



Florida A&M University Project Report

2017-18 Performance Based Funding Data Integrity Audit

Overall Rating	Finding Counts	Target Completion
SOME IMPROVEMENT NEEDED	4 Findings and 0 Management Comments	February 2, 2018

Objective, Background and Scope

Purpose / Objective	Background	Scope
<p>The Performance Based Funding Data Integrity Audit is designed to assess those controls that address the topic of data integrity, including a detailed analysis of the processes, procedures, system based controls and other data verification measures in place to support the integrity of information presented to the Florida Board of Governors for the University's Performance Funding calculations. The objectives of this audit were to:</p> <ul style="list-style-type: none"> A. Determine whether the university's performance based funding-related controls, processes, and data submissions are complete, accurate, and data submissions are timely. B. Evaluate the representations included on the Data Integrity Certification. C. Evaluate consistency of data submissions with the data definitions and guidance provided by the Board of Governors through the Data Committee and communications from data workshops. 	<p>The Division of Audit and Compliance conducts internal audits of the University's Operations, programs, and activities to provide management with independent, objective assurance services designed to add value and improve the University's operations to help the University accomplish its objectives by bringing a systematic, disciplined approach to evaluate and improve the effectiveness of risk management, control, and governance processes.</p> <p>Audit Methodology</p> <p>Data submitted to the BOG, upon which performance funding is based, and methods and controls applied by management to ensure data integrity were subject to several key audit procedures. Specifically, detailed management narratives, as well as BOG publications related to data compilation were reviewed, and various samples of data reported to the BOG were verified to University source documents.</p>	<p>The focus of the audit is specifically on the controls surrounding the development and submission of data upon which the University's 10 Performance Funding Metrics as outlined and approved by Florida Board of Governors:</p> <ol style="list-style-type: none"> 1. Percent of Bachelor's Graduates Enrolled or Employed (\$25,000+) 2. Median Wages of Bachelor's Graduates Employed Full-time One Year After Graduation 3. Cost to the Student (Net Tuition and Fee Cost to the Student) 4. Six Year FTIC Graduation Rate 5. Academic Progress Rate (2nd Year Retention with GPA Above 2.0) 6. Bachelor's Degrees within Programs of Strategic Emphasis 7. University Access Rate (Percent of Undergraduates with a Pell-grant) 8. Graduate Degrees Awarded in Areas of Strategic Emphasis (includes STEM) 9. Percent of Bachelor's Degrees without Excess Hours 10. Percent of R&D Expenditures Funded from External Sources <p>Management responses to audit inquiries gathered are intended to reflect managements' assertions as to the validity, consistency, and integrity of Performance Funding Data. This audit reviewed Performance Funding Metrics reported data as of October 31, 2017.</p>

Overall Project Rating

Overall Conclusion / Rating Description	Rating Scale
Based on our audit we have concluded that some improvement is needed for controls and processes which Florida A & M University has in place to ensure the accuracy and completeness of data submitted to the Board of Governors in support of performance based funding. Generally, controls evaluated were adequate, appropriate, and effective to provide reasonable assurance that risks related to Performance Based Funding are being managed and objectives of data submissions as outlined in Florida Board of Governor file submission guides were met.	EFFECTIVE SOME IMPROVEMENT NEEDED MAJOR IMPROVEMENT NEEDED UNSATISFACTORY

Management Response & Action Plan

Management Response & Action Plan
Management plans to implement and over see corrective action plans are outlined in each finding.

Finding Summary

4 Findings and 0 Management Comments

Finding ID	Title	Rating	Disposition of	Executive Owner
-1	User Access Privileges & Reviews (Repeat Finding)	HIGH	Reportable Condition	Wanda Ford
-2	Separation of Duties (Repeat Finding)	HIGH	Reportable Condition	Rodner Wright
-3	Degree Audit (Repeat Finding)	MEDIUM	Reportable Condition	Rodner Wright
-4	Updates to the Academic Advisement module	MEDIUM	Reportable Condition	Rodner Wright

User Access Privileges & Reviews (Repeat Finding)

