FLORIDA ATLANTIC UNIVERSITY
OFFICE OF INSPECTOR GENERAL

AUDIT OF PERFORMANCE BASED FUNDING DATA INTEGRITY FY2022

(Report No. FY22-A-01, Issued January 14, 2022)

Reuben Iyamu, MBA, CIA, CFE, CIGA
Inspector General

REPORT ON THE AUDIT OF
PERFORMANCE BASED FUNDING DATA INTEGRITY

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[2021 PBF Final Metric Score Sheet]

2021 Performance-Based Funding Model
Final Metric Score Sheet

Scores in black are based on Excellence. Scores in orange are based on Improvement.

Metric	FAMU	FAU	FGCU	FIU	FL Poly	FSU	NCF	UCF	UF	UNF	USF	UWF
1	8	9	9	9	10	8	0	8	10	9	9	10
2	7	10	9	10	10	10	10	10	10	10	10	10
3	10	10	10	10	10	10	10	10	10	10	10	10
4	10	10	10	10	0	10	10	8	10	8	10	3
5	10	3	3	10	10	10	2	10	10	3	9	3
6	8	10	10	10	10	7	10	10	10	10	10	10
7	10	9	7	10	8	6	6	8	5	7	9	8
8.a	3	10	10	10		9		10	10	6	10	10
8.b					10		5					
9.a	2	4	3	5	0	5	0	1	2	4	5	5
9.b	1	4	3	3		5	1	3	5	0	3	5
9.b.1					5							
10.a	10											
10.b		10										
10.c			8									
10.d				10								
10.l					10							
10.e						8						
10.f							10					
10.g								9				
10.h									5			
10.i										10		
10.j											9	
10.k												9
Total Score	79	89	82	97	83	88	64	87	87	77	94	83

2020 Score	73	85	88	88		85	87	89	90	83	94	82

Metrics 1 - 8b and 10a - 10l are out of 10 points. Metrics 9a, 9b and 9b1 are out of 5 points

Metric 1 - Percent of Bachelor's Graduates Employed and/or Continuing their Education Further 1 Yr after Graduation
Metric 2 - Median Average Wages of Undergraduates Employed 1 Yr after Graduation
Metric 3 - Net Tuition & Fees per 120 Credit Hours
Metric 4 - Four Year Graduation Rates (Full-time FTIC)
Metric 5 - Academic Progress Rate (2nd Year Retention with GPA above 2.0)
Metric 6 - Bachelor's Degrees Awarded in Areas of Strategic Emphasis (includes STEM)
Metric 7 - University Access Rate (Percent of Undergraduates with a Pell Grant)
Metric 8a - Graduate Degrees Awarded in Areas of Strategic Emphasis (includes STEM)
Metric 8b - Freshmen in Top 10% of Graduating High School Class
Metric 9a - Two-Year Graduation Rate for FCS Associate in Arts Transfer Student
Metric 9b - Six-Year Graduation Rate for Students who are Awarded a Pell Grant in their First Year
Metric 9b1 - Academic Progress Rate, 2nd Year Retention for FTIC with a Pell-Grant
Metric 10 - Board of Trustees' Choice (see detailed sheets)

M E M O R A N D U M

TO: FAU BOT Audit and Compliance Committee
Dr. John Kelly, President

FROM: Reuben Christian Iyamu, Inspector General

DATE: January 14, 2022

SUBJECT: **Performance Based Funding Data Integrity Audit, Report No. FY22-A-01**

In accordance with the University's Internal Audit Plan for fiscal year 2021-22, and at the request of the Florida Board of Governors (BOG), we have completed an audit of the University's processes and controls, which support data submitted to the BOG for its Performance Based Funding (PBF) metrics. This audit was part of a system-wide examination of data integrity based on data due to be submitted to the BOG as of November 30, 2021. The report contained herein presents our audit objectives, findings, and conclusions resulting from the procedures performed.

We determined, overall, that the University's processes and internal controls for data compilation and reporting to the BOG continues to provide reasonable assurance of the completeness, accuracy, and timeliness of the data submitted to the BOG. Also, we can provide a reasonable basis of support for the PBF Data Integrity Certification statement that is required to be signed by the University President and Board of Trustees (BOT) Chair by March 1, 2022. We identified one instance of late submission of data to the BOG, which was addressed by management prior to our audit. Accordingly, we have no recommendations that requires Management Action Plans (MAPs).

We would like to thank the staffs of the Offices of the Registrar, Student Financial Aid, and Institutional Effectiveness and Analysis (IEA) for their full cooperation and assistance during this audit.

Respectively Submitted,
Reuben C. Iyamu
Inspector General

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

OBJECTIVES, SCOPE, AND METHODOLOGY

The primary objectives of this audit were to:

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

- Provide a reasonable basis of support for the PBF Data Integrity Certification statement that is required to be signed by the University President and BOT Chair.

