

UNIVERSITY OF FLORIDA

OFFICE OF INTERNAL AUDIT

Audit of:	University of Florida Performance Based Funding – Data Integrity
Period of Audit:	As of September 30, 2015
Report Issue Date:	November 9, 2015
Report Number:	UF-16-674-11

UNIVERSITY OF FLORIDA

PERFORMANCE BASED FUNDING – DATA INTEGRITY

As of September 30, 2015

TABLE OF CONTENTS

EXECUTIVE SUMMARY.....	1
AUDIT REPORT.....	2
Scope and Objectives.....	2
Background.....	2
Overall Conclusion.....	5
Attachment A: Performance Based Funding Data Integrity Certification	
Attachment B: Board of Governors Performance Based Funding Metric Definitions	
Attachment C: Performance Based Funding Model – Final Scores for 2014-2015 and 2015-2016	
Attachment D: Overview of the University SUDS Submission Data and Process Flows	
MANAGEMENT RESPONSE.....	14




Office of the President
Office of Internal Audit

903 W. University Avenue
PO Box 113025
Gainesville, FL 32611-3025
352-392-1391
352-392-3149 Fax
<http://oia.ufl.edu>

November 9, 2015

MEMORANDUM

TO: UF Board of Trustees Audit and Operations Review Committee

FROM: Brian D. Mikell, CPA
Chief Audit Executive 

SUBJECT: Performance Based Funding – Data Integrity audit

We audited the University of Florida's data submission process related to data metrics used for the BOG's performance based funding initiative, as of September 30, 2015. The attached report defines the scope of our audit and contains analysis and comments.

Please call me if you have any questions regarding the contents of the audit report.

BDM:dh

cc: President Fuchs
Provost and Sr. Vice President
Sr. Vice President and COO
Assistant Provost and Director, Institutional Planning and Research
Auditor General

PERFORMANCE BASED FUNDING – DATA INTEGRITY

EXECUTIVE SUMMARY

The Florida Legislature has called upon the State University System (SUS) of Florida to reach new levels of efficiency, academic quality and accountability. During fiscal year 2014-2015, the Board of Governors (BOG) implemented a performance based funding (PBF) model, which is intended to build upon the BOG's strategic plans and goals and annual accountability reports. This model seeks to further elevate the SUS while acknowledging each university's distinct mission.

The integrity of the data provided to the BOG by the universities is critical to the PBF decision-making process. Therefore, the BOG developed a Performance Based Funding Data Integrity Certification to provide assurances that the data submitted is reliable, accurate, and complete. This certification form is to be executed by the university President, affirmatively certifying each representation and/or providing an explanation as to why the representation cannot be made as written. The certification form is also to be approved by the university Board of Trustees (BOT) and certified by the BOT Chair.

On June 25, 2015, the Chairman of the BOG instructed each university BOT to "direct its Chief Audit Executive to perform, or cause to have performed by an independent audit firm, an audit of the university's processes which ensure the completeness, accuracy and timeliness of data submissions to the Board of Governors." This audit will provide an objective basis of support for the President and BOT Chair to certify the required representations.

The Office of Internal Audit conducted an audit, as of September 30, 2015, of the University of Florida's data submission process related to data metrics used for the BOG's PBF initiative. The primary objective of this audit was to determine the adequacy of university controls in place to promote the completeness, accuracy, and timeliness of these data submissions to the BOG.

Based on the results of our audit procedures, we concluded that controls over the university's data submission process were adequate to promote the completeness, accuracy, and timeliness of submitted data relative to the BOG's PBF initiative. Our conclusion of "adequate" indicates that controls were in place and functioning as designed.

PERFORMANCE BASED FUNDING – DATA INTEGRITY

AUDIT REPORT

Scope and Objectives

On June 25, 2015, the Chairman of the Board of Governors (BOG), instructed each university board of trustees to “direct its Chief Audit Executive to perform, or cause to have performed by an independent audit firm, an audit of the university’s processes which ensure the completeness, accuracy and timeliness of data submissions to the Board of Governors.”

We have completed an audit, as of September 30, 2015, of the university’s data submission process related to data metrics used for the BOG’s performance based funding initiative. The primary objective of this audit was to determine the adequacy of university controls in place to promote the completeness, accuracy, and timeliness of these data submissions to the BOG.

Because of the inherent limitation in the application of such controls, errors or irregularities may, nevertheless, occur and not be detected. Also, assurances regarding the adequacy of internal controls cannot be projected to future periods due to the risk that procedures may become inadequate because of changes in conditions or compliance with procedures may deteriorate.

We conducted the audit in accordance with the International Standards for the Professional Practice of Internal Auditing as promulgated by the Institute of Internal Auditors. The audit fieldwork was conducted from September 24, 2015 through October 20, 2015 in accordance with the 2015-2016 audit work plan, amended pursuant to the BOG directive to the University of Florida Board of Trustees (BOT).

Background

The Florida Legislature has called upon the State University System (SUS) of Florida to reach new levels of efficiency, academic quality and accountability. In 2014-2015 the BOG implemented a performance based funding (PBF) model, which is intended to build upon the BOG’s strategic plans and goals and annual accountability reports. This model seeks to further elevate the SUS while acknowledging each university’s distinct mission.

The integrity of the data provided to the BOG by the universities is critical to the performance based funding decision-making process. Therefore, the BOG developed a Performance Based Funding Data Integrity Certification to provide assurances that the data submitted to the BOG for PBF decision-making is reliable, accurate, and complete. This certification form is to be executed by the university President, affirmatively certifying each representation and/or providing an explanation as to why the representation cannot be made as written. The

certification form is also to be approved by the BOT and certified by the BOT chair. This audit will provide an objective basis of support for the President and BOT chair to certify the required representations (See Attachment A).

The PBF model has four stated guiding principles:

- Use metrics that align with SUS Strategic Plan goals
- Reward excellence or improvement
- Use a few clear, simple metrics
- Acknowledge the unique mission of the different institutions

The PBF Model includes ten metrics that evaluate the institutions on a range of issues:

- Eight of the ten metrics are common to all institutions. These include metrics on employment after graduation, cost of degree, graduation rates, academic progress, programs of strategic emphasis, and access to the university.
- One metric focuses on areas of improvement and distinct missions of each university. For the University of Florida, this metric is the number of awards that faculty have earned.
- The final metric is chosen by each university BOT from the remaining metrics in the University Work Plans that are applicable to their mission. The University of Florida BOT selected total research expenditures.

Attachment B identifies the BOG Performance Based Funding Metric Definitions

Attachment C identifies the University of Florida's final scores for the 2014-2015 and 2015-2016 allocations

The BOG Regulation 3.007, State University System (SUS) Management Information System, states the SUS universities shall provide accurate data to a management information system established and maintained by the BOG Office. The BOG has created a web-based State University Data System (SUDS) Master File Submission Subsystem for the SUS to report their data.