Executive Owner: Wanda Ford

Details		Finding Owner: Ronald Henry	Remediation Deadline: June 30, 2018
Details		Risk/Impact	Recommendation
<p>Information Technology Services (ITS) has been working to correct the prior audit findings from the 2014-2015, 2015-2016, and 2016-17 Performance Funding Data Integrity Audits related to inappropriate or unnecessary information technology (IT) access privileges within PeopleSoft and a lack of user access reviews by departments who perform critical data functions as it relates to performance funding. Upon review of the security access matrices and user access review process by the Chief Information Officer and Chief Information Security Officer, it was decided to bring in a consultant to overhaul and rebuild the entire access control process. Therefore, the Division of Audit and Compliance (DAC) did not retest for inappropriate access privileges during the audit period. Instead, DAC performed extensive testing on each data file to ensure that any inappropriate access that may exist did not impact the accuracy of the files submitted to the Florida Board of Governors. DAC did not detect any file issues caused by inappropriate access to system data.</p> <p>In response to DAC's request from management regarding progress made on the user access project, the office of Information Technology Services (ITS) stated in a memo on February 9, 2018, that the access review project is currently 40% complete. ITS created security matrices and pulled a row level security matrix for each Campus Solutions business area (Student Financials, Student Records, Financial Aid, and Admissions). Each business area was provided training on how to read, review, and make necessary changes to access in their area. ITS is currently working with each business area to fully complete the reviews and make all necessary access changes.</p>		<p>Implementing user access rights in line with business requirements lowers security risk by:</p> <ol style="list-style-type: none"> 1. Prevention of unauthorized access to systems/data 2. Assurance that every entity has only the necessary level of access 3. Safeguarding of sensitive information 4. Verification of the identity of users accessing systems <p>Providing information security entity classification services, enables appropriate grouping and categorization of information security entities to classify the appropriate level of risk.</p>	<p>The Division of Audit and Compliance recommends that ITS continue to work toward the completion of the security matrices project. Additionally, DAC recommends that ITS document any changes to their access control and user review procedures as a result of the project.</p>
Status: OPEN	Finding ID: -1	Risk Level: HIGH	Disposition of: Reportable Condition
Remediation Status: Not Corrected (In Process)			

Management Response & Action Plan:

ITS is in the process of working with each Campus Solution business area to complete their security review. The following reviews and related access changes are expected to be completed by June 30, 2018:

- Student Financials (3 areas with 17 employees): Currently all 3 areas have been reviewed, with only one employee's access still under review.
- Office of the Registrar (4 areas with 21 employees): Currently 1 of 4 areas have been reviewed. The review process for this area is complex due to employees performing various tasks that cause additional roles/permission lists to be generated for that employee. Additionally, due to other audit findings in this area, additional security matrices were provided for review.
- Office of Financial Aid (5 areas with 20 - 22 employees): Review is in progress.
- Undergraduates Admissions (2 areas with 14 employees): Review is in progress.

ITS security is striving to make the necessary changes to the security access as noted on received matrices. However, this process will be ongoing because of the changing roles and projects within campus solutions.

Separation of Duties (Repeat Finding)

Executive Owner: Rodner Wright

		Finding Owner: Agatha Onwunli	Remediation Deadline: January 31, 2018
Details		Risk/Impact	Recommendation
<p>The Registrar's Office has 4 employees with access to authorize, add, and approve students to the graduation module.</p> <p>A similar finding was noted in the prior audit report.</p>		Adequate separation of duties reduce the risk that an ineligible student could be awarded a degree.	Duties should be separated so that one employee does not have the capability to authorize, add, and approve a student to the graduation module. Alternately compensating controls could be implemented for any employee that must have conflicting access.
Status: OPEN	Finding ID: -2	Risk Level: HIGH	Disposition of: Reportable Condition
<p>Remediation Status: Corrected (Not Validated)</p> <p>Management Response & Action Plan:</p> <p>Management's Response:</p> <p>Management submitted the Graduation Report and the Monitoring Controls report on Jan 31, 2018 to the Division of Audit & Compliance. Due to this implementation taking place after the Performance Funding audit period (Fall 2016-Summer 2017) it resulted in a repeat finding; however the corrective action has been submitted and will be tested and validated in future audit.</p> <p>Corrective Action plan:</p> <p>This consists of a business process where the person who places students on applied status will not be the person who awards the degree. A report was developed to review all students that were manually added to the graduation module. The report will be run and reviewed at the end of the semester by the coordinator for student services. The review will ensure that all students placed on applied status had been approved by the departments or the Associate Provost using ETA in iRattler, or emails. The Registrar will then review and approve the report, sign it digitally with the time stamp and store.</p> <p>Please click here to see Previous remediation plan.</p>			

Degree Audit (Repeat Finding)

Executive Owner: Rodner Wright

	Finding Owner: Carl Goodman	Remediation Deadline: December 22, 2017
Details	Risk/Impact	Recommendation
<p>1. Degree audit</p> <p>Degree audits were to be performed to determine whether students met the requirements for graduation. The degree audits were to be performed by employees in the school/college to verify that the student successfully passed all courses in their program.</p> <p>Our review of ten students graduated in summer 2017 disclosed that degree audits were performed and that students generally met the requirements of the curriculum; however, nine of the ten students' Degree Audit forms were not signed off by staff who completed the degree audit. The other one form was signed off by the student's academic adviser prior to the student completing all required courses. However, our test showed that all students met necessary requirements to graduate.</p> <p>2. Course Exception Form</p> <p>Upon review and approval of the academic adviser and the department chair ,students are allowed an exception for taking a course in lieu of a required course in their program. A Degree Progress Course Exception Form was to be completed to document approval for the class exception and provide information used to determine the reason for the exception. The completed Form was to be forwarded to the Registrar's Office to update the student's information in the academic adviser module. The academic adviser and department chair are to approve the class exception. However, our test showed that all students met necessary requirements to graduate.</p> <p>Our review of the ten students showed that four had</p>	<p>1. Degree audit forms not signed off by staff who processed the audit or signed off before all requirements were met may increase risks that students graduate without meeting all requirements. The sign offs provide accountability as to who processed the degree audit.</p> <p>2. Missing course exception forms, justifications, and/or proper approvals of the course exception forms may increase risks of unauthorized course exceptions and students receiving credit for classes that do not meet degree requirement.</p>	<p>1. Degree audit forms should be signed off by staff who complete the degree audit and after all graduation requirements are met.</p> <p>2. All course exceptions should be supported with approved Course Exception forms. The forms should be completed to include adequate justifications and approvals.</p>