Our audit covered data submissions to the BOG through November 30, 2021. Detailed testing of data submitted to the BOG was restricted to information found in the *Degrees Awarded (SIFD)* file used for computations of Metrics 6, 8a, 9a, and 9b; the *Student Instruction File (SIF)*and *Retention (RET*) files used for calculations of Metrics 9a and 9b; and the *Student Financial Aid (SFA)* file used for calculation of Metric 9b. Elements located in data tables of these files were tested on a sample basis for validation with information primarily recorded in the Banner Student System and/or appropriate source documentation. Other relevant information reviewed for the audit included BOG narratives on PBF metric derivations, BOG data definitions, minutes of the University's Data Integrity Committee, and documentation related to controls over centralized and decentralized data validation, compilation, and submission protocols.

To achieve the stated audit objectives and scope, we conducted various audit procedures including, but not limited to, interviewing knowledgeable personnel; reviewing applicable governing rules, regulations, statutes, policies and procedures, prior audits conducted by our office or by other State University System of Florida (SUS) Universities; evaluating internal controls; and selecting and testing metrics and associated data elements.

We conducted this audit in accordance with the *International Standards for the Professional Practice of Internal Auditing (ISPPIA)* and with *Principles and Standards for Offices of Inspector General*.

BACKGROUND

The Florida BOG has broad governance responsibilities affecting administrative and budgetary matters for Florida's 12 public universities. In January 2014, the BOG approved a PBF model for the SUS based on ten metrics, the first eight of which were common to all institutions and the last two reflecting the choices of the BOG and each University's Board of Trustees respectively. Listed below are the 10 PBF metrics, which were applicable to Florida Atlantic University (FAU) for the 2021/22 scoring cycle:

1. **Percent of Bachelor's Graduates Enrolled or Employed (Earning at least $25,000 +)**
2. **Median Wages of Bachelor's Graduates Employed Full-time**
3. **Cost to the Student (Net Tuition & Fees for Resident Undergraduates per 120 Credit Hours)**
4. **Four Year FTIC (First-Time-in-College) Graduation Rate**
5. **Academic Progress Rate (Second Year Retention Rate 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)**

8a. Graduate Degrees within Programs of Strategic Emphasis

9a. Two-Year Graduation Rate for FCS Associate in Arts Transfer Student

9b. Six-Year Graduation Rate for Students who are Awarded a Pell Grant in their First Year

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

Controls over Data Validation, Compilation, and Submission

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

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

Each university that has been approved by the BOG as a Preeminent Research University (PRU), or an Emerging Preeminent Research University (EPRU), is required to conduct, and submit, an annual audit to the BOG Office of Inspector General (OIG) to verify that relevant data complies with the definitions and methodology for the 12 Preeminence metrics. FAU was not classified as one of these designations; therefore, a PRU or EPRU Data Integrity audit is not required.

FINDING AND RECOMMENDATION

Other than the one instance noted, of untimely submission of the Fall 2020 SIF (Student Instruction File) to the BOG, we found that the University's processes and internal controls for data compilation and reporting to the BOG continues to provide reasonable assurance of the completeness, accuracy, and timeliness of the data submitted to the BOG. Based on the results of our audit, we can provide a reasonable basis of support for the PBF Data Integrity Certification statement that is required to be signed by the University President and BOT Chair by March 1, 2022.

IEA had submitted the Fall 2020 SIF data file to BOG via SUDS on 1/23/21 rather than on the BOG's published due date of 1/15/21. In response to our inquiry, IEA Management (Management) indicated that the lateness was due to an inconsistency between data elements NATION_CITIZ (01110) and COUNTY_OF_RES (01055). The SIF build process handled this inconsistency well in the previous years, but in Fall 2020 due to COVID, data sources for address, application, and international student records had internal consistency issues beyond what the build process was able to handle. According to Management, the BOG Chief Data Officer and his team were informed the first business day after the submission deadline and FAU kept them updated on the progress. There was no delay in the PBF metric calculations.

Reporting Period	**Due Date**	**Per IEA – Date File Submitted**	**Number of Days Late**	**Primary Data Custodian**
Fall 2020	1/15/21	1/23/21	8	Registrar

We confirmed that Management had already addressed this issue with the BOG prior to our audit commencement. Accordingly, we have made no recommendation that requires a MAP. We commend Management for its continued efforts to ensuring timely submission of data to the BOG.

CONCLUSION

Based on our audit, we have concluded that the controls and processes which FAU has in place to ensure the accuracy and completeness of data submitted to the BOG in support of PBF are adequate.

We believe our audit can be relied upon by the University BOT and President, as a basis for certifying the representations made to the BOG, related to the integrity of data required for its PBF model.

Associate VP for IT & CIO:

We appreciate the thoroughness and professionalism exhibited throughout this audit process. We are pleased that the Inspector General found that overall, the University's processes and internal controls for data compilation and reporting provide reasonable assurance of the completeness, accuracy, and timeliness of the data. We are fully aware of the point that there was one late submission last year. As summarized in the audit report, this issue was immediately addressed. FAU adjusted the data preparation process with capacity to handle inconsistent source data caused by unforeseeable situations such as COVID. We would like to thank the Office of Inspector General for their time and effort on this audit.