The number of files the university uploads is dependent on the submission type. Once all required files and any desired optional files for the submission are uploaded, the user checks the submission based on edit and standard reports provided by SUDS. The SUDS system will identify errors which may cause the file to be rejected. These errors should be corrected on the source file and uploaded to the system to be checked again. This process is iterated until the submission is free of all significant errors and/or the errors are explained. Once that is accomplished, the university is ready to 'officially' submit the data to the BOG for approval.

Once submitted, BOG staff reviews the results, error explanations, and standard reports. The submission will either be accepted or rejected. If rejected, then the reason will be posted to the user and a resubmission requested. If accepted, the submitted data will be promoted to the production database.

Organizational Responsibilities

The Office of Institutional Planning and Research (OIPR) is responsible for providing university management with information that supports institutional planning, policy formation and decision making; coordinating responses to inquiries for university-related information; serving as a comprehensive source for information about the institution; and for administering the BOG data collection/reporting system on campus.

The OIPR consists of a Data Administrator (DA), appointed to certify and manage the submission of data and eleven other staff responsible for overseeing the BOG requests as well as requests from other external institutions. The OIPR received approximately 740 data requests each year of which 25% were from the BOG.

The data owners at the university consist of core offices responsible for the extraction and compilation of the information that support the PBF metrics and other data requests. Core offices capture and generate the data and are responsible for reviewing and correcting information in the data systems prior to the submission through SUDS. The following offices/units were responsible for compiling the PBF metrics and were included within the scope of this audit:

- **Office of University Registrar (OUR):** Responsible for student information data used to create the student information files (SIF, SIFP, and SIFD). This data was used in multiple metrics involving graduation, retention, academic progress, and strategic emphasis.
- **Student Financial Affairs (SFA):** Responsible for the financial aid award data used to create the SFA file. This data was used in Metric 7 – University Access Rate.
- **Chief Financial Officer (CFO):** Responsible for the operating budget data which was used to create the Operating Budget (OB) file. The information in the OB file and the Instructional and Research Data (IRD) file was used by the BOG to create the Expenditure Analysis (EA). This information was used in Metric 3 – Average Cost per Bachelor's Degree.
- **OIPR:** Responsible for compiling information into the IRD file for the BOG to create the EA file. Extensive IT support was used to extract information from the Effort Reporting System for faculty workload and Classification of Instruction (CIP) code. This information was used in Metrics 3, 6, and 8a.
- **Cost Analysis:** This office was responsible for compiling the cost of research expenditures reported in the National Science Foundation Higher Education Research and Development Survey (HERD). This information is used by the BOG for Metric 10f – Total Research Expenditures.
- **Enterprise Systems (ES):** This unit provided information technology (IT) support to the various other units and was directly responsible for maintaining certain systems as well as compiling data and generating reports from those systems for the other core offices.

- **Center for Measuring University Performance:** The center is an independent organization which currently resides at Arizona State University and the University of Massachusetts Amherst with support from the University of Florida Foundation and the University at Buffalo. The staff and advisors from various universities, including UF, are responsible for compiling and publishing data for universities through their Annual Report of Top American Research Universities (TARU). The data for Metric 9b – Number of Faculty Awards was compiled by the BOG from the TARU.

After the upload by the data owners, the SUDS edit check summaries require further review for exceptions and necessary comments. This was an iterative process between the data owners, IT and the OIPR to address any significant exceptions in the summaries and formalize comments for the noted exceptions. The OIPR then performed a final review to evaluate the data accuracy prior to submission to the BOG for their approval. If the BOG accepted the file, then no further procedures were necessary for that submission. If the BOG rejected the file, then the data needed to be researched and corrected for reload and resubmission into SUDS until it received BOG approval.

Attachment D is a flowchart summarizing the data and process flows from extraction through the BOG approval.

Prior Audit Comments

An internal control audit of Performance Based Funding – Data Integrity was performed as of September 30, 2014, with audit report UF-15-663-17 issued February 9, 2015. Enhancements were implemented relative to access control policies and procedures for SUDS. The OIPR and owners of source data also enhanced documentation of their due diligence review procedures for the PBF submissions. The DA plans to submit an annual report to the President summarizing the due diligence procedures performed in January 2016 for the March 2016 certification statement.

Overall Conclusion

To identify and evaluate the controls in place relative to the university's data submissions in support of the PBF metrics, we conducted employee interviews, performed analytical reviews, evaluated risks related to each metric, reviewed program codes, performed process walkthroughs, and tested reported values to source data.

Based on the results of our audit procedures, we concluded that controls over the university's data submission process were adequate to promote the completeness, accuracy, and timeliness of submitted data relative to the BOG's PBF initiative.

A management letter was issued in concurrence with the audit report to communicate other comments and observations that did not warrant inclusion in the report due to lack of significance or relation to the scope of the audit.

DATA ADMINISTRATOR (DA)

BOG Regulation 3.007(2) states that each university President shall appoint an Institutional DA to certify and manage the submission of data to the SUS management information system. The Director of the OIPR has been officially charged with being the DA for the university. We observed a letter of formal appointment by the President which identified the Director's role as DA for the university since 2006. The Director's job description clearly defined her role as the DA. The DA and her staff are charged with ensuring that the university will provide accurate data to a management information system established and maintained by the BOG Office.

Responsibilities include:

- Ensuring the data is complete and in the correct format, and meets the specifications and criteria established by the BOG Data Committee.
- Prior to submission, test the file's consistency with established criteria using application/processes provided by the BOG Information Resource Management (IRM) Office. Submission must include a written explanation of critical errors.
- Timely submission of the file to the Director of IRM, or designee, pursuant to the established schedule.
- Certifying that the file/data represents the position of the university for the term being reported.
- Preparation and timely submission of a revised data file when the BOG rejected the original file.

OIPR Review and Edit Procedures

BOG Regulation 3.007(5)(a) requires that the DA shall prepare and submit the data file to the Director of IRM, or the Director's designee, pursuant to the schedule set forth in the submissions section of the specification for each file. The BOG develops a calendar of due dates for each submission and provides this information in the annual Higher Education Summit/SUS Data Workshops and on the SUDS submission screens.

Extensive procedures are performed by the data owners during their data extraction and review, and by the OIPR during their data review and submission. Consistent communication between the OIPR and the data owners is critical to coordinate these procedures in order to meet the required deadlines. A Data Request System (DRS) was developed by the OIPR to facilitate communication, documentation and monitoring of data requests. In response to a prior audit action plan, OIPR implemented a Data Owner Certification Statement during the year in which each Data Owner would summarize the work performed, verify support was maintained, and certify the file was ready for submission.

