - University Data Administrators identify the students who have died, suffered a permanent disability, left to serve in the Armed Services, left to serve in with Foreign Aid Service of the federal government (such as the Peace Corps), or left to serve on an Official Church Mission. These students are removed from the cohort and are not included in the retention and graduation rates.
3. **Data Analysis**

After universities have approved the Retention file, IRM staff update the retention database with the most recent data and provide a subset of the data to the Board’s Institutional Research (IR) staff for analysis. The analysis that the IR staff conducts is a very straightforward process that simply counts the number of students in a cohort (which serves as the denominator) and then counts the number of those same students who are retained or graduated by a specified year (which serves as the numerator).

**a. Second Year Retention Rates**

- **Cohorts:** The number of students in the cohort serves as the denominator for the retention rate, and is based on the following rules: Cohort Type= ‘FTIC’; SRK= ‘Yes’; FT/PT Indicator= ‘Full-time’.
- **Retained:** The number of students in the cohort who are enrolled during the second fall term serves as the numerator for the retention rate.
- **Grade Point Average:** A GPA criterion can be added to the standard retention rate metric to gain a sense of how well students who are retained are actually doing in their courses. Board staff decided to use a cumulative GPA (at the end of the first year - before the second fall term) of at least 2.0 as a threshold because it is a commonly referenced measure of satisfactory academic progress. In fact, FTICs who return for their 2nd fall with a GPA above 2.0 are **8 times more likely** to graduate within six years than students who begin their second Fall with a GPA of less than 2.0.
  - The University GPA [1801] element is included on the Enrollments table and provides a student’s GPA for a given term as well as the cumulative GPA (at the beginning or end of the term). Board staff use the cumulative GPA that is derived using the following formula:

\[
\frac{(GPA_{INST\_GRADE\_PTS}\ [+\ GPA_{TERM\_GRADE\_PTS}])}{(GPA_{INST\_HRS} + GPA_{TERM\_CREDIT\_HRS})}
\]

  - Note: In Summer 2014, an error was detected in the code that has historically calculated the cumulative GPA. The previous incorrect formula used the earned credit hours [1089] in the denominator - instead of the attempted credit hours [1088]. This inflated GPAs by excluding any credit hours with a non-passing (‘D’, ‘F’) or withdrawn grades.

### COMPARISON OF HISTORIC AND REVISED GPA METHODOLOGIES

For 2012-13 Full-time, FTIC 2nd Year Retention Rate with GPA >=2.0

<table>
<thead>
<tr>
<th>UNIV.</th>
<th>HISTORIC</th>
<th>REVISED</th>
<th>DIFF.</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>COHORT</td>
<td>RETAINED</td>
<td>%</td>
</tr>
<tr>
<td>FAMU</td>
<td>1,499</td>
<td>1,074</td>
<td>72%</td>
</tr>
<tr>
<td>FAU</td>
<td>3,037</td>
<td>2,118</td>
<td>70%</td>
</tr>
<tr>
<td>FGCU</td>
<td>2,686</td>
<td>1,932</td>
<td>72%</td>
</tr>
<tr>
<td>FIU</td>
<td>4,142</td>
<td>3,216</td>
<td>78%</td>
</tr>
<tr>
<td>FSU</td>
<td>5,749</td>
<td>5,192</td>
<td>90%</td>
</tr>
<tr>
<td>NCF</td>
<td>223</td>
<td>181</td>
<td>81%</td>
</tr>
<tr>
<td>UCF</td>
<td>5,933</td>
<td>5,095</td>
<td>86%</td>
</tr>
<tr>
<td>UF</td>
<td>6,264</td>
<td>6,009</td>
<td>96%</td>
</tr>
<tr>
<td>UNF</td>
<td>1,581</td>
<td>1,207</td>
<td>76%</td>
</tr>
<tr>
<td>USF</td>
<td>4,508</td>
<td>3,864</td>
<td>86%</td>
</tr>
<tr>
<td>UWF</td>
<td>1,620</td>
<td>1,014</td>
<td>63%</td>
</tr>
<tr>
<td>SUS</td>
<td>37,243</td>
<td>31,445</td>
<td>84%</td>
</tr>
</tbody>
</table>

**SOURCE:** Board of Governors, extracted from SUSRI Retention Summary on 9/25/2014.
Retention & Graduation Rates

Six Year Graduation Rates

- Cohorts: The number of students in the cohort serves as the denominator for the graduation rate, and is based on the following rules:
  1. Board of Governors: Cohort Type = 'FTIC'; SRK = 'Yes'; FT/PT Indicator = 'Full-time' or 'Part-time'.
  2. IPEDS: Cohort Type = 'FTIC'; SRK = 'Yes'; FT/PT Indicator = 'Full-time' only.