This audit was conducted by:
Allaire Vroman, Internal Auditor/Investigator

Approved by:
Joseph Kuruc, CFE, CIA, Audit Services/Investigations Administrator
Reuben Iyamu, MBA, CIA, CFE, CIGA, Inspector General

LIST OF REPORT APPENDICES

Appendix

- METHODOLOGY FOR METRICS CALCULATIONS – *SIF, SIFD, RET & SFA* FILES A
  - Metrics #6 & 8a, *Percentage of Degrees Awarded in Programs of Strategic Emphasis*
  - Metrics #9a & 9b, *Retention and Graduation Rates (For FTIC's and FCS AA Transfer Cohorts)*

- DATA INTEGRITY CERTIFICATION STATEMENT REQUIRED BY BOG B

Performance Funding Metrics

Percentage of Degrees Awarded in Programs of Strategic Emphasis

(for Bachelor's and Graduate Degrees)

Overview of Methodology and Procedures

REVISED 04/28/2016

State University System of Florida
Board of Governors

The Board of Governors for the State University System of Florida approves a methodology document that is used to generate a list of Programs of Strategic Emphasis (PSE) to promote the alignment of the State University System degree program offerings with the economic development and workforce needs of the State. The Board has updated the methodology document several times to reflect that Florida's workforce needs change over time. The original methodology document and program list was created as part of a 2001 Advisory Group on Emerging Technologies. In 2005, the Board updated the methodology and list as part of the 2005-2013 System Strategic Plan, and it was again formally updated in 2009 as part of the 2012-2025 Strategic Plan effort. The last update occurred in November 2013 as part of the 2025 System Strategic Plan Re-Alignment initiative.

As with past iterations of the process, the 2009 update renamed the PSE categories to better demonstrate alignment with recommendations found in the key economic and workforce council reports and available data. The categories in the approved methodology document are used to generate a dynamic list of PSE from the State University System Academic Program Inventory database. The 2013 methodology document is designed such that some disciplines are included at the two digit CIP, others at the four digit CIP, and a few selected programs at the six digit CIP. New programs are captured in the dynamic PSE list as long as they fall under one of the Board approved CIP code categories.

For more information about the Programs of Strategic Emphasis please visit the Board's webpage at: http://www.flbog.edu/pressroom/strategic_emphasis/.

This document provides details on the methodology and procedures used by Board of Governors staff to calculate the Percentage of Degrees Awarded in Programs of Strategic Emphasis (for both bachelor's and graduate level) as reported in the 2025 System Strategic Plan, annual Accountability Reports, University Work Plans, and used in the Board's Performance Based Funding model.

1. Board Staff Analysis of State University Database System (SUDS) Data

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

- Degree Program Category [#1082]
- Degree Program Fraction of Degree Granted [#1083]
- Reporting Institution [#1045]
- Term Degree Granted [#1412]
- Degree Level Granted [#1081]
- Major Indicator [#2015]

a. Number of Degrees

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

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

b. Reporting Period

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

[1] The SUDS Data Dictionary has detailed definitions for the 21 elements included within the Degrees Awarded table and is available at: https://prod.flbog.net:4445/pls/apex/f?p=112:50:5018573689494::NO::P50_ROW_DISPLAY_COLUMNS:50.

2. Academic Program Inventory

In accordance with the requirements of Board of Governors regulation 8.011(4), the Board office maintains the official State University System Academic Degree Program Inventory, which identifies all the approved degree programs for each university within the System.[2] The programs are listed based on the Classification of Instructional Programs (CIP) taxonomy that the US Dept. of Education maintains. Universities may have multiple "majors" at the same degree level under one CIP code in accordance with definitions specified in regulation 8.011, and they may have degree programs at different levels within the same CIP. The degree program inventory is updated continuously, which allows for dynamic reports to be generated, such as the Programs of Strategic Emphasis List.

a. Newly Created Programs
Upon final approval, new degree programs are added into the degree program inventory with an effective term date for which enrollments and degrees can be reported. Programs that are terminated by the university also remain in the inventory database, but are noted as terminated with an effective term date after which no new enrollments can be reported. Enrollment data can still be reported for terminated programs until the programs 'teach out' any students who were enrolled at the time the program was terminated.

b. CIP Code Change
It is important to note that program curricula naturally evolve and change over time to keep up with the latest developments within their respective fields of study. Consequently, universities routinely submit requests to the Board office to change the CIP code assigned to an existing degree program in the Board's Academic Program Inventory. However, a CIP code change cannot have the net effect of adding a new degree program to the academic program inventory by changing the code for a major offered under a currently approved program. CIP Changes are different from program terminations because there is no 'teach out' phase for CIP changes.

Each CIP code change request indicates the future term in which the change will become effective. The effective term is important because any degrees awarded before the effective term are classified under the previous CIP code and degrees awarded after the CIP change are reported as the new CIP code.

c. Programs of Strategic Emphasis (PSE)[3]
The Board of Governors approves a methodology document that is used to generate a list of Programs of Strategic Emphasis (PSE) to promote the alignment of the State University System degree program offerings with the economic development and workforce needs of the State. The Board has updated the methodology document several times to reflect that Florida's workforce needs change over time. The original methodology document and program list was created as part of a 2001 Advisory Group on Emerging Technologies. In 2005, the Board updated the methodology and list as part of the 2005-2013 System Strategic Plan, and it was again formally updated in 2009 as part of the 2012-2025 Strategic Plan effort. The last update occurred in November 2013 as part of the 2025 System Strategic Plan Re-Alignment initiative.

