Final
Internal Audit Report 2018.02
FY18 Performance Based Funding Data Integrity

Issued to:
UNF Board of Trustees
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UNF UNIVERSITY *of* NORTH FLORIDA.

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The Swoop

Executive Summary

The University of North Florida (UNF), established in 1972, has gained national recognition for its quality, service and signature emphasis on *Transformational Learning Opportunities* for students. The student population has grown to over 16,000, and the University now has six colleges: Education and Human Services; Business; Health; Arts & Sciences; Honors; and Computing, Engineering, and Construction. The University is overseen by an appointed Board of Trustees which reports to the Florida Board of Governors.

Among its many responsibilities, the State University System (SUS) of Florida's Board of Governors (BOG) monitors activity and awards funding using the results of 10 performance based funding (PBF) metrics. The PBF metrics' calculations are derived by the BOG, partially from data submitted by the universities and partially from other sources. The BOG requests each university perform an audit of the processes to ensure the completeness, accuracy, and timeliness of data submissions.

In keeping with this request, this audit gathered information and tested controls to support the University's signing of the Data Integrity Certification Form which is to be signed by the Chair of the UNF Board of Trustees and the University President. We found the University has key internal controls in place to adequately protect the data integrity of files submitted to the BOG and can provide assurances to the UNF Chair of the Board of Trustees and University President to sign the Data Integrity Certification Representation Form.

We categorized the overall residual risk ranking to be ***low***. The collective issues identified are considered minor opportunities for improvement (as defined in Appendix I). The Office of Internal Auditing would like to note that the staff who took part in the audit were knowledgeable of their area, responded quickly to questions, and showed patience throughout the review. Their cooperation was greatly appreciated.

Summary of Recommendations

The Office of Internal Auditing's (OIA) mission is to provide independent, objective assurances and consulting activities which add value and help to improve operations. This audit included tests to validate key internal controls that support data integrity and gathered information regarding the University's data governance policies, information systems, data administrator's responsibilities, submission and resubmission procedures, and business continuity for data planning.

In these areas, we identified four (4) *Osprey Opportunities* to further enhance the data control environment to address minor risks. OIA defines a *minor* risk rating as a nominal violation to policies and/or procedures that may warrant additional controls to decrease risks. These *Osprey Opportunities* will add best practices to further strengthen the existing controls. The rating scale is described in more detail in <u>Appendix I</u>. These items are discussed in detail in the **Observations and Recommendations** section of the report.

We recommend:
1. The University formalize the data governance structure.
2. IR develop written office procedures.
3. IR document user access reviews to shared network folders.
4. IR review auditable activities for shared network folders and determine those which may arise to a materiality to track with logs.

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Background, Objectives, and Scope

The Performance Based Funding Data Integrity audit was requested by the BOG and is part of the fiscal year 2017-2018 risk-based audit plan approved by the University President and the UNF Board of Trustees. The purpose of the audit was to assess the effectiveness of processes designed to ensure the completeness, accuracy, and timeliness of data submissions to the BOG. For each metric, institutions are evaluated on either Excellence (a raw score) or Improvement (the percentage change from the prior year). Performance is based on data from one academic year. The BOG uses data to perform calculations from the files provided by the Office of Institutional Research (IR). The University is not involved in the calculations made by the BOG. Therefore, those additional calculations are not included in the scope of this audit. Appendix II states each metric and the data files used by the BOG for calculations. Appendix III defines the ten metrics and their corresponding data elements.

The scope of this audit included interviews with Institutional Research, Academic Affairs, Information Technology Services, and Enrollment Services. The audit period emphasis was for fiscal year 2017. In addition, detailed information from a select sample of file submissions were reviewed to gain assurances on data submission procedures. The principal audit objectives were to:

- ✓ Determine whether the University has adequate controls in place to ensure the completeness, accuracy and timeliness of data submissions to the BOG, which support the calculation of Performance Based Funding Metrics.
- ✓ Provide an objective basis of support for the President and Chair of the Board of Trustees to sign the required representations in the Performance Based Funding - Data Integrity Certification which will be filed with the BOG on or before March 1, 2018.
- ✓ Follow-up on implementation of corrective action plans reported in the prior audit.