- Graduated: The number of students in the cohort who graduated within six years from the same university serves as the numerator for the graduation rate.

4. Using Outcomes

a. Timing Issues

   The SUDS data submission cycle for retention and graduation rate data plays a role in how the data are reported and used for policymaking.

   - Enrollment data is reported on a term basis and has two submissions each term:
     1. Preliminary Fall enrollment data provides a snapshot at the beginning of the term and is submitted annually in mid-October on the Preliminary Student Instruction File (SIFP).
     2. Final Fall enrollment data provides comprehensive data after the end of the term and is submitted annually in mid-January in the Student Instruction File (SIF).

   - Degree data is reported only once after each term in the Student Instruction File for Degrees (SIFD). However, this data often includes 'late degrees' which are degrees that were awarded in a previous term, but are only just now being reported to SUDS. Because graduation rates are based on a Fall, Spring, Summer year, the final graduation rates cannot be determined until the 'late' Summer degrees are reported in the following Summer SIFD submission. Summer degree data is submitted annually in early-October.

   - Therefore, the retention and graduation rates that are reported in the end-of-year accountability reports are based on preliminary data - retention is based on preliminary enrollment records, and graduation rates do not include 'late degrees'. The difference between preliminary and final retention and graduation rates is historically very small - usually less than 1% point for any university.

b. Annual Accountability Reports

   Board staff provided the results of the retention and graduation rate data analysis to each university data administrator for their review prior to the data being approved by each university Board of Trustee and the Board of Governors as part of the 2012-13 Accountability Report process. As the previous section explained, the timing of the accountability report requires that retention and graduation rates for the most recent year rely on preliminary data.
c. **Performance-Based Funding Model**
   For the purposes of the Performance-Based Funding model, all data is final by March 1. This date was selected because it enables funding allocations to be made using final retention and graduation rate data instead of the preliminary data that is reported in the accountability reports.

<table>
<thead>
<tr>
<th></th>
<th>FAMU</th>
<th>FAU</th>
<th>FGCU</th>
<th>FIU</th>
<th>FSU</th>
<th>NCF</th>
<th>UCF</th>
<th>UF</th>
<th>UNF</th>
<th>USF</th>
<th>UWF</th>
<th>SUS</th>
</tr>
</thead>
<tbody>
<tr>
<td>2007-13</td>
<td>41%</td>
<td>40%</td>
<td>43%</td>
<td>50%</td>
<td>77%</td>
<td>66%</td>
<td>66%</td>
<td>86%</td>
<td>49%</td>
<td>62%</td>
<td>42%</td>
<td>68%</td>
</tr>
<tr>
<td>%pt Change</td>
<td>2%</td>
<td>0%</td>
<td>-1%</td>
<td>3%</td>
<td>2%</td>
<td>-3%</td>
<td>1%</td>
<td>1%</td>
<td>2%</td>
<td>7%</td>
<td>-2%</td>
<td>1%</td>
</tr>
</tbody>
</table>

**Six-Year Graduation Rate for First-time-in-College (FTIC) Students** [includes full- and part-time students]


d. **Federal Reporting**

   The standard retention rates reported to IPEDS are based on the same methodology that is used for annual accountability reporting to the Board of Governors. It should be noted that IPEDS does not add any GPA criterion when asking for second year retention data. However, there are methodological differences in the graduation rates that are reported to IPEDS and the graduation rates that are used for annual accountability reporting to the Board of Governors.