We noted comprehensive written procedures were in place to document the OIPR's submission process including work initiation, work in progress, quality control and data release procedures. Also in response to a prior audit action plan, a Review Status Form was implemented during

the year that identified review steps performed by OIPR staff and captured staff sign-off that the review had been completed.

We performed walk-throughs of the documented quality control processes for the SIF, SIFD, IRD and EA files by reviewing supporting documentation contained within the DRS, and emails between the OIPR, data owners and the BOG.

We tested the timeliness of submissions by reviewing all 14 submissions related to PBF from October 1 2014 through September 30, 2015. All submissions were timely, submitted by the appropriate staff, included explanations of any errors, and were accepted by the BOG. Three of the submissions (IRD, EA, and SIF) reviewed required resubmission due to exceptions. None of the exceptions had a material effect on the data. We observed that all submissions subsequent to the prior audit action plans implementation had a Certification Statement from the data owner and a Review Status form completed by the OIPR.

Based on the results of our review, we conclude that the OIPR employed adequate review and edit processes, including appropriate documentation of their procedures.

DATA OWNERS

To understand the requirements for complete and accurate submissions, we reviewed the SUDS Data Dictionary, documentation from SUS data workshops, and BOG Methodology and Procedures applicable to the PBF submissions. The BOG issues annual notices communicating updates for institutional reporting of certain data based on the results of SUS data workshops. Depending on the required changes, the university may need to modify program code. An example of a BOG change might be a requirement that budget carryforward be included in the calculations where it was not included in previous years.

After gaining an understanding of the submission requirements, we reviewed key procedures for each data owner related to the extraction, compilation, and review of their data to ensure completeness and accuracy of the submission. We performed a risk analysis of the metrics reported, taking into consideration changes in internal procedures for extraction, review, and submission processes. We also considered staffing changes, the significant changes in reporting between years, variances in the data reported, and points received. Our risk assessment results led us to focus primarily on the OUR and the OIPR.

The following is a summary of our review and conclusions for each data owner.

Office of University Registrar (OUR)

The Student Records System is the authoritative system of record (master data) for the SIF, SIFP, and SIFD. Metric submissions generated from these records involve graduation, retention, academic progress, and information regarding the programs of strategic emphasis (STEM programs).

The OUR had developed automated quality control checks that determined whether the data was within the BOG-expected parameters and allowed them to review the student data on a daily basis and make corrections, as necessary, prior to the SUDS submission. Data from the Student Records System was provided to the OIPR nightly. The OIPR used this data to develop a daily enrollment tracking system used by administrators across campus, which provided the ability for daily review and communication of student information so that corrections could be identified and made in a timely manner.

We reviewed written procedures with core office staff to determine if there were any significant changes in staffing or the extraction and review processes. The written procedures specifically addressed change management controls processing and review of ad hoc reports, production jobs, and uploads.

The documented procedures indicated that controls for program change management were in place for both Production scheduled jobs and the Ad Hoc generated reports. Access to production libraries were limited to personnel who were authorized to make changes. The SUDS submissions log identified the initiator for each upload and submission. This compensating control limited the risk of an improper submission to an acceptable level and maintained accountability for changes and submissions.

The core office employed good automated continuous monitoring procedures as well as separate layering of reviews to help assure the student data was accurate. We observed conscientious staff performing adequate quality control procedures prior to the final review by the DA.

We tested a random sample of 100 student records from the SIF and SIFD Spring 2015 submissions by tracing them to the system of record to verify the accuracy of key elements identified in the BOG Methodology and Procedures. We found no exceptions for the sampled data elements.

Based on the results of our review, we conclude that the OUR's processes for extraction, review and upload of student data to the SUDS was adequate.

Student Financial Affairs (SFA)

The primary role of SFA is to provide financial resources to students who would otherwise be unable to receive post-secondary education. PBF Metric 7, University Access Rate, was

defined as the percentage of undergraduates with Pell grants. SFA was responsible for compiling information used in the SFA file submission.

We reviewed SFAs documented procedures for data extraction, review and upload, noting any changes since the prior audit including staffing, processing, reporting, uploading, and BOG reporting requirements. SFA had enhanced documented procedures since our prior audit to better identify processes necessary to extract and review the data for completeness and accuracy. Based on the results of our review, SFA employed adequate processes to ensure data accuracy, completeness, and timely creation of the load file.

Chief Financial Officer (CFO)

The PBF Metric 3, Average cost Per Bachelor's Degree, was based on direct and indirect instructional expenditures. The BOG calculated the average cost from the data included in the IRD, EA and OB files.

The Assistant Vice President of University Budgets (AVP) reports to the CFO and has been charged with compiling the OB file. The AVP, with the assistance of Enterprise Systems (ES), creates the OB file by running programs that combine files and information from the general ledger. Prior to the build of the submission file, the AVP runs queries from *myUFL* to better categorize benefit plan expenditures, risk management insurance, and financial aid to meet the BOG's requirements.

We performed a review of controls at the IT and data owner level including edit processes, error correction, data extraction and upload processes. We observed that control procedures were in place to verify the data accuracy, program change management, and reporting consistency. Collectively, those controls helped to ensure data accuracy and completeness, as well as timely operation for creating the load files.

The risk management, student financial aid, and fringe benefit expenses impact the average cost of a bachelor's degree. We reviewed the AVP's revised procedures for preparing the risk management, student financial aid, and fringe benefits expenses submitted in the 2015-2016 OB file on August 17, 2015. The procedures had been updated with the specific amounts used in the data compilations. We verified that the Budget Office used the new SUDS OB error report to ensure that the OB file aligned with the SUDS data. We also observed that the OIPR performed their review and maintained emails with the AVP to document its reviews of questionable items. The AVP provided the certification attesting the accuracy of the data provided.

We concluded that the AVP's procedures and IT controls to compile the OB file data were adequate to provide complete, accurate and timely data for the OB submission.

Office of Institutional Planning and Research (OIPR)

The OIPR was also directly involved with PBF Metric 3, Average cost Per Bachelor's Degree and Metrics 6 and 8a involving programs of strategic emphasis. Metric 3 included information derived from the Effort Reporting System. Metrics 6 and 8a included information from Classification and Instruction tables (CIP Codes). The OIPR had a role in assigning CIP codes, in collaboration with other academic administrators, through the Academic Approval Process and acted as a data owner because they were responsible for compiling and adding this information to the IRD and the EA file submissions.

The IRD files were created by programs developed by ES. The OIPR's role was to ensure that the Effort Reporting System data was complete prior to the IRD file creation. For example, the Effort Reporting System has edits to ensure that faculty time percentages sum to 100%. If this requirement was not met, then there was an error message that had to be cleared.