The Office of Institutional Research has the responsibility for meeting data file submission deadlines to the BOG. IR is staffed with seven employees. The office has a director, an assistant director, a senior analyst, two analysts, a programmer analyst, and an office manager. The director was appointed as the data administrator contact by the University President. The director and other IR staff take active roles participating on many campus-wide committees to ensure data captured by departments is accurately defined within Banner, UNF's financial and student records system. These committees include the Student Records Committee, Advising Steering Committee, and the Compliance and Risks Discussion Forum.

Since hiring a new director last year, IR has focused on process efficiencies and data accuracies. Internal Audit's emphasis was to test data files used in the metrics' calculations. This year we focused detail testing with two data files (HTD, RET) and traced to UNF's system of record, Banner. There was a change of methodology in the hours-to-degree file, and we noted no issues in the changes. The change included prioritizing the student's native earned hours over transfer hours to meet the total hours needed for the program requirements.

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Within the scope of this audit, we also reviewed the University's process for data governance and the responsibilities that functional users, also referred to as data stewards, share with IR to ensure the completeness, accuracy, and timeliness of data entered into Banner. Noted in <u>Appendix II</u>, we described the 10 PBF metrics, the corresponding file that contains the data used for the metric calculation, and the functional data user. IR has also implemented functional level reviews by these data stewards before all file submissions.

The audit fieldwork was from September 19, 2017 to January 19, 2018. We conducted the audit in accordance with the International Standards for the Professional Practices of Internal Auditing as promulgated by The Institute of Internal Auditors. We relied on UNF Policies and Regulations, State of Florida Board of Governors Regulations and best business practices to support strong internal controls to guide recommendations. We also relied on COBIT 4.1 framework (Control Objectives for Information and Related Technology) and NIST 800-53 security controls and assessment procedures (National Institute of Standards and Technology) for IT governance and standards. The following section of this report, titled **Observations and Recommendations,** discusses in greater detail the recommendations resulting from this audit engagement.

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Observations and Recommendations

Osprey Opportunity #1: Data Governance Standards
Minor Risk

Observation:
This observation is a follow-up item from prior year's audit. The University has identified persons to oversee access and integrity of data in critical areas, such as financial aid, student records, personnel, and financial transactions. These persons are referred to as the data stewards or data owners. Roles and responsibilities, standards, and processes for the data stewards have not been formally identified in a university-wide data governance plan. The IR Director, with active participation from the Office of the CIO, has developed data governance plans. In the last year, IR and the CIO have partnered to implement a data dictionary which defines data and information workflow. The manufacturer for the data dictionary platform, iData, plans to provide a consulting report on specific data governance frameworks.

Criteria:
Sound business practices suggest a data governance structure be established with data stewards and responsibilities identified. EDUCAUSE, a nonprofit association for the purpose of advancing IT in Higher Education, states that "data stewards' responsibilities can be grouped into four main areas: operational oversight; data quality; privacy, security, and risk management; and policies and procedures".

Cause:
The University's planning for a formalized data governance structure is a three year plan which includes implementing a data dictionary within the first year.

Risk/Effect:
Failure to formalize an organization's data governance structure which includes defining the roles and responsibilities of data stewards may increase risks of poor data quality and security. Formalizing a framework for data stewards will improve controls for integrity and security of data submitted to the BOG and used in the PBF metrics.

Recommendation:
We recommend IR continue to partner with others on campus to formalize a data governance structure with written roles and responsibilities for the various levels within the framework.

Management Response:
We concur. Implementing a formalized Data Governance structure will be a multi-year undertaking. Institutional Research and Information Technology Services have already started the process with a ground up approach by implementing a university data dictionary, utilizing Data Cookbook, by iData, to provide us with an assessment of our current data practices as well as recommendations for Data Governance implementation. The iData report is forthcoming.

As part of the data dictionary implementation, data stewards have been identified, a workflow for definition approvals has been built, and university standards have been determined for data definitions. We are also working with the data stewards to identify individual goals for hydrating the data dictionary such as devoting specific time per week or defining the definitions used in their top ten reports.

We have identified the next step in formalizing our Data Governance structure as the formal development of a Data Governance Committee to be composed of university Data Stewards, relevant Information Technology personnel, and led by Institutional Research. The first meeting of this group is scheduled for March 1st. Beyond that we are proposing the development of a higher level Data Governance Council to be composed of Data Trustees that will be responsible for planning and policy making decisions around data.