   Historically, the Graduation Rates (GR) survey for IPEDS only collects data on the cohort of full-time, first-time degree/certificate-seeking undergraduate students. The annual accountability reports include this ‘federal’ methodology (see Table 4C), and the accountability report also include students who did not take a full-load their first semester and are classified as part-time (see Table 4D).

   It is also important to note that the Board of Governors Database Administrator is responsible for reporting graduation rate data to IPEDS.

e. **Data Resubmissions**

   The Office of the Board of Governors believes that the accuracy of the data it collects and reports is paramount to ensuring accountability in the State University System. Thus, the Board Office requires university resubmissions of data to correct errors when they are discovered. This policy can lead to changes in historical data.
Performance Funding Metrics
Percentage of Degrees Awarded in Programs of Strategic Emphasis
(for Bachelor’s and Graduate Degrees)

OVERVIEW
OF METHODOLOGY
AND PROCEDURES
The Board of Governors for the State University System of Florida maintains a list of Programs of Strategic Emphasis that promotes the alignment of the State University System degree program offerings with the economic development and workforce needs of the State. This list of Programs of Strategic Emphasis is not a static list – it has been updated several times to reflect that Florida’s workforce needs change over time and to account for programs that are added or deleted from year to year. The original list was created as part of a 2001 Advisory Group on Emerging Technologies. In 2005, the Board updated the list as part of the 2005-2013 System Strategic Plan, and the list was again formally updated in 2009 as part of the 2012-2025 Strategic Plan effort.

This document provides details on the methodology and procedures used by Board of Governors staff to calculate the Percentage of Degrees Awarded in Programs of Strategic Emphasis (for both bachelor’s and graduate level) as reported in the 2012-13 Accountability Report and used in the 2014 Performance Based Funding model.

It is important to note that the categories associated with the Programs of Strategic Emphasis were updated again by the Board during the November 2013 meeting. The revised list will be used in all future calculations of these data.
1. **Board Staff Analysis of State University Database System (SUDS) Data**

The State University System of Florida Board of Governors maintains a student unit record database titled the State University Database System (SUDS). This database contains over 400 data elements about students, faculty and programs at SUS institutions. The Percentage of Degrees Awarded in Programs of Strategic Emphasis is based on data that universities submit to the Board office as part of the Degrees Awarded table on the Degrees Awarded (SIFD) file submission\(^1\). Degree data is collected three times a year at the end of each term. The data used to determine the Percentage of Degrees Awarded in Programs of Strategic Emphasis is summarized in the table below, and details of the analysis Board staff conducted is described in later sections.

### SUDS Elements Used in the Percentage of Degrees Awarded in Programs of Strategic Emphasis

<table>
<thead>
<tr>
<th>Submission</th>
<th>Table</th>
<th>Element Name</th>
<th>Element Number</th>
</tr>
</thead>
<tbody>
<tr>
<td>SIFD</td>
<td>Degrees Awarded</td>
<td>Degree Program Category</td>
<td>1082</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Degree Program Fraction of Degree Granted</td>
<td>1083</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Reporting Institution</td>
<td>1045</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Term Degree Granted</td>
<td>1412</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Degree Level Granted</td>
<td>1081</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Major Indicator</td>
<td>2015</td>
</tr>
</tbody>
</table>

### Number of Degrees

The number of degrees awarded in Programs of Strategic Emphasis is a count of graduates with certain skill sets (not an unduplicated count of degrees), so we include all of the disciplines/CIP codes that a student completes – this includes first majors, second majors, and dual degrees.

- There are several scenarios when a student can earn a degree from more than one CIP code. By far the most common examples are at the bachelor’s level within Business programs – when a student graduates with an even amount of work from two different CIPs (i.e., finance, business, marketing, accounting and political science to name a few). Other examples, which are much less common, occur when a student earns two separate degrees from two separate disciplines (“dual degrees”), or when a student earns only one degree but has done more work in one CIP than the other (“dual majors”).
- The number of degrees used in the calculation of the Percentage of Degrees Awarded in Programs of Strategic Emphasis – for both the numerator (representing the select disciplines identified by the Board) and the denominator (representing all disciplines) – is made by rounding the Degree Program Fraction of Degree Granted \([\#1083]\) for each Degree Program Category \([\#1082]\) for each student up to ‘1’ and then summing.