As with past iterations of the process, the 2009 update renamed the PSE categories to better demonstrate alignment with recommendations found in the key economic and workforce council reports and available data. The categories in the approved methodology document are used to generate a dynamic list of PSE from the State University System Academic Program Inventory database. The 2013 methodology document is designed such that some disciplines are included at the two digit CIP, others at the four digit CIP, and a few selected programs at the six digit CIP.

[2] The Board's Academic Program Inventory is available at: https://prod.flbog.net:4445/pls/apex/f?p=136:13.
[3] For more information about the Programs of Strategic Emphasis please visit the Board's webpage at: http://www.flbog.edu/pressroom/strategic_emphasis/.

3. Using Outcomes

Accountability Reports

Board IR staff provide the Percentage of Bachelor's and Graduate Degrees Awarded within the Programs of Strategic Emphasis to each university Data Administrator for their review as well as a static snap-shot of the CIPs that are included in the Programs of Strategic Emphasis for the annual Accountability Reports. Any data discrepancies between university and Board calculations are resolved prior to the printing of the Accountability Report. The data reported in the Accountability Report is subsequently used in the University Work Plans and the Performance-Based Funding Model (PBF).

- The 2012-13 Accountability Report reported the Percentage of Strategic Emphasis Degrees Awarded based on the 2009 methodology of the Areas of Programmatic Strategic Emphasis – that expired at the end of summer 2014.
- The 2013-14 Accountability Report reported the Percentage of Strategic Emphasis Degrees Awarded based on the 2013 *methodology* of the Programs of Strategic Emphasis (PSE) – effective fall 2014.

University Work Plans

University Data Administrators use the Accountability Report data to develop the out-year data goals that are provided as part of the University's Work Plans.

- The June 2014-15 University Work Plans reported the Percentage of Strategic Emphasis Degrees Awarded based on the 2009 methodology of the Areas of Programmatic Strategic Emphasis – that expired at the end of summer 2014.
- The June 2015 University Work Plans reported the Percentage of Strategic Emphasis Degrees Awarded based on the 2013 *methodology* of the Programs of Strategic Emphasis (PSE) – effective fall 2014.

Performance Based Funding Model

In 2014, the Board approved a new Performance-Based Funding Model that included ten metrics – two of which were based on degrees awarded within Programs of Strategic Emphasis at the baccalaureate and graduate levels.

- In 2014, the first cycle of PBF used the Percentage of Bachelor's and Graduate Degrees Awarded within the Programs of Strategic Emphasis that was based on the 2009 *methodology* of the Areas of Programmatic Strategic Emphasis – that expired at the end of summer 2014.
- In 2015, the second cycle of PBF used the Percentage of Bachelor's and Graduate Degrees Awarded within the Programs of Strategic Emphasis that was based on the 2013 *methodology* of the Programs of Strategic Emphasis (PSE) – effective fall 2014.

Performance Funding Metrics

Methodology and Procedures

Retention and Graduation Rates

For FTICs and FCS AA Transfer Cohorts

REVISED 09/01/2020

State University System of Florida
Board of Governors

Background

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

In 2011, the Board of Governors included retention and graduation rate metrics in its 2012-2025 System Strategic Plan.

In 2014, the importance of the retention and graduation rate data was further elevated by their inclusion of the following two metrics in a new Performance-Based Funding (PBF) Model:

- Six-Year Graduation Rate for First-time-in-College (FTIC) Students
- Second Fall Retention Rate for Full-time, FTIC with At Least a 2.0 GPA

In 2018, the Florida Legislature changed the FTIC graduation rate metric included in PBF from a six-year to a four-year measure.

- Four-Year Graduation Rate for Full-time, First-time-in-College (FT-FTIC) Students

The 2019 Florida Legislature added the following two new graduation rate metrics to the PBF model:

- Two-year Graduation Rates for Florida College System AA Transfers
- Six-Year Graduation Rate for First-time-in-College (FTIC) Students with a Pell Grant

This document provides details on the methodology and procedures used by Board of Governors staff during the analysis and production of the four PBF metrics related to retention and graduation rates that are reported in the annual Accountability Plans.

1. Overview of Data Sources & Procedure

The State University System of Florida Board of Governors maintains a student unit record database titled the State University Database System (SUDS). Retention and graduation rate data are finalized using the Retention submission, which differs from other submissions as the Board's Office of Data & Analytics (ODA) staff builds the initial Retention data using previously accepted Student Instruction File (SIF) and the Degrees Awarded (SIFD) data.