Osprey Opportunity #2: Departmental Procedures
Minor Risk

Observation:
This observation is a follow-up item from the prior year's audit. IR had limited written departmental procedures. The department maintains SQL code for file submissions, however, written operational steps were not available. Written procedures are important due to the complexities of data submissions, small staff size, and tight deadlines the office maintains for file submissions to the BOG. As written procedures are prioritized, we encourage the office to include a disaster recovery and business continuity plan for critical files and procedures.

Criteria:
Sound business practices suggest the establishment of written procedures to ensure consistent communication and practices so decisions taken will be in accordance with University policies, state, and other applicable guidelines.

Cause:
The director stated that detailed written procedures were delayed due to staff limitations but a process has already begun to document departmental steps.

Risk/Effect:
Failure to ensure written procedures could lead to miscommunication and uncertainty for departmental expectations. Further, without written procedures, the University may be susceptible to increased risks of untimely decisions and follow-up.

Recommendation:
We recommend IR begin developing a written operational handbook for prioritized procedures.

Management Response:
We agree. Currently, Institutional Research will continue to document the processes for running the code within the SQL as instructional text preceding the actual code per sections.

Additionally, any changes made to the code whether those changes are directed by the Board of Governors or those changes are necessary due to changes in local data processes will also be documented in the SQL as text with documentation. Over the last year, we have focused on accuracy in reporting our state submissions and made adjustments as needed to ensure that what we are reporting most accurately aligns with UNF's processes and procedures. We have relied heavily on Board of Governors staff for guidance, as there is little formal documentation published for these submissions.

As we move forward toward our long term goal of reporting the state submissions out of UNF's enterprise data warehouse (EDW), we are building formal specifications to include departmental procedures, local and BOG definitions, and the technical details (i.e. where is this information in Banner, EDW, etc.) within the Data Cookbook.

Osprey Opportunity #3: User Access Reviews
Minor Risk

Observation:
Internal Audit noted documented user access reviews did not occur for IR's shared network folder with ITS and other users. During fieldwork, the IR director reviewed users and made edits so those only with responsibilities within the files were granted an appropriate level of access.

Criteria:
COBIT 4.1 framework provides a business framework to support governance and the management of enterprise information technology. Specifically, COBIT Deliver and Support (DS) 5.4 *User Account Management* recommends performing regular reviews of all accounts. Similarly, the Account Management Access control activities in the NIST Special Publication 800-53 Titled *Account Management* states, in part, the organization reviews the privileges assigned and reassigns or removes privileges, if necessary, to correctly reflect the organizational mission/business needs.

Cause:
The IR director stated access reviews to shared network folders were overlooked and a review was conducted immediately.

Risk/Effect:
Failure to complete consistent, documented user access reviews increases risks of unauthorized access which does not support assigning privileges on the least restrictive need.

Recommendation:
We recommend that IR develop written procedures to complete consistent, documented access reviews.

Management Response:

We concur, and we have taken the appropriate steps to fix the issues we found after the Office of Internal Auditing shared the list of users who had access to Q:\BOR. We worked closely with the IT Security team and now assign access to Q:\BOR based on the Institutional Research Active Directory Group. By changing to this process, when individuals leave the institution, their access will automatically be removed. If an individual changes departments, their access will change dependent on their new role and they will no longer have access to Institutional Research folders. Additionally, the Director of Institutional Research will conduct quarterly reviews of the access list. Beginning in April 2018, the access list will be requested from IT Security on the first of the month in January, April, July, and October.

Osprey Opportunity #4: Audit Logs
Minor Risk

Observation:

We noted that audit logs to track the individuals accessing shared network folders were not enabled. We found multiple individuals outside of IR may have a business need to access IR's shared network folders. IR's shared network folders contain sensitive and critical data for the BOG file submissions. It may prove beneficial to enable an audit trail for certain activities.

Criteria:

NIST SP 800-53 standards state in the *Audit and Accountability* control activities that the organization should identify user activities that need to be tracked, provide rationale for why the auditable events are deemed to be adequate to support after-the-fact investigations of security incidents; and protect against individuals having performed an action.

Cause:

The information security director stated it is not a standard practice to enable audit logs without protocol for review due to the vast amount of information it can produce. The IR director stated it was not previously considered.