A student who is awarded one bachelor’s degree but did an equal amount of work in two separate disciplines (Fraction of a Degree = 0.5 for both CIPs) will be counted twice in the denominator and potentially twice in the numerator.

---

\(^1\) The SUDS Data Dictionary has detailed definitions for the 21 elements included within the Degrees Awarded table and is available at: [https://prod.flbog.net:4445/pls/apex/f?p=112:50:5018573689494::NO::P50_ROW_DISPLAY_COLUMNS:50](https://prod.flbog.net:4445/pls/apex/f?p=112:50:5018573689494::NO::P50_ROW_DISPLAY_COLUMNS:50).
PERFORMANCE FUNDING METRICS  
PERCENTAGE OF DEGREES AWARDED IN PROGRAMS OF STRATEGIC EMPHASIS

b. Reporting Period
The reporting year for degrees includes the Summer, Fall, and Spring terms of a given year. The SIFD submission often includes students who were awarded a degree in a previous term that was not previously reported. The total number of degrees used to calculate the degrees awarded in Programs of Strategic Emphasis can include the degrees that were reported out-of-term (also referred to as ‘late’ degrees). Because it is not unusual for the Summer SIFD to include degrees for students who actually graduated in the previous reporting year, the final degree data can include data reported on the following Summer SIFD.

2. Board Staff Analysis of Academic Program Inventory
The Board's Information Resource Management (IRM) staff queried the SUDS database and provided the Board's Institutional Research (IR) unit with student-level data. The IR unit then compares the Degree Program Category [#1082] for each degree with the Academic Program Inventory2 to determine the number of degrees awarded within the Programs of Strategic Emphasis.

a. Programs of Strategic Emphasis (PSE)
The list of Programs of Strategic Emphasis (PSE) promotes the alignment of the State University System degree program offerings with the economic development and workforce needs of the State. The list is not a static list – it has been updated several times to reflect that Florida’s workforce needs change over time, and to account for programs that are added or deleted from year to year. The 2012-13 degree data was queried in November for the annual Accountability reports and again in March for the University Work Plans.

The 2012-13 degree data for Programs of Strategic Emphasis consisted of five categories: Science, Technology, Engineering, and Mathematics (STEM), Critical Needs: Education, Global, Security, and Critical Needs: Health. It is important to note that the education and health categories only represented select disciplines and did not reflect all degrees awarded within the general field of education or health. For example, education disciplines were based on Florida State Board of Education list of critical teacher shortage areas which is published annually. The table below provides the number of CIP codes included for each category (as of Nov. 8, 2013), when the degree data was queried.

<table>
<thead>
<tr>
<th>PROGRAMS OF STRATEGIC EMPHASIS CATEGORIES</th>
<th>NUMBER OF DISCIPLINES</th>
</tr>
</thead>
<tbody>
<tr>
<td>STEM</td>
<td>115</td>
</tr>
<tr>
<td>GLOBAL</td>
<td>28</td>
</tr>
<tr>
<td>HEALTH</td>
<td>21</td>
</tr>
<tr>
<td>EDUCATION</td>
<td>19</td>
</tr>
<tr>
<td>SECURITY</td>
<td>9</td>
</tr>
</tbody>
</table>

It is important to note that the categories associated with the Programs of Strategic Emphasis were updated again by the Board during the November 2013 meeting. The revised list will be used in all future calculations of these data.

---

2 In accordance with the requirements of Board of Governors regulation 8.011(4)(d), the Board office maintains the official State University System Academic Degree Program Inventory (available at: [https://prod.flbog.net:4445/degreeinventory](https://prod.flbog.net:4445/degreeinventory)) that identifies all the approved degree programs for each university within the System. The programs are listed based on the Classification of Instructional Programs (CIP) taxonomy that the US Dept. of Education maintains. Universities may have multiple “majors” at the same degree level under one CIP code in accordance with definitions specified in regulation 8.011 and they may have degree programs at different levels within the same CIP. One aspect of the Inventory is a continually updated list of the Programs of Strategic Emphasis. Information on the list of PSE is also available at: [http://www.flbog.edu/pressroom/strategic_emphasis/](http://www.flbog.edu/pressroom/strategic_emphasis/).
3. **Using Outcomes**

**Performance Based Funding Model**

Board staff provided the results of the data analysis to each university data administrator for their review prior to the data being included and approved by each university Board of Trustees and the Board of Governors as part of the 2012-13 Accountability Report and 2014-15 University Work Plan. The Percentage of Degrees Awarded in Programs of Strategic Emphasis data used for the 2014 Performance Based Funding Model are shown below.