<p>course exceptions. Of the four students, one's Course Exception form did not include justification to determine the reason for the exception. In addition, the student does not have Course Exception forms for three other courses for which a course was allowed in lieu of a required course. Another student's Course Exception form was only approved by the department chair, although approvals are required from both the academic adviser and the department chair.</p> <p>Similar findings were noted in our prior audit report.</p>			
Status: OPEN	Finding ID: -3	Risk Level: MEDIUM	Disposition of: Reportable Condition
<p>Remediation Status: Corrected (Not Validated)</p> <p>Management Response & Action Plan:</p> <ol style="list-style-type: none"> 1. Instructions were provided to major academic officials (academic deans, associate deans and academic coordinators/directors) on the use of course exception forms, as well as conducting degree audits over the past nine months or during the Spring 2017 and Fall 2017 semesters. 2. An email was forwarded on December 14, 2017, to the schools/colleges regarding the Academic Advisement. Report for the Fall 2017 candidates and the procedures for completing course exception forms. 			

Updates to the Academic Advisement module

Executive Owner: Rodner Wright

		Finding Owner: Carl Goodman	Remediation Deadline: April 30, 2018
Details		Risk/Impact	Recommendation
<p>Manually prepared student Degree Audits included data that differed from data in the Academic Advisement module. For example, some instances were noted in which courses used in the manually prepared degree audit were not shown on the Academic Advisement report. Additionally, neither Course Exceptions nor grade requirements were included in the Academic Advisement module. Academic Advisement module report supports and house these requirements; therefore, the schools/colleges have not updated the AA report as required.</p>		<p>Updating the Academic Advisement module lowers the risk that degrees will be awarded to unqualified candidates by:</p> <ol style="list-style-type: none"> 1. Streamlining the process by allowing academic advisors to review each student's graduation requirements and course exceptions forms in a centralized area as well as showing any anomalies. 2. Ensure students are assigned to one curriculum to fulfill their graduation requirements. 3. Allows the registrar's office to review each student's graduation requirements and approvals of any exceptions in one centralized area. 	<p>All curriculums, grade requirements, and course exception forms should be placed in the Academic Advisement module to ensure the Academic Advisement module includes information needed to verify that students fulfil all graduation requirements.</p>
Status: OPEN	Finding ID: -4	Risk Level: MEDIUM	Disposition of: Reportable Condition
<p>Remediation Status: Not Corrected (Not Started)</p> <p>Management Response & Action Plan:</p> <p>Corrective Action:</p> <p>A curriculum validation training in April 2018 will be held to address all schools/colleges major academic officials to ensure they are aware of the Academic Advisement requirements and purpose. A memo will be issued to all schools/colleges requiring the following:</p> <ol style="list-style-type: none"> 1. All curriculums will be required to be in the Academic Advisement (AA) module for students graduating in the 2017-2018 academic year and prior. 2. All Course Exceptions will be in the AA module 3. If there are any grading requirements(i.e. for core courses) they will be listed in the AA module 4. Update AA module as changes in the curriculums are approved. 			



STATE
UNIVERSITY
SYSTEM
of FLORIDA
Board of Governors

Performance Based Funding

March 2018 Data Integrity Certification

Name of University: Florida A & M University



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.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
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.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Improvements are needed regarding IT access and separation of duties.
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.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
4. In accordance with Board of Governors Regulation 3.007, my university shall provide accurate data to the Board of Governors Office.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
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.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	

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.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
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.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
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.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
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."	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
10. I am responsible for taking timely and appropriate preventive / corrective actions for deficiencies noted through reviews, audits, and investigations.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
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.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	

Performance Based Funding Data Integrity Certification

Performance Based Funding Data Integrity Certification Representations			
Representations	Yes	No	Comment / Reference
<p>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.</p>			
<p>Certification: <u></u> Date <u>2/20/18</u></p> <p style="margin-left: 150px;">President</p>			
<p>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.</p>			
<p>Certification: <u></u> Date <u>3/5/18</u></p> <p style="margin-left: 150px;">Board of Trustees Chair</p>			