Risk/Effect:

Failure to consider auditable events which could be logged, increases risks of unknown persons accessing critical data.

Recommendation:

We recommend IR review auditable events for their shared network folders and determine those which may arise to a materiality to track with audit logs.

Management Response:

Institutional Research is working with the IT Security team and the CIO to have audit logs turned on for the state submission folders within Q:\BOR that are related to the PBF metrics: ADF, SDF, SFA, HTD, and Retention. The audit logs will be retained for 12 months.

Appendix I

Report and Item Ranking Scale

Overall Report Residual Risk Ranking

- **Low**
  - o The internal control system scoped within the audit is functioning satisfactorily and remaining operating risks are low.
  - o The collective audit issues are considered minor deficiencies.
  - o Related corrective action need only be addressed to improve current operations.

- **Moderate**
  - o The internal control system scoped within the audit is functioning in a manner that provides reasonable assurance that most major risks will be mitigated.
  - o Corrective action to address the audit issues may not be critical to the university's business operations as a whole but should be addressed to minimize financial, reputational, operational and strategic risks.

- **High**
  - o The internal control system scoped within the audit needs major improvement.
  - o The deficiencies identified could significantly impair operations.
  - o If corrective action is not implemented timely, issues may escalate to cause critical financial, reputational, operational or strategic risks.
  - o Corrective action plans should be given a priority.

Reportable Item Ranking Scale

- **Minor Risk [*Osprey Opportunity*]**
  - o Observation reportable to address a nominal risk.
  - o Recommendations provide opportunities for improvement.
  - o Minor violations of procedures, rules, or regulations.
  - o Routine administration attention requested.
  - o Corrective action strongly recommended to improve quality or processes of area being audited.

- **Notable Risk**
  - o Significant observation reportable to address an increased risk.
  - o Multiple violations of policies and procedures, and/or weak internal controls.
  - o Important opportunity to improve effectiveness and efficiency.
  - o Corrective action required.

- **Critical Risk**
  - o Major observation reportable due to a critical risk to the university.
  - o Material violation of policies/procedures/laws, and/or unacceptable internal controls, and/or high risk for fraud/waste/abuse, and/or major opportunity to improve effectiveness and efficiency.
  - o Material risk identified.
  - o Immediate corrective action required.

Appendix II

Metric Sources

Metric	Description	Submitted Data File Name	Data Used/Created by BOG	Functional Data User
1	Percent of Bachelor's Graduates Employed Full-Time in Florida or Continuing Education in U.S. one year after Graduation	SIFP, SIF, SIFD	Accountability Report (table 4O), National Student Clearinghouse (NSC), Florida Education and Training Placement Information Program (FETPIP) analysis of Wage Record Interchange System (WRIS2), and Federal Employment Data Exchange (FEDES)	Registrar
2	Median Wages of Bachelor's Graduates Employed Full-Time in Florida one year after Graduation	SIFP, SIF, SIFD	Accountability Report (table 4O), FETPIP, WRIS2, FEDES, and NSC	Registrar
3	Cost to the Student: Net Tuition & Fees per 120 Credit Hours	HTD, SFA, SIF	Accountability Report (Table 1D)	Registrar
4	Six Year Graduation Rate FTIC (first time in college) Students	SIF, SIFP, SIFD, RET	Accountability Report (Table 4D)	Registrar
5	Academic Progress Rate	SIF, RET	Accountability Report (Table 4B)	Registrar
6	Bachelor's Degrees Awarded in Areas of Strategic Emphasis (includes STEM)	SIFD	Accountability Report (Table 4H)	Registrar
7	University Access Rate	SFA, SIF	Accountability Report (Table 3E)	Financial Aid, Registrar
8	Graduate Degrees Awarded in Areas of Strategic Emphasis (includes Stem)	SIFD	Accountability Report (Table 5C)	Registrar
9	BOG Choice: Percent of Bachelor's Degrees Without Excess Hours	HTD	Accountability Report (Table 4J)	Registrar
10	BOT Choice: Undergraduate FTE Enrollments in Online Courses	SIF	Accountability Report (Table 3C)	Registrar

SIFP = Student Instruction File – Preliminary
SIF = Student Instruction File
SIFD = Student Instruction File – Degrees Awarded
HTD = Hours to Degree