### Percentage of Degrees Awarded in Programs of Strategic Emphasis (PSE)

<table>
<thead>
<tr>
<th>BACHELOR’S</th>
<th>FAMU</th>
<th>FAU</th>
<th>FGCU</th>
<th>FIU</th>
<th>FSU</th>
<th>NCF*</th>
<th>UCF</th>
<th>UF</th>
<th>UNF</th>
<th>USF</th>
<th>UWF</th>
<th>SUS</th>
</tr>
</thead>
<tbody>
<tr>
<td>STEM</td>
<td>262</td>
<td>1,100</td>
<td>334</td>
<td>1,315</td>
<td>1,452</td>
<td>59</td>
<td>1,879</td>
<td>2,690</td>
<td>360</td>
<td>2,071</td>
<td>363</td>
<td>11,885</td>
</tr>
<tr>
<td>HEALTH</td>
<td>105</td>
<td>260</td>
<td>87</td>
<td>241</td>
<td>216</td>
<td>0</td>
<td>959</td>
<td>249</td>
<td>195</td>
<td>803</td>
<td>135</td>
<td>3,250</td>
</tr>
<tr>
<td>SECURITY</td>
<td>179</td>
<td>376</td>
<td>144</td>
<td>504</td>
<td>472</td>
<td>0</td>
<td>544</td>
<td>248</td>
<td>192</td>
<td>540</td>
<td>88</td>
<td>3,287</td>
</tr>
<tr>
<td>GLOBAL</td>
<td>87</td>
<td>362</td>
<td>54</td>
<td>1,252</td>
<td>961</td>
<td>52</td>
<td>546</td>
<td>809</td>
<td>257</td>
<td>566</td>
<td>95</td>
<td>5,041</td>
</tr>
<tr>
<td>EDUCATION</td>
<td>2</td>
<td>48</td>
<td>56</td>
<td>36</td>
<td>98</td>
<td>0</td>
<td>145</td>
<td>23</td>
<td>86</td>
<td>215</td>
<td>90</td>
<td>799</td>
</tr>
<tr>
<td><strong>SUBTOTAL</strong></td>
<td>635</td>
<td>2,146</td>
<td>675</td>
<td>3,348</td>
<td>3,199</td>
<td>111</td>
<td>4,073</td>
<td>4,019</td>
<td>1,090</td>
<td>4,195</td>
<td>771</td>
<td>24,262</td>
</tr>
<tr>
<td>NOT PSE</td>
<td>854</td>
<td>3,229</td>
<td>1,244</td>
<td>5,112</td>
<td>5,881</td>
<td>87</td>
<td>7,517</td>
<td>4,482</td>
<td>2,259</td>
<td>5,002</td>
<td>1,226</td>
<td>36,893</td>
</tr>
<tr>
<td><strong>TOTAL</strong></td>
<td><strong>1,489</strong></td>
<td><strong>5,375</strong></td>
<td><strong>1,919</strong></td>
<td><strong>8,460</strong></td>
<td><strong>9,080</strong></td>
<td><strong>198</strong></td>
<td><strong>11,590</strong></td>
<td><strong>8,501</strong></td>
<td><strong>3,349</strong></td>
<td><strong>9,197</strong></td>
<td><strong>1,997</strong></td>
<td><strong>61,155</strong></td>
</tr>
<tr>
<td><strong>SUBTOTAL / TOTAL</strong></td>
<td><strong>43%</strong></td>
<td><strong>40%</strong></td>
<td><strong>35%</strong></td>
<td><strong>40%</strong></td>
<td><strong>35%</strong></td>
<td><strong>56%</strong></td>
<td><strong>35%</strong></td>
<td><strong>47%</strong></td>
<td><strong>33%</strong></td>
<td><strong>46%</strong></td>
<td><strong>39%</strong></td>
<td><strong>40%</strong></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>GRADUATE</th>
<th>FAMU</th>
<th>FAU</th>
<th>FGCU</th>
<th>FIU</th>
<th>FSU</th>
<th>NCF*</th>
<th>UCF</th>
<th>UF</th>
<th>UNF</th>
<th>USF</th>
<th>UWF</th>
<th>SUS</th>
</tr>
</thead>
<tbody>
<tr>
<td>STEM</td>
<td>61</td>
<td>251</td>
<td>9</td>
<td>547</td>
<td>467</td>
<td>.</td>
<td>715</td>