Retention Submission Process

1	ODA staff build the initial Retention datasets for each institution.
2	Institutional Data Administrators (IDAs) review ODA's initial Retention build and make cohort adjustments, make ID changes, and report late degrees that haven't previously been reported on the SIFD. After the IDAs have made these adjustments, they then officially submit the Retention submission. **Important note: these changes only apply to the Retention submission and are not incorporated into the underlying SIF or SIFD tables. So, any student type or ID changes or late degrees reported on the Retention submission is not added to the related SIF or SIFD tables.**
3	SUDS software executes scripts that require two overnight processes to update person ID data and run the SQL and SAS reports. Once IDs and reports have been updated, sometimes the IDAs need to make additional cohort adjustments and resubmit the Retention submission again.
4	ODA staff review and approve the Retention submissions.
5	ODA staff provide preliminary retention and graduation rates to the IDAs for their review and approval prior to the data being shared with, and approved by, each university Board of Trustees and the Board of Governors as part of the annual Accountability Plan process.

2. Defining the Cohort

A cohort is composed of students who were all admitted to the university during the same year. The number of students who are assigned to a cohort serves as the denominator in the calculation of retention and graduation rates. Institutional Data Administrators classify students based on the following components which ODA staff use to determine student cohorts:

A. Student Level:

Only the students who meet the following criteria are included in the cohort.

- STUDENT CLASS LEVEL [#1060] is either L (lower division undergraduate) or U (upper division undergraduate).
- DEGREE HIGHEST HELD [#1112] must be less than a Bachelor's.
- FEE CLASSIFICATION KIND [#1107] must equal 'G' (general instruction).

B. Cohort Year:

A retention cohort year is defined as the summer, fall, and spring terms when DATE MOST RECENT ADMISSION [#1420] equals REPORTING TIME FRAME [#2001].

COHORTS	RECENT ADMIT DATE		
	SUMMER	FALL	SPRING
2017-18	201705	201708	201801
2018-19	201805	201808	201901
2019-20	201905	201908	202001

C. Cohort Types:

The COHORT TYPE [#1429] is a derived element that is built by ODA staff and is based on the TYPE OF STUDENT AT TIME OF MOST RECENT ADMISSION [#1413] as reported by institutions in the SIF submissions.

- First-Time in College Students include two types of students:
  - Students who are admitted into a university for the first time and who have earned less than 12 credit hours after high school graduation [#1413= 'B'].
  - Students who are considered 'Early Admits' because they have been officially admitted and are seeking a degree at the university prior to their high school graduation [#1413= 'E'].
- Transfer Students from the Florida College System with an Associate in Arts degree are based on the following criteria:
  - TYPE OF STUDENT AT TIME OF MOST RECENT ADMISSION [#1413] is Florida College System ['J'].
  - HIGHEST DEGREE HELD [#1112] during their first term enrolled as a Florida College System transfer [#1413='J'] is an Associate's degree ['A'].
  - INSTITUTION GRANTING HIGHEST DEGREE [#1411] during their first term enrolled as a Florida College System transfer [#1413='J'] is a Florida College System institution.
- Note: A small number (less than 0.001) of students are found in both the FTIC and FCS AA Transfer cohorts in different cohort years.

D. Student Right to Know Flag:

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

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

E. Full-Time / Part-Time Indicator:

The FULL-TIME / PART-TIME INDICATOR [#1433] is an indicator based on the number of credit hours attempted (not earned) during their first fall term. A student entering in the fall and taking 12 or more credit hours will remain in the full-time category regardless of the number of credits taken in subsequent terms.

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

F. Cohort Adjustments:

Institutional Data Administrators use the Cohort Adjustment Flag [#1442] on the Retention Cohort Changes (RETC) table to make cohort adjustments. The US Department of Education allow institutions to exclude students from cohorts for a few select reasons – these are known as 'IPEDS exclusions'. In addition, ODA staff allow Institutional Data Administrators to make other cohort adjustments to reflect better information that has become available since the underlying data was first reported to SUDS. The ten types of cohort adjustments that are used to calculate PBF metrics are shown in the table below.

Historically, these adjustments were only made for students in the upcoming six-year cohort, but with the new focus on four-year graduation, several institutions have started identifying cohort adjustments for multiple cohorts in a single retention submission. It is important to know that the Retention software does not enable an IDA to re-insert a student who was previously excluded from a cohort. This is especially important for the students who have been identified as having been officially admitted to an Advanced Graduate program (classified as 'P' or 'T') without earning a bachelor's degree. Since these students will not earn a bachelor's degree, they can be removed from the FTIC cohort for the calculation of graduation rates. Because the cohort adjustment cannot be undone, it is important to stress that this adjustment cannot be used for students who are just *seeking* an Advanced Graduate degree – only students who have been formally admitted to the program and will not be earning a bachelor's degree can have this designation. The SUDS database does not yet collect which students are enrolled in an Advanced Graduate program, so ODA does not know who should be removed from the cohort for this reason. The students who are identified as being in these advanced graduate programs should be carefully reviewed by university audit staff.