The SUDS system generates an EA file from the OB and IRD data. The EA file is downloaded and additional programming was used to add the CIP codes to the records on the file. We noted that the process to compile the EA file had not changed from the previous year.

We determined that adequate IT controls were identified in the documented procedures used to create the EA file. Control procedures were in place to verify the accuracy of data, program change management, and data extraction repeatability and consistency. Collectively, those controls helped to ensure data accuracy, completeness, as well as timely operation for creating the load files.

The OIPR had implemented a Review Status (checklist) documenting the appropriate review procedures were completed for the OB, IRD, and the EA files. We also reviewed the OIPR's quality control procedures supported by emails documented in their Data Request System and samples of other supporting documentation. We noted the AVP's Certification of the OB and Review Status form for the IRD file was used to document the performance of the review and status of each quality control step. We observed that the review by OIPR for completeness of the course sections used for the effort reporting was in place. The university also required certification by individuals of the reported amounts for time spent on course instruction, which helped to validate the accuracy of reported instructional effort.

We concluded that adequate processes were in place for the extraction and compilation of the data in the IRD and OB files.

Cost Analysis

The PBF Metric 10f, Total Research Expenditures, was an institutional specific metric selected by the University of Florida BOT. The BOG obtains this information directly from the National Science Foundation's annual Higher Education Research and Development Survey (HERD).

We reviewed updated written procedures with core office staff to determine any significant changes in staffing, extraction and review processes. Specific procedures regarding queries used to generate the research related expenditures and review and submission of the HERD survey was documented.

Cost Analysis was responsible for responding to the NSF HERD survey and had developed queries using general ledger data to identify all university research-related expenses. Tables between the general ledger and the research award system were combined to identify funds, program codes, expense accounts and award codes. Award codes were assigned by the Office of Research when recording the award. Cost Analysis ran a query that pulled the award codes from the award system and matched the award data to the general ledger queries through Access programs to identify research expenditures for the year reported. Prior to running the queries, Cost Analysis staff reviewed the HERD instructions for any changes as well as the university's system for new data sources, funds, or program codes. They also met with the Office of Research to discuss the current year reporting.

Based on our review of written procedures, we concluded that adequate processes were in place to report amounts in the HERD survey.

Center for Measuring University Performance

The Center for Measuring University Performance (the Center) is an independent organization which currently resides at Arizona State University and the University of Massachusetts Amherst, with support from the University of Florida Foundation and the University at Buffalo. The staff and advisors from various universities, including UF, are responsible for compiling and publishing data for universities through their Annual Report of Top American Research Universities (TARU). The data for Metric 9b, Number of Faculty Awards, was compiled by the BOG from the TARU to document the number of faculty awards for UF and FSU.

We interviewed the UF staff member who served as a volunteer of the center and was responsible for compiling some data used in the TARU. Based on this interview and information provided by the Center, the number of faculty awards was compiled by utilizing web-based directories of awarding institutions and agencies. The volunteer was responsible for gathering and compiling the award information from some of the grant and fellowship programs including National Institute of Health MERIT (NIH), National Science Foundation CAREER awards, and the Presidential Early Career Awards for Scientists and Engineers (PECASE). To verify the accuracy of the awards reported we traced the supporting documentation to the web-based directories of the awarding institutions. The number of awards identified in the support was in agreement with the reporting institution. The data collected was placed by our volunteer in a shared drive and compiled by the research director and staff at the University of Buffalo. The remaining processes performed to create the TARU was considered an independent report with objective data for which we determined no further work was necessary.

OTHER COMMENTS

Resubmissions

BOG Regulation 3.007(5)(c) requires that the DA shall prepare and submit a revised data file within the time period specified by the SUS DA, in the event of a rejection of a data file. Resubmissions are typically an iterative process between the BOG, the DA and the data owners to correct data errors identified by the SUDS edit process. Resubmissions may also be necessary in the event the university finds errors in its reporting system or the BOG does not agree with the comments on errors identified in the SUDS review process.

We reviewed the DA's data resubmissions to the BOG to ensure these resubmissions were both necessary, authorized, and were not indicative of any inherent problems in the submission process. The DA provided all resubmissions for the past year and we evaluated all resubmissions that pertained to the PBF metrics through the SUDS system.

Based on the results of our review, resubmissions initiated by the DA were limited to the IRD and EA files during our audit period and did not appear to indicate any inherent problems with the data submission process. Other resubmission of the SIF file was due to limited data errors. The need for the resubmissions at the university did not appear to be a systematic problem and generally consisted of individual data changes that would have no impact on the PBF metrics.

SUDS System Access Control

Data upload and submissions to the BOG were performed through a secure website. The DA was assigned the role of Data Administrator for the SUDS System by the BOG System Administrator. The DA's role was the highest level assignable at the institution and was assigned to only one individual at each SUS institution.

The DA and five other OIPR staff were the only individuals authorized to process submissions. In addition, the DA and two OIPR staff were the only individuals with the ability to create end-user roles and grant access to those that will process their data. Users were also restricted to the submissions they have been authorized by the DA to act upon. Any user could also be designated as a Security Manager, which allowed the user to change passwords and add other users. As of September 2015, there were 50 people with role access, of which three were Security Managers.

Procedures required formal written request for access signed by the supervisor of the requestor. The DA reviews the request and performs the approval in SUDS. Monitoring was performed monthly by comparing changes in university personnel records to the list of users. We observed a September 2015 monitoring report and correspondence between the OIPR staff over the approval and monitoring process. Based on our review we observed that the adequate controls were in place over authorization and monitoring of SUDS access.

General Comment

We wish to express our appreciation to the management and staff of the Office of Institutional Planning and Research, the Office of the Vice President and Chief Financial Officer, Enterprise Systems, the Office of the University Registrar, the Office for Student Financial Affairs, and Cost Analysis for the courtesy and cooperation extended to us during this review.

Audit Supervised by: Joe Cannella

Audit Conducted by: Craig Reed
Jeff Capehart
Lily Reinhart
Emmy Kahn
Brandon Esposito



STATE
UNIVERSITY
SYSTEM
of FLORIDA
Board of Governors

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).