RET = Retention File
SFA = Student Financial Aid

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Appendix III

Metric Definitions,

Source: BOG, March 14, 2017

1. Percent of Bachelor's Graduates Enrolled or Employed ($25,000+) in the U.S. One Year After Graduation	This metric is based on the percentage of a graduating class of bachelor's degree recipients who are enrolled or employed (earning at least $25,000) somewhere in the United States. Students who do not have valid social security numbers and are not found enrolled are excluded. This data now includes non-Florida data from 41 states and districts, including the District of Columbia and Puerto Rico. Sources: Accountability Report (Table 4O). State University Database System (SUDS), Florida Education & Training Placement Information Program (FETPIP) analysis of Wage Record Interchange System (WRIS2) and Federal Employment Data Exchange (FEDES), and National Student Clearinghouse (NSC).
2. Median Wages of Bachelor's Graduates Employed Full-time One Year After Graduation	This metric is based on annualized Unemployment Insurance (UI) wage data from the fourth fiscal quarter after graduation for bachelor's recipients. This data does not include individuals who are self-employed, employed by the military, those without a valid social security number, or making less than minimum wage. This data now includes non-Florida data from 41 states and districts, including the District of Columbia and Puerto Rico. Sources: Accountability Report (Table 4O). State University Database System (SUDS), Florida Education & Training Placement Information Program (FETPIP) analysis of Wage Record Interchange System (WRIS2) and Federal Employment Data Exchange (FEDES), and National Student Clearinghouse (NSC).
Data Elements for Metrics #1 & #2	1. Term degree granted 6. Person name-first 2. Degree level granted 7. Date of birth 3. Major indicator 8. Person name – middle initial 4. Degree program fraction of degree granted 9. Person name- middle 5. Person name-last
3. Cost to the Student *Net Tuition & Fees per 120 credit hours*	This metric is based on resident undergraduate student tuition and fees, books and supplies as calculated by the College Board (which serves as a proxy until a university work group makes an alternative recommendation), the average number of credit hours attempted by students who were admitted as FTIC and graduated with a bachelor's degree for programs that requires 120 credit hours, and financial aid (grants, scholarships and waivers) provided to students. Source: Accountability Report (Table 1D) – which, combines the Legislature's annual General Appropriations Act, university required fees and several files (HTD, SFA, SIF) within SUDS.
Data Elements for Metrics #3	1. Fee classification-residency 6. Fee waiver kind/3rd party kind 2. Student class level 7. Award payment term 3. Financial aid award program identifier 8. Term amount 4. Student section credit 5. Student section funding flag 9. Demo time frame

4. Six Year FTIC Graduation Rate	This metric is based on the percentage of first-time-in-college (FTIC) students who started in the Fall (or summer continuing to Fall) term and had graduated from the same institution within six years. Source: Accountability Report (Table 4D).
5. Academic Progress Rate *2nd Year Retention with GPA Above 2.0*	This metric is based on the percentage of first-time-in-college (FTIC) students who started in the Fall (or summer continuing to Fall) term and were enrolled full-time in their first semester and were still enrolled in the same institution during the Fall term following their first year with had a grade point average (GPA) of at least 2.0 at the end of their first year (Fall, Spring, Summer). Source: Accountability Report (Table 4B).

Data Elements for Metrics #4 &#5	1. Student class level 2. Degree highest held 3. Fee Classification kind 4. Date most recent admission 5. Reporting time frame 6. Cohort type 7. Type of student at time of most recent admission 8. Type of student at date of entry 9. Degree highest held 10. Last institutional code	11. Institution granting highest degree 12. Student right to know flag 13. Full-time / part-time indicator 14. Current term course load 15. Cohort adjustment flag 16. Degree level sought 17. GPA institutional grade points 18. GPA term grade points 19. GPA institutional hours 20. GPA term credit hours

6. Bachelor's Degrees within Programs of Strategic Emphasis	This metric is based on the number of baccalaureate degrees awarded within the programs designated by the Board of Governors as 'Programs of Strategic Emphasis'. A student who has multiple majors in the subset of targeted Classification of Instruction Program codes will be counted twice (e.g., double-majors are included). Source: Accountability Report (Table 4H).