- It is also important to note that these Advanced Graduate students will not be removed from the Academic Progress Rate or Retention Rate calculations, as there is no reason why entry into an accelerated graduate program would prohibit enrollment during the second fall term. Therefore, ODA cautions that universities should not apply the Advanced Graduate ('P' or 'T') adjustment to any student in their first year (when COHORT YEAR equals REPT_TIMEFRAME).
- Information Adjusted by Correction (I) is used to adjust a student's information (e.g., cohort type, SRK flag, or full/part-time indicator) which potentially moves a student from one cohort to another, but this adjustment does not remove/exclude the student from all cohorts.

COHORT ADJUSTMENTS USED IN PBF METRICS

CATEGORIES	RETENTION & APR	GRAD RATES
Death (A)*	Removed	Removed
Totally/Permanently Disabled (D)*	Removed	Removed
Left to Serve in Armed Forces (F)*	Removed	Removed
Left to serve in the Federal Foreign Aid Service (G)*	Removed	Removed
Left to serve an Official Church Mission (M)*	Removed	Removed
Registered but never attended (B)	Removed	Removed
Multiple Cohorts (Q)	Removed	Removed
Pharmacy doctoral program (P)	Not used	Removed
Advanced Graduate Program (T)	Not used	Removed
Information Adjusted by Correction (I)	Adjustment	Adjustment

Note: The IPEDS exclusions are identified with an asterisk (*). There are other values included in the Cohort Adjustment Flag [#1442] that are not listed here because they are not included in the PBF methodology.

3. Calculating the Number Retained or Graduated

A. Academic Progress Rates (Second Fall Retention Rates)

- Cohorts: The number of students in the cohort serves as the denominator for the retention rate, and is based on the following rules:
  - Cohort Type= 'FTIC'; Student Right to Know (SRK)= 'Yes'; FT/PT Indicator= 'Full-time'.
  - Cohort Adjustments – excludes: Death (A), Registered but never attended (B), Totally/Permanently Disabled (D), Serve in Armed Forces (F), Federal Foreign Aid Service (eg, Peace Corps) (G), Official Church Mission (M), Multiple Cohorts (Q).
    - Note: Effective with the 2020 Accountability Plans, ODA decided not to revise historical retention (PBF and KPI) cohort counts based on subsequent cohort adjustments. The rationale for this recognizes that actions in subsequent years should not impact the fact that a student was retained into their second fall term. This decision means that the SQL reports in the Retention submission will remain the official record for retention rates.
  - The Retention Rate reported in the annual Accountability Plans is different from what is reported to the U.S. Department of Education's Integrated Postsecondary Education Data System (IPEDS). The primary difference is due to timing – the retention rate that is reported to IPEDS is based on preliminary, beginning-of-term (SIFP) enrollment data; whereas the retention rate in the annual Accountability Plan is based on final, end-of-term (SIF) enrollment data.

- Retained or Graduated: The numerator for the standard retention rate includes two components: (1) the number of students in the cohort who are still enrolled during the second fall term, and (2) those students who graduated in their first year - prior to the start of the second fall term.

- Grade Point Average: The Academic Progress Rate PBF metric includes the student's cumulative 'institution GPA' at the beginning of the second year (BEG_YR2). This excludes GPA points from postsecondary transfer credits. Only students with a BEG_YR2 GPA of at least 2.0 are included in the numerator. This GPA threshold aligns with a criterion for Satisfactory Academic Progress that is a standard eligibility threshold for financial aid eligibility. The addition of the GPA criterion makes this metric a more powerful leading indicator for a timely graduation.
  - Effective with the 2019 Accountability Plan[1], ODA calculates each student's first-year college GPA based on the data provided in the enrollment table of the Fall term SIF submissions during the student's second Fall term. This GPA calculation for each student is included in the SQL report in the Retention submission. The formula used for calculating GPA is provided below:

    BEGINNING-OF-YEAR2 (BEG_YR2) METHODOLOGY

    GPA_INST_GRADE_PTS [#1086]
    ---------- divided by ----------
    GPA_INST_HRS [#1085]

[1] Historically, the end of the first year cumulative GPA was based on data that was submitted prior to the second fall term. This process was complicated by timing issues due in large part to the fact that many grades were still incomplete during the summer term before the second fall term (usually due in mid-September). In order to create a smoother procedural flow, and fix timing issues caused by incomplete grades, the Board's Office of Data & Analytics worked with the Council of Data Administrators to revise the methodology to instead use the beginning of term data as reported in the second fall enrollment table (due late January).

B. Four Year FTIC Graduation Rates

- Cohorts: The number of students in the cohort serves as the denominator for the graduation rate. The denominator used in the calculation of the four-year FTIC graduation rate is based on the following:
  - Cohort Type= 'FTIC' ('B' and 'E').
  - SRK= 'Yes' – includes fall entrants and summer-to-fall entrants.
  - FT/PT Indicator= 'Full-time' only – based on attempted hours in the first fall term.
  - Cohort Adjustments – excludes: Death (A), Registered but never attended (B), Totally/Permanently Disabled (D), Serve in Armed Forces (F), Federal Foreign Aid Service (eg, Peace Corps) (G), Official Church Mission (M), Multiple Cohorts (Q), Pharmacy doctoral program (P), Advanced Graduate Program (T).
- Graduated: The number of students in the cohort who graduated within four years (by the fourth summer term after entry) from the same institution serves as the numerator for the graduation rate.