Performance Based Funding Data Integrity Certification Representations				
Representations	Yes	No	N/A	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 type="checkbox"/>	<input 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 type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
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.	<input type="checkbox"/>	<input 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 type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

Performance Based Funding Data Integrity Certification

Performance Based Funding Data Integrity Certification Representations				
Representations	Yes	No	N/A	Comment / Reference
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 type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
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.	<input type="checkbox"/>	<input 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 type="checkbox"/>	<input 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 type="checkbox"/>	<input 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 type="checkbox"/>	<input 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 type="checkbox"/>	<input 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	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

Performance Based Funding Data Integrity Certification

Performance Based Funding Data Integrity Certification Representations				
Representations	Yes	No	N/A	Comment / Reference
University System Strategic Plan goals and have not been made for the purposes of artificially inflating performance metrics.				
<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: _____ Date _____</p> <p style="margin-left: 40px;">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: _____ Date _____</p> <p style="margin-left: 40px;">Board of Trustees Chair</p>				

Board of Governors

Performance Based Funding Metric Definitions

(as reported in the Annual System Accountability Report)

METRICS COMMON TO ALL UNIVERSITIES		
	METRIC	DEFINITION
1	Percent of Bachelor's Graduates Employed Full-time in Florida or Continuing their Education in the U.S. One Year After Graduation	<p>This metric is based on the percentage of a graduating class of bachelor's degree recipients who are employed full-time or continuing their education somewhere in the United States. Students who do not have valid social security numbers and are not enrolled are excluded.</p> <p>Note: This data now includes non-Florida employment data.</p> <p>Sources: <i>State University Database System (SUDS)</i>, <i>Florida Education & Training Placement Information Program (FETPIP)</i>, <i>analysis of Wage Record Interchange System (WRIS2)</i> and <i>Federal Unemployment Data Exchange (FEDES)</i>, and <i>National Student Clearinghouse</i>.</p>
2	Median Wages of Bachelor's Graduates Employed Full-time in Florida One Year After Graduation	<p>This metric is based on annualized Unemployment Insurance (UI) wage data from the fourth fiscal quarter after graduation for bachelor's recipients. UI wage data does not include individuals who are self-employed, employed out of state, employed by the military or federal government, those without a valid social security number, or making less than minimum wage.</p> <p>Sources: <i>State University Database System (SUDS)</i>, <i>Florida Education & Training Placement Information Program (FETPIP)</i>, <i>National Student Clearinghouse</i>.</p>
3	Average Cost per Bachelor's Degree <i>Instructional costs to the university</i>	<p>For each of the last four years of data, the annual total undergraduate instructional expenditures were divided by the total fundable student credit hours to create a cost per credit hour for each year. This cost per credit hour was then multiplied by 30 credit hours to derive an average annual cost. The average annual cost for each of the four years was summed to provide an average cost per degree for a baccalaureate degree that requires 120 credit hours.</p> <p>Sources: <i>State University Database System (SUDS)</i>, <i>Expenditure Analysis: Report IV (2010-11 through 2013-14)</i>.</p>
4	Six Year FTIC Graduation Rate	<p>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. Students of degree programs longer than four years (e.g., PharmD) are included in the cohorts. Students who are active duty military are not included in the data.</p> <p>Source: <i>State University Database System (SUDS)</i>.</p>
5	Academic Progress Rate <i>2nd Year Retention with GPA Above 2.0</i>	<p>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).</p> <p>Source: <i>State University Database System (SUDS)</i>.</p>

Board of Governors
Performance Based Funding Metric Definitions
(as reported in the Annual System Accountability Report)

METRICS COMMON TO ALL UNIVERSITIES		
	METRIC	DEFINITION
6	Bachelor's Degrees Awarded within Programs of Strategic Emphasis <i>(includes STEM)</i>	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 (i.e., double-majors are included). <i>Source: State University Database System (SUDS).</i>
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. <i>Source: State University Database System (SUDS).</i>
8a	Graduate Degrees Awarded within Programs of Strategic Emphasis <i>(includes STEM)</i> <i>Note: NCF does not award graduate degrees.</i>	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 (i.e., double-majors are included). <i>Source: State University Database System (SUDS).</i>
8b	Freshmen in Top 10% of High School Class <i>Applies to: NCF</i>	Percent of all degree-seeking, first-time, first-year (freshman) students who had high school class rank within the top 10% of their graduating high school class. <i>Source: New College of Florida.</i>

Board of Governors

Performance Based Funding Metric Definitions

(as reported in the Annual System Accountability Report)

INSTITUTION SPECIFIC METRICS SELECTED BY THE BOARD OF GOVERNORS		
	METRIC	DEFINITION
9a	Percent of Bachelor's Degrees Without Excess Hours <i>Applies to: FAMU, FAU, FIU, FGCU, UCF, UNF, USF, UWF</i>	<p>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.</p> <p>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 mandate 110% of required hours as the threshold. In accordance with statute, this metric excludes the following types of student credits (i.e., 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).</p> <p><i>Source: State University Database System (SUDS).</i></p>
9b	Number of Faculty Awards <i>Applies to: UF, FSU</i>	<p>This metric is based on the number of awards that faculty have earned in the arts, humanities, science, engineering and health fields as reported in the annual 'Top American Research Universities' report. Twenty-three of the most prominent awards are considered, including: Getty Scholars in Residence, Guggenheim Fellows, Howard Hughes Medical Institute Investigators, MacArthur Foundation Fellows, National Endowment for the Humanities (NEH) Fellows, National Medal of Science and National Medal of Technology, Robert Wood Johnson Policy Fellows, Sloan Research Fellows, Woodrow Wilson Fellows, to name a few awards.</p> <p><i>Source: Center for Measuring University Performance, Annual Report of the Top American Research Universities (TARU).</i></p>
9c	National Ranking for Institutional & Program Achievements <i>Applies to: NCF</i>	<p>This metric is based on the number of Top 50 university rankings that NCF earned from the following list of publications: Princeton Review, Fiske Guide, QS World University Ranking, Times Higher Education World University Ranking, Academic Ranking of World University, US News and World Report National University, US News and World Report National Public University, US News and World Report Liberal Arts Colleges, Forbes, Kiplinger, Washington Monthly Liberal Arts Colleges, Washington Monthly National University, and Center for Measuring University Performance.</p> <p><i>Source: Board of Governors staff review.</i></p>

Board of Governors

Performance Based Funding Metric Definitions

(as reported in the Annual System Accountability Report)