<td>2,153</td>
<td>46</td>
<td>845</td>
<td>93</td>
<td>5,187</td>
</tr>
<tr>
<td>HEALTH</td>
<td>198</td>
<td>178</td>
<td>81</td>
<td>494</td>
<td>221</td>
<td>.</td>
<td>234</td>
<td>1,157</td>
<td>81</td>
<td>697</td>
<td>23</td>
<td>3,364</td>
</tr>
<tr>
<td>SECURITY</td>
<td>0</td>
<td>11</td>
<td>28</td>
<td>85</td>
<td>78</td>
<td>.</td>
<td>86</td>
<td>7</td>
<td>11</td>
<td>44</td>
<td>12</td>
<td>362</td>
</tr>
<tr>
<td>GLOBAL</td>
<td>0</td>
<td>30</td>
<td>0</td>
<td>210</td>
<td>141</td>
<td>.</td>
<td>28</td>
<td>132</td>
<td>0</td>
<td>79</td>
<td>19</td>
<td>639</td>
</tr>
<tr>
<td>EDUCATION</td>
<td>1</td>
<td>36</td>
<td>19</td>
<td>49</td>
<td>57</td>
<td>.</td>
<td>145</td>
<td>75</td>
<td>58</td>
<td>151</td>
<td>36</td>
<td>627</td>
</tr>
<tr>
<td><strong>SUBTOTAL</strong></td>
<td><strong>260</strong></td>
<td><strong>506</strong></td>
<td><strong>137</strong></td>
<td><strong>1,385</strong></td>
<td><strong>964</strong></td>
<td><strong>1,208</strong></td>
<td><strong>3,524</strong></td>
<td><strong>196</strong></td>
<td><strong>1,816</strong></td>
<td><strong>183</strong></td>
<td><strong>10,179</strong></td>
<td></td>
</tr>
<tr>
<td>NOT PSE</td>
<td>415</td>
<td>1,039</td>
<td>248</td>
<td>2,048</td>
<td>2,140</td>
<td>.</td>
<td>1,353</td>
<td>2,436</td>
<td>386</td>
<td>1,375</td>
<td>442</td>
<td>11,882</td>
</tr>
<tr>
<td><strong>TOTAL</strong></td>
<td><strong>675</strong></td>
<td><strong>1,545</strong></td>
<td><strong>385</strong></td>
<td><strong>3,433</strong></td>
<td><strong>3,104</strong></td>
<td><strong>.</strong></td>
<td><strong>2,561</strong></td>
<td><strong>5,960</strong></td>
<td><strong>582</strong></td>
<td><strong>3,191</strong></td>
<td><strong>625</strong></td>
<td><strong>22,061</strong></td>
</tr>
<tr>
<td><strong>SUBTOTAL / TOTAL</strong></td>
<td><strong>39%</strong></td>
<td><strong>33%</strong></td>
<td><strong>36%</strong></td>
<td><strong>40%</strong></td>
<td><strong>31%</strong></td>
<td><strong>.</strong></td>
<td><strong>47%</strong></td>
<td><strong>59%</strong></td>
<td><strong>34%</strong></td>
<td><strong>57%</strong></td>
<td><strong>29%</strong></td>
<td><strong>46%</strong></td>
</tr>
</tbody>
</table>

**Source:** Board of Governors staff analysis of SUDS Data. Note*: NCF has not historically reported bachelor's degrees by CIP code in SUDS. These values were provided by NCF not by Board staff.
Appendix C

Performance Based Funding
Data Integrity Certification

Name of University: ________________________________

Period Ending: ________________________________

INSTRUCTIONS: Please respond “Yes,” “No” or “N/A” in the blocks below for each representation. Explain any “No” or “N/A” responses to ensure clarity of the representation and include copies of supporting documentation as attachment(s).