Data Elements for Metrics #6 & #8	1. Degree program category 2. Degree program fraction of degree granted 3. Reporting institution	4. Term degree granted 5. Degree level granted 6. Major indicator

7. University Access Rate *Percent of Undergraduates with a Pell-grant*	This metric is based the number of undergraduates, enrolled during the fall term, who received a Pell-grant during the fall term. Unclassified students, who are not eligible for Pell-grants, were excluded from this metric. Source: Accountability Report (Table 3E).

Data Elements for Metrics #7	1. Financial aid award program identifier 2. Award payment term 3. Non-resident alien flag	4. Student class level 5. Type of student at time of most recent admission

8a. Graduate Degrees within Programs of Strategic Emphasis	This metric is based on the number of graduate degrees awarded within the programs designated by the Board of Governors as 'Programs of Strategic Emphasis'. A student who has multiple majors in the subset of targeted Classification of Instruction Program codes will be counted twice (e.g., double-majors are included). Source: Accountability Report (Table 5C).

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BOG Choice Metrics

9a. Percent of Bachelor's Degrees Without Excess Hours FAMU, FAU, FGCU, FIU, UCF, **UNF**, USF, UWF	This metric is based on the percentage of baccalaureate degrees awarded within 110% of the credit hours required for a degree based on the Board of Governors Academic Program Inventory. Additional Note: It is important to note that the statutory provisions of the "Excess Hour Surcharge" (1009.286, FS) have been modified several times by the Florida Legislature, resulting in a phased-in approach that has created three different cohorts of students with different requirements. The performance funding metric data is based on the latest statutory requirements that mandates 110% of required hours as the threshold. In accordance with statute, this metric excludes the following types of student credits (eg, accelerated mechanisms, remedial coursework, non-native credit hours that are not used toward the degree, non-native credit hours from failed, incomplete, withdrawn, or repeated courses, credit hours from internship programs, credit hours up to 10 foreign language credit hours, and credit hours earned in military science courses that are part of the Reserve Officers' Training Corps (ROTC) program). Source: Accountability Report (Table 4J), State University Database System (SUDS).
Data Elements for Metrics #9 (and used with #3)	1. Course system code 8. Type of student at time of most recent admission 2. Course grouping code 9. Degree highest held 3. Credit hour usage indicator 10. Last institutional code 4. Section credit 11. Institution granting highest degree 5. Credit hour testing method 12. Catalog term 6. Course section type 13. Program length is based on academic program inventory 7. Excess hours exclusion

BOT Choice Metrics

10g. Percent of Undergraduate FTE in Online Courses UNF	This metric is based on the percentage of undergraduate full-time equivalent (FTE) students enrolled in online courses. The FTE student is a measure of instructional activity that is based on the number of credit hours that students enroll by course level. Distance Learning is a course in which at least 80 percent of the direct instruction of the course is delivered using some form of technology when the student and instructor are separated by time or space, or both (per 1009.24(17), F.S.). Source: Accountability Report (Table 3C), State University Database System (SUDS).

Performance Based Funding
March 2018 Data Integrity Certification

STATE UNIVERSITY SYSTEM of FLORIDA
Board of Governors

Name of University: **University of North Florida**

INSTRUCTIONS: Please respond "Yes" or "No" for each representation below.   Explain any "No" responses to ensure clarity of the representation you are making to the Board of Governors. Modify representations to reflect any noted audit findings.

Performance Based Funding Data Integrity Certification Representations			
Representations	Yes	No	Comment / Reference
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.	☒	☐	
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.	☒	☐	
3. In accordance with Board of Governors Regulation 1.001(3)(f), 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.	☒	☐	
4. In accordance with Board of Governors Regulation 3.007, my university shall provide accurate data to the Board of Governors Office.	☒	☐	
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.	☒	☐	

Performance Based Funding
Data Integrity Certification

Performance Based Funding Data Integrity Certification Representations			
Representations	Yes	No	Comment / Reference
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 Office.	☒	☐	
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.	☒	☐	
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.	☒	☐	
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 **Submit for Approval** represents electronic certification of this data per Board of Governors Regulation 3.007."	☒	☐	
10. I am responsible for taking timely and appropriate preventive / corrective actions for deficiencies noted through reviews, audits, and investigations.	☒	☐	
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 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.	☒	☐	

Performance Based Funding
Data Integrity Certification

Performance Based Funding Data Integrity Certification Representations			
Representations	Yes	No	Comment / Reference
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 2-9-18 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 2-9-18 Board of Trustees Chair			