INSTITUTION SPECIFIC METRICS SELECTED BY EACH UNIVERSITY'S BOARD OF TRUSTEES		
10a	Percent of R&D Expenditures Funded from External Sources <i>Applies to: FAMU</i>	This metric reports the amount of research expenditures that was funded from federal, private industry and other (non-state and non-institutional) sources. <i>Source: National Science Foundation annual survey of Higher Education Research and Development (HERD).</i>
10b	Bachelor's Degrees Awarded to Minorities <i>Applies to: FAU, FGCU, FIU</i>	This metric is the number, or percentage, of baccalaureate degrees granted in an academic year to Non-Hispanic Black and Hispanic students. This metric does not include students classified as Non-Resident Alien or students with a missing race code. <i>Source: State University Database System (SUDS).</i>
10c	National Rank Higher than Predicted by the Financial Resources Ranking Based on U.S. and World News Report <i>Applies to: FSU</i>	This metric is based on the difference between the Financial Resources rank and the overall University rank. U.S. News measures financial resources by using a two-year average spending per student on instruction, research, student services and related educational expenditures - spending on sports, dorms and hospitals doesn't count. <i>Source: US News and World Report's annual National University rankings.</i>
10d	Percent of Undergraduate Seniors Participating in a Research Course <i>Applies to: NCF</i>	This metric is based on the percentage of undergraduate seniors who participate in a research course during their senior year. <i>Source: New College of Florida.</i>
10e	Number of Bachelor Degrees Awarded Annually <i>Applies to: UCF</i>	This metric is the number of baccalaureate degrees granted in an academic year. Students who earned two distinct degrees in the same academic year were counted twice; students who completed multiple majors or tracks were only counted once. <i>Source: State University Database System (SUDS).</i>
10f	Total Research Expenditures <i>Applies to: UF</i>	This metric is the total expenditures (includes non-science & engineering fields) for research & development activities within a given fiscal year. <i>Source: National Science Foundation annual survey of Higher Education Research and Development (HERD).</i>
10g	Percent of Course Sections Offered via Distance and Blended Learning <i>Applies to: UNF</i>	This metric is based on the percentage of course sections classified as having at least 50% of the instruction delivered using some form of technology, when the student and instructor are separated by time or space, or both. <i>Source: State University Database System (SUDS).</i>
10h	Number of Postdoctoral Appointees <i>Applies to: USF</i>	This metric is based on the number of post-doctoral appointees at the beginning of the academic year. A postdoctoral researcher has recently earned a doctoral (or foreign equivalent) degree and has a temporary paid appointment to focus on specialized research/scholarship under the supervision of a senior scholar. <i>Source: National Science Foundation/National Institutes of Health annual Survey of Graduate Students and Postdoctorates in Science and Engineering (GSS).</i>

Board of Governors
Performance Based Funding Metric Definitions
(as reported in the Annual System Accountability Report)

10i	Percentage of Adult Undergraduates Enrolled <i>Applies to: UWF</i>	This metric is based on the percentage of undergraduates (enrolled during the fall term) who are at least 25 years old at the time of admission. This includes undergraduates who are not degree-seeking, or unclassified. <i>Source: State University Database System (SUDS).</i>
-----	--	---

Attachment C

Metric #	Metric Description	Data and Point Assignment (See Note 1)	Allocation Year	
			2014-2015	2015-2016
1	Percent of Bachelor's Graduates Employed Full-time in Florida or Continuing their Education in the U.S. One Year After Graduation (See Note 2)	Excellence Data	63%	72%
		Improvement Data	0%	5%
		Excellence Points: 5 (80%), 4 (75%), 3 (70%), 2 (65%), 1 (60%)	2	3
		Improvement Points: 5 (5%), 4 (4%), 3 (3%), 2 (2%), 1 (1%)	0	5
		Higher Score	2	5
2	Median Wages of Bachelor's Graduates Employed Full-time in Florida One Year After Graduation (See Note 2)	Excellence Data	\$ 33,100	\$ 34,800
		Improvement Data	6%	5%
		Excellence Points: 5 (\$40,000), 4 (\$35,000), 3 (\$30,000), 2 (\$25,000), 1 (\$20,000)	3	3
		Improvement Points: 5 (5%), 4 (4%), 3 (3%), 2 (2%), 1 (1%)	5	5
		Higher Score	5	5
3	Average Cost per Bachelor's Degree - Instructional costs to the university (See Note 2)	Excellence Data	\$ 24,940	\$ 25,450
		Improvement Data	0%	2%
		Excellence Points: 5 (\$20,600), 4 (\$23,175), 3 (\$25,750), 2 (\$28,325), 1 (\$30,900)	3	3
		Improvement Points: 5 (-5%), 4 (-4%), 3 (-3%), 2 (-2%), 1 (-1%)	0	0
		Higher Score	3	3
4	Six Year FTIC Graduation Rate - Percent of first-time-In-college students who graduate within six years	Excellence Data	86%	87%
		Improvement Data	1%	1%
		Excellence Points: 5 (70%), 4 (67.5%), 3 (65%), 2 (62.5%), 1 (60%)	5	5
		Improvement Points: 5 (5%), 4 (4%), 3 (3%), 2 (2%), 1 (1%)	1	1
		Higher Score	5	5
5	Academic Progress Rate - 2nd Year Retention with GPA Above 2.0	Excellence Data	96%	95%
		Improvement Data	1%	-1%
		Excellence Points: 5 (90%), 4 (87.5%), 3 (85%), 2 (82.5%), 1 (80%)	5	5
		Improvement Points: 5 (5%), 4 (4%), 3 (3%), 2 (2%), 1 (1%)	1	0
		Higher Score	5	5
6	Percent of Bachelor's Degrees Awarded within Programs of Strategic Emphasis (includes STEM) (See Note)	Excellence Data	47%	55%
		Improvement Data	1%	3%
		Excellence Points: 5 (50%), 4 (45%), 3 (40%), 2 (35%), 1 (30%)	4	5
		Improvement Points: 5 (5%), 4 (4%), 3 (3%), 2 (2%), 1 (1%)	1	3
		Higher Score	4	5
7	University Access Rate - Percent of undergraduates with a Pell-grant (See Note)	Excellence Data	32%	32%
		Improvement Data	0%	-1%
		Excellence Points: 5 (30%), 4 (27.5%), 3 (25%), 2 (22.5%), 1 (20%)	5	5
		Improvement Points: 5 (5%), 4 (4%), 3 (3%), 2 (2%), 1 (1%)	0	0
		Higher Score	5	5

Metric #	Metric Description	Data and Point Assignment (See Note 1)	Allocation Year	
			2014-2015	2015-2016
8a	Percent of Graduate Degrees Awarded within Programs of Strategic Emphasis (includes STEM)(See Note)	Excellence Data	59%	70%
		Improvement Data	2%	1%
		Excellence Points: 5 (60%), 4 (55%), 3 (50%), 2 (45%), 1 (40%)	5	5
		Improvement Points: 5 (5%), 4 (4%), 3 (3%), 2 (2%), 1 (1%)	2	1
		Higher Score	5	5
9b	Number of Faculty Awards: applies to UF and FSU only	Excellence Data	18	20
		Improvement Data	-4	2
		Excellence Points: 5 (31), 4 (23), 3 (18), 2 (12), 1 (5)	3	3
		Improvement Points: 5 (5), 4 (4), 3 (3), 2 (2), 1 (1)	0	2
		Higher Score	3	3
10f	Total Research Expenditures: applies to UF only	Excellence Data	697 M	695M
		Improvement Data	-43M	-2M
		Excellence Points: 5 (Top 1/3), 3 (Middle 1/3), 1 (Lower 1/3) of Association of American Universities.	5	3
		Improvement Points: 5 (5%), 4 (4%), 3 (3%), 2 (2%), 1 (1%)	0	0
		Higher Score	5	3
		Total Score	42	44

Note: (1) Scoring is based on the higher of excellence or improvement.