<table>
<thead>
<tr>
<th>Performance Based Funding Data Integrity Certification Representations</th>
<th>Yes</th>
<th>No</th>
<th>N/A</th>
<th>Comment / Reference</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. I am responsible for establishing and maintaining, and have established and maintained, effective internal controls and monitoring over my university’s collection and reporting of data submitted to the Board of Governors Office which will be used by the Board of Governors in Performance Based Funding decision-making.</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td></td>
</tr>
<tr>
<td>2. These internal controls and monitoring activities include, but are not limited to, reliable processes, controls, and procedures designed to ensure that data required in reports filed with my Board of Trustees and the Board of Governors are recorded, processed, summarized and reported in a manner which ensures its accuracy and completeness.</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td></td>
</tr>
<tr>
<td>3. In accordance with Board of Governors Regulation 1.001(3), my Board of Trustees has required that I maintain an effective information system to provide accurate, timely, and cost-effective information about the university, and shall require that all data and reporting requirements of the Board of Governors are met.</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td></td>
</tr>
<tr>
<td>4. In accordance with Board of Governors Regulation 3.007, my university shall provide accurate data to the Board of Governors.</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td></td>
</tr>
<tr>
<td>Performance Based Funding Data Integrity Certification Representations</td>
<td>Yes</td>
<td>No</td>
<td>N/A</td>
<td>Comment / Reference</td>
</tr>
<tr>
<td>---------------------------------------------------------------</td>
<td>-----</td>
<td>----</td>
<td>-----</td>
<td>---------------------</td>
</tr>
<tr>
<td>Office.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>5. In accordance with Board of Governors Regulation 3.007, I have appointed a Data Administrator to certify and manage the submission of data to the Board of Governors Office.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>6. In accordance with Board of Governors Regulation 3.007, I have tasked my Data Administrator to ensure the data file (prior to submission) is consistent with the criteria established by the Board of Governors Data Committee. The due diligence includes performing tests on the file using applications/processes provided by the Board of Governors Information Resource Management (IRM) office.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>7. When critical errors have been identified, through the processes identified in item #6, a written explanation of the critical errors was included with the file submission.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>8. In accordance with Board of Governors Regulation 3.007, my Data Administrator has submitted data files to the Board of Governors Office in accordance with the specified schedule.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>9. In accordance with Board of Governors Regulation 3.007, my Data Administrator electronically certifies data submissions in the State University Data System by acknowledging the following statement, “Ready to submit: Pressing <strong>Submit for Approval</strong> represents electronic certification of this data per Board of Governors Regulation 3.007.”</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>10. I am responsible for taking timely and appropriate preventive / corrective actions for deficiencies noted through reviews, audits, and investigations.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>11. I recognize that the Board’s Performance Based Funding initiative will drive university policy on a wide range of university operations – from admissions through graduation. I certify that university policy changes and decisions impacting this initiative have been made to</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
### Performance Based Funding Data Integrity Certification Representations

<table>
<thead>
<tr>
<th>Representations</th>
<th>Yes</th>
<th>No</th>
<th>N/A</th>
<th>Comment / Reference</th>
</tr>
</thead>
<tbody>
<tr>
<td>bring the university’s operations and practices in line with State University System Strategic Plan goals and have not been made for the purposes of artificially inflating performance metrics.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

I certify that all information provided as part of the Board of Governors Performance Based Funding Data Integrity Certification is true and correct to the best of my knowledge; and I understand that any unsubstantiated, false, misleading or withheld information relating to these statements render this certification void. My signature below acknowledges that I have read and understand these statements. I certify that this information will be reported to the board of trustees and the Board of Governors.

Certification: ___________________________________________ Date______________________

President

I certify that this Board of Governors Performance Based Funding Data Integrity Certification has been approved by the university board of trustees and is true and correct to the best of my knowledge.

Certification: ___________________________________________ Date______________________

Board of Trustees Chair