- Late degrees and Historic Grad Rates. It is important to note that degrees included in the graduation rate calculation can differ from those included in the calculation for degrees awarded because the calculation for graduation rates can include more terms than the degrees awarded calculation. Degrees can be reported to SUDS after the degree was awarded – these are called 'late' degrees and 'late-late' degrees. The table below shows the difference in which terms are included when reporting academic year degree counts and graduation rates. DEG_TERM (rows) indicates when the degree was awarded to the student and REPT_TIME_FRAME (columns) indicates when the institution reported that degree to the Board office.
  - The red box shows which terms are used to report degrees awarded during the 2019-20 academic year. It includes three DEG_TERMS (summer, fall, and spring) that spans four REPT_TIME_FRAME terms to allow for 'late' and a few select 'late-late' degrees.
  - Alternatively, the yellow highlighted cells shows which terms are used to initially report the 2016-20 FTIC graduation rates. As you can see, the calculation for graduation rates includes many more terms than the degrees awarded calculation. This is because the methodology for calculating graduation rates does not include REPT_TIME_FRAME and only considers DEG_TERM. As a result, each year historical graduation rates can change as newly reported 'late-late' degrees are included. The green highlighted cells shows the additional REPT_TIME_FRAME terms that will be included the subsequent year when the 2016-20 graduation rates are recalculated. These 'late-late' degrees are not a large number but can potentially change rates that are reported into the decimals.
    - It is important to note that late degrees that haven't already been submitted on the SIFD must be submitted on the Retention submission to be included in the graduation rates.

DEG_TERM	REPT_TIME_FRAME															
	201605	201608	201701	201705	201708	201801	201805	201808	201901	201905	201908	201901	202005	202008	202001	202105
201605	ON TIME	LATE	LATE LATE	LATE LATE	LATE LATE	LATE LATE	LATE LATE	LATE LATE	LATE LATE	LATE LATE	LATE LATE	LATE LATE	LATE LATE	LATE LATE	LATE LATE	LATE LATE
201608	.	ON TIME	LATE	LATE LATE	LATE LATE	LATE LATE	LATE LATE	LATE LATE	LATE LATE	LATE LATE	LATE LATE	LATE LATE	LATE LATE	LATE LATE	LATE LATE	LATE LATE
201701	.	.	ON TIME	LATE	LATE LATE	LATE LATE	LATE LATE	LATE LATE	LATE LATE	LATE LATE	LATE LATE	LATE LATE	LATE LATE	LATE LATE	LATE LATE	LATE LATE
201705	.	.	.	ON TIME	LATE	LATE LATE	LATE LATE	LATE LATE	LATE LATE	LATE LATE	LATE LATE	LATE LATE	LATE LATE	LATE LATE	LATE LATE	LATE LATE
201708	.	.	.	.	ON TIME	LATE	LATE LATE	LATE LATE	LATE LATE	LATE LATE	LATE LATE	LATE LATE	LATE LATE	LATE LATE	LATE LATE	LATE LATE
201801	.	.	.	.	.	ON TIME	LATE	LATE LATE	LATE LATE	LATE LATE	LATE LATE	LATE LATE	LATE LATE	LATE LATE	LATE LATE	LATE LATE
201805	.	.	.	.	.	.	ON TIME	LATE	LATE LATE	LATE LATE	LATE LATE	LATE LATE	LATE LATE	LATE LATE	LATE LATE	LATE LATE
201808	.	.	.	.	.	.	.	ON TIME	LATE	LATE LATE	LATE LATE	LATE LATE	LATE LATE	LATE LATE	LATE LATE	LATE LATE
201901	.	.	.	.	.	.	.	.	ON TIME	LATE	LATE LATE	LATE LATE	LATE LATE	LATE LATE	LATE LATE	LATE LATE
201905	.	.	.	.	.	.	.	.	.	ON TIME	LATE	LATE LATE	LATE LATE	LATE LATE	LATE LATE	LATE LATE
201908	.	.	.	.	.	.	.	.	.	.	ON TIME	LATE	LATE LATE	LATE LATE	LATE LATE	LATE LATE
202001	.	.	.	.	.	.	.	.	.	.	.	ON TIME	LATE	LATE LATE	LATE LATE	LATE LATE
202005	.	.	.	.	.	.	.	.	.	.	.	.	ON TIME	LATE	LATE LATE	LATE LATE
202008	.	.	.	.	.	.	.	.	.	.	.	.	.	ON TIME	LATE	LATE LATE
202101	.	.	.	.	.	.	.	.	.	.	.	.	.	.	ON TIME	LATE
202105	.	.	.	.	.	.	.	.	.	.	.	.	.	.	.	ON TIME

C. Two Year FCS-AA Transfer Graduation Rates

- Cohorts: The number of students in the cohort serves as the denominator for the graduation rate. The cohort used in the calculation of the two-year FCS AA Transfer graduation rate is based on the following:
  - Cohort Type= 'A' (Florida College System Transfer with an AA Degree),
  - FT/PT Indicator= 'Full-time' only – based on attempted hours in the first fall term,
  - SRK= 'Yes' – includes fall entrants and summer-to-fall entrants,
  - Cohort Adjustments – excludes: Death (A), Registered but never attended (B), Totally/Permanently Disabled (D), Serve in Armed Forces (F), Federal Foreign Aid Service (eg, Peace Corps) (G), Official Church Mission (M), Multiple Cohorts (Q), Pharmacy doctoral program (P), Advanced Graduate Program (T).