(2) Description of BOG changes to Metrics 1, 3, 6, 7, and 8a are on subsequent pages.

Board of Governors

Performance Based Funding Model

Changes Approved on November 6, 2014

- Metric 1 (Percent of Bachelor's Graduates Employed and/or Continuing their Education Further 1 Yr after Graduation) - Include graduates in the military and federal government and graduates employed outside of Florida.
 - *Adjustment 1: Data is now available from the Department of Economic Opportunity and Florida Education and Training Placement Information Program (FETPIP) to include military & federal government graduates and graduates employed outside Florida.*
 - *Adjustment 2: Exclude graduates who do not have valid social security numbers if they are not found in the enrollment data.*
 - *Benchmarks will be adjusted to reflect the new system average.*

	1 pt	2 pts	3 pts	4 pts	5 pts
Previous	55%	60%	65%	70%	75%
Revised	60%	65%	70%	75%	80%

- Metric 3 (Average Cost per Undergraduate Degree to Institution) - Modify the benchmark to account for increased costs as additional funds are received.
 - *Adjustment: Adjust the benchmark based on the new system average after reviewing 2013-14 expenditure data.*
 - *Benchmarks adjusted to reflect 3% increase in new system average.*

	1 pt	2 pts	3 pts	4 pts	5 pts
Previous	\$30,000	\$27,500	\$25,000	\$22,500	\$20,000
Revised	\$30,900	\$28,325	\$25,750	\$23,175	\$20,600

- Metric 6 (Bachelor Degrees in Strategic Emphasis) (Includes STEM) - Modify the definition to reflect the inclusion of other degrees in Areas of Strategic Emphasis as approved by the Board of Governors November 2013.
 - *Adjustment: In November 2013, the Board approved a new list of strategic emphasis programs. This change aligns the PBF metric to the new categories for degrees awarded in Programs of Strategic Emphasis. The revised list includes: 113 disciplines within STEM, 46 disciplines within Health, 34 disciplines within Education, 24 disciplines within Global Competitiveness, and 10 disciplines identified in the GAP Analysis (i.e. finance, accounting, banking, human resources).*
 - *The Board is not considering changing the 2025 goal for this metric in the System Strategic Plan, so the benchmark does not need to be adjusted.*

Board of Governors

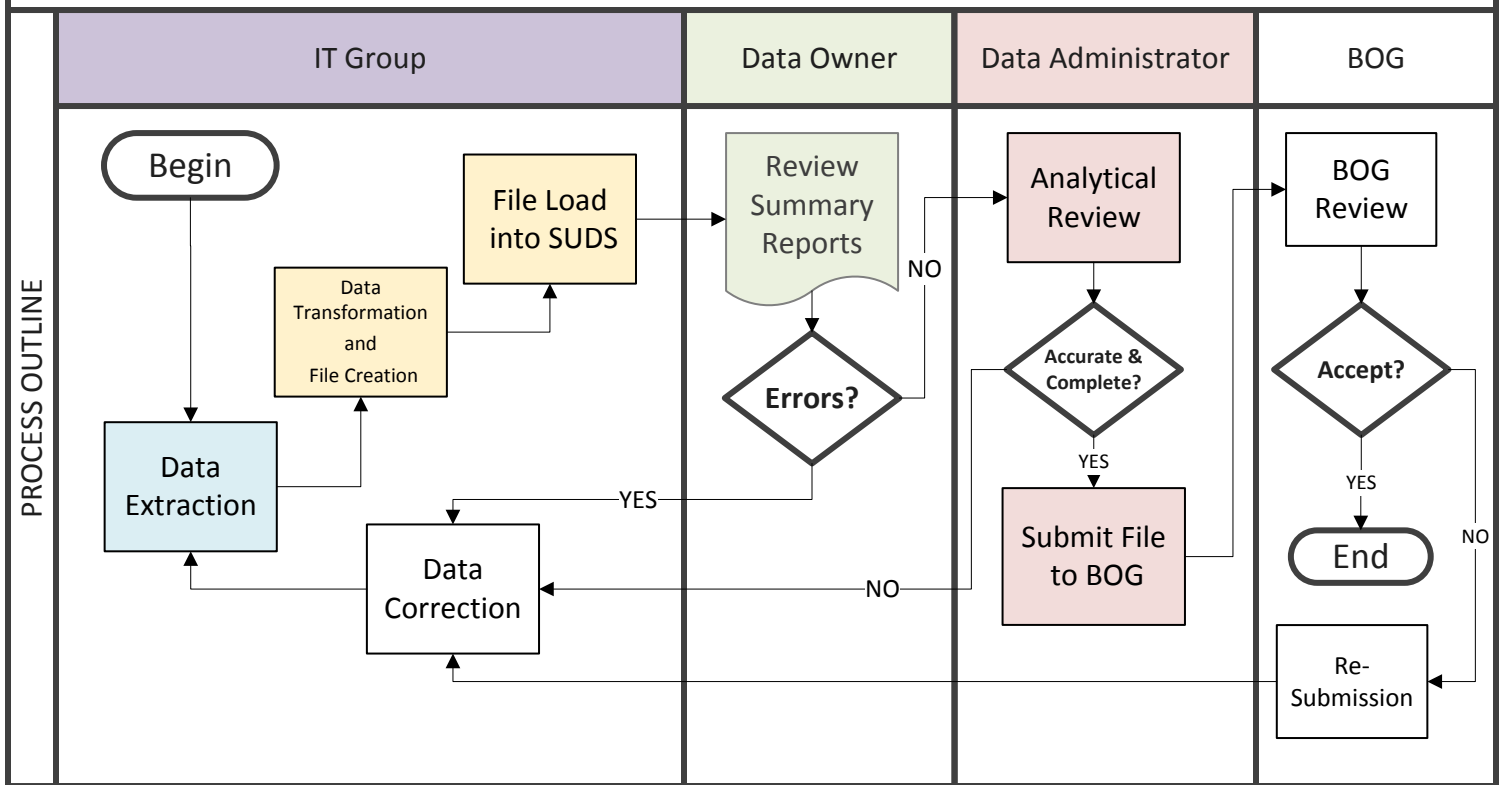
Performance Based Funding Model

Changes Approved on November 6, 2014

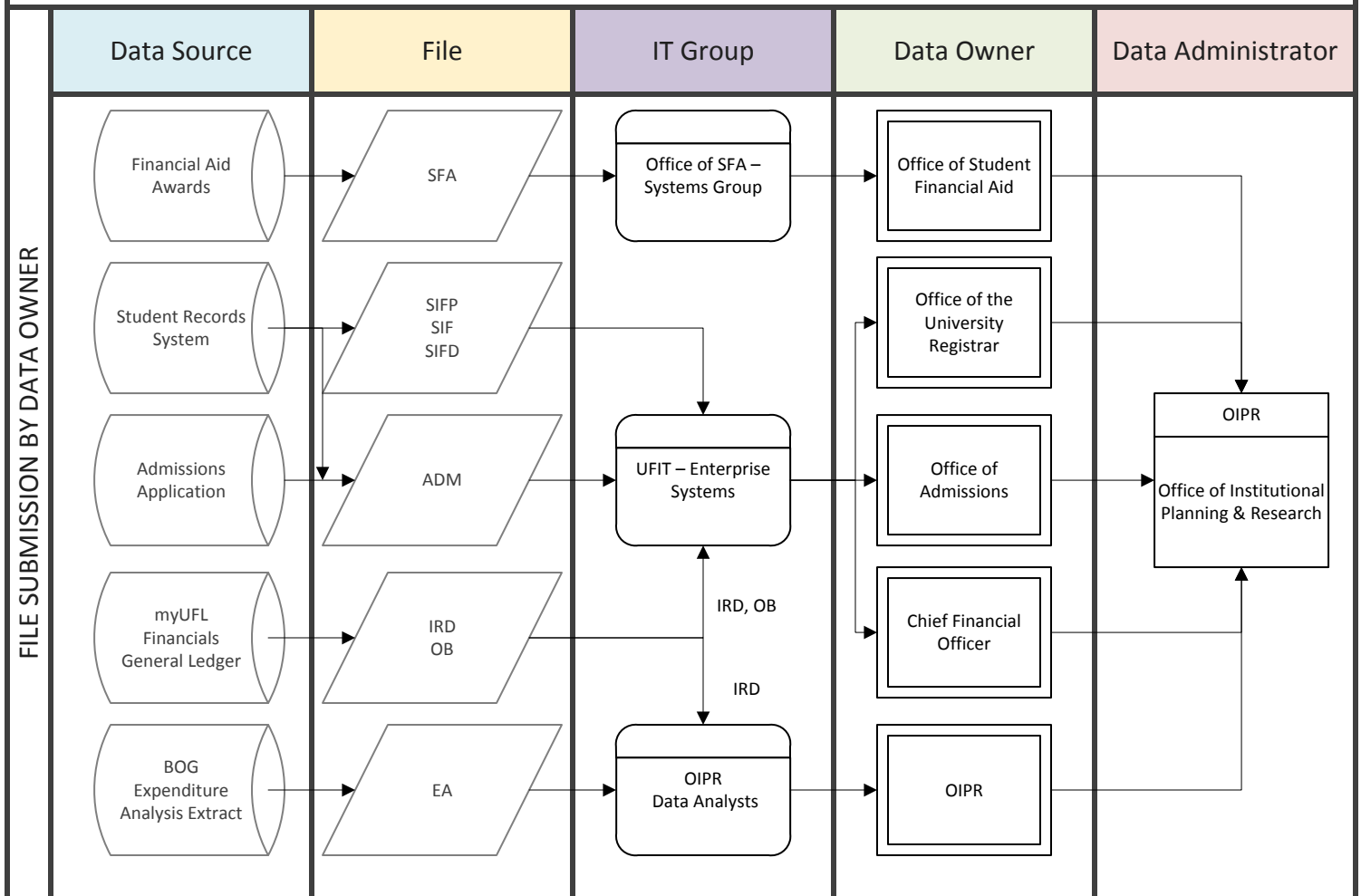
- Metric 7 (University Access Rate) - Exclude non-US students since they are not eligible for Pell Grants.
 - *Adjustment: Non-US students shall be removed from both the numerator and denominator because they typically are not eligible for Pell grants.*
 - *Note: A small percentage of non-US students do receive a Pell grant but these are for special circumstances as detailed by the US Dept of Education – for more information see: <https://studentaid.ed.gov/eligibility/non-us-citizens>.*
 - *The benchmarks reflect the Board's Strategic Plan, so the benchmark does not need to be adjusted.*
- Metric 8a (Graduate Degrees in Strategic Emphasis) (Includes STEM) - Modify the definition and benchmarks to reflect the inclusion of other degrees in Areas of Strategic Emphasis as approved by the Board of Governors November 2013.
 - *Adjustment: In November 2013, the Board approved a new list of strategic emphasis programs. This change aligns the PBF metric to the new categories for degrees awarded in Programs of Strategic Emphasis. The revised list includes: 113 disciplines within STEM, 46 disciplines within Health, 34 disciplines within Education, and 24 disciplines within Global Competitiveness.*
 - *The Board is considering changing the 2025 goal for this metric in the System Strategic Plan, so the benchmark does need to be adjusted.*

	1 pt	2 pts	3 pts	4 pts	5 pts
Previous	30%	35%	40%	45%	50%
Revised	40%	45%	50%	55%	60%

Overview of the University SUDS Submission Data & Process Flows



Data Flow by Owner





Office of the Provost
and Senior Vice President

235 Tigert Hall
PO Box 113175
Gainesville, FL 32611-3175
352-392-2404 Tel
352-392-8735 Fax

November 3, 2015

Audit Committee
University of Florida Board of Trustees
Room 217
903 W University Ave

Dear Audit Committee:

I am writing to acknowledge and accept the report *Performance Based Funding – Data Integrity* issued by the University of Florida Office of Internal Audit in response to a BOG requirement. I had the opportunity to meet and discuss the audit with Chief Audit Executive Brian Mikell on November 3, 2015.

I would like to thank him and his staff for their careful attention to this process.

Sincerely yours,

A handwritten signature in black ink, appearing to read "Joe Glover", written over a circular stamp that partially obscures the text "Joseph Glover".

Joseph Glover
Provost and Senior Vice President for Academic Affairs

JG/cdm



Office of the Provost
and Senior Vice President

235 Tigert Hall
PO Box 113175
Gainesville, FL 32611-3175
352-392-2404 Tel
352-392-8735 Fax

November 3, 2015

Audit Committee
University of Florida Board of Trustees
Room 217
903 W University Ave

Dear Audit Committee:

I am writing to acknowledge and accept the report *Performance Based Funding – Data Integrity* issued by the University of Florida Office of Internal Audit in response to a BOG requirement. I had the opportunity to meet and discuss the audit with Chief Audit Executive Brian Mikell on November 3, 2015.

I would like to thank him and his staff for their careful attention to this process.

Sincerely yours,

A handwritten signature in black ink, appearing to read "Joe Glover", written over a circular stamp that partially obscures the text "Joseph Glover".

Joseph Glover
Provost and Senior Vice President for Academic Affairs

JG/cdm