- Graduated: The number of students in the cohort who graduated within two years (by the second summer term after entry) from the same institution serves as the numerator for the graduation rate.

D. Six Year FTIC Pell Graduation Rates

- Cohorts: The number of students in the cohort serves as the denominator for the graduation rate. The cohort for the six-year FTIC Pell graduation rate is based on the following:
  - Cohort Type= 'FTIC' ('B' and 'E'),
  - Pell_FY='Yes' – flags students who received a Pell grant anytime during their first year (summer, fall, spring terms). The ODA Retention build uses AWARD PAYMENT TERM (#02040) data from the SFA submissions to derive this field. For example, the 20182019 cohort will use AWARD PAYMENT TERM between 201805 and 201901 terms.
  - SRK= 'Yes' – includes fall entrants and summer-to-fall entrants,
  - Cohort Adjustments – excludes: Death (A), Registered but never attended (B), Totally/Permanently Disabled (D), Serve in Armed Forces (F), Federal Foreign Aid Service (eg, Peace Corps) (G), Official Church Mission (M), Multiple Cohorts (Q), Pharmacy doctoral program (P), Advanced Graduate Program (T).
  - FT/PT Indicator is <u>not</u> used for this metric, so both Full- and Part-time students are included.

- Graduated: The number of students in the cohort who graduated within six years (by the sixth summer term after entry) from the same institution serves as the numerator for the graduation rate.

Data Integrity Certification
March 2022

University Name: Florida Atlantic 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 **material or significant** audit findings.

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 and Preeminence or Emerging-preeminence Status.	☐	☐	
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 provided 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.	☐	☐	

Data Integrity Certification

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, and data definitions 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 Board of Governors' and statutory requirements for the use of data related to the Performance-based Funding initiative and Preeminence or Emerging-preeminence status consideration will drive university policy on a wide range of university operations – from admissions through graduation. I certify that university policy changes and decisions impacting data used for these purposes 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 the related metrics.	☐	☐	

Data Integrity Certification

Data Integrity Certification Representations			
Representations	**Yes**	**No**	**Comment / Reference**
12. I certify that I agreed to the scope of work for the Performance-based Funding Data Integrity Audit and the Preeminence or Emerging-preeminence Data Integrity Audit (if applicable) conducted by my chief audit executive.	☐	☐	
13. In accordance with section 1001.706, Florida Statutes, I certify that the audit conducted verified that the data submitted pursuant to sections 1001.7065 and 1001.92, Florida Statutes [regarding Preeminence and Performance-based Funding, respectively], complies with the data definitions established by the Board of Governors.	☐	☐	

Data Integrity Certification Representations, Signatures

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

Certification:_____Date_____
President

I certify that this Board of Governors Data Integrity Certification for Performance-based Funding and Preeminence or Emerging-preeminence status (if applicable) has been approved by the university board of trustees and is true and correct to the best of my knowledge.

Certification:_____Date_____
Board of Trustees Chair

Data Integrity Certification
March 2022

University Name: Florida Atlantic 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 **material or significant** audit findings.

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 and Preeminence or Emerging-preeminence Status.	☑	☐	
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 provided accurate data to the Board of Governors Office.	☑	☐	
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Data Integrity Certification

Data Integrity Certification Representations			
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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 Board of Governors' and statutory requirements for the use of data related to the Performance-based Funding initiative and Preeminence or Emerging-preeminence status consideration will drive university policy on a wide range of university operations – from admissions through graduation. I certify that university policy changes and decisions impacting data used for these purposes 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 the related metrics.	☑	☐	

Data Integrity Certification

Data Integrity Certification Representations			
Representations	**Yes**	**No**	**Comment / Reference**
12. I certify that I agreed to the scope of work for the Performance-based Funding Data Integrity Audit and the Preeminence or Emerging-preeminence Data Integrity Audit (if applicable) conducted by my chief audit executive.	☑	☐	
13. In accordance with section 1001.706, Florida Statutes, I certify that the audit conducted verified that the data submitted pursuant to sections 1001.7065 and 1001.92, Florida Statutes [~~regarding Preeminence and~~ Performance-based Funding, respectively], complies with the data definitions established by the Board of Governors.	☑	☐	

Data Integrity Certification Representations, Signatures

I certify that all information provided as part of the Board of Governors Data Integrity Certification for Performance-based Funding and Preeminence or Emerging-preeminence status (if applicable) 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 2/1/21
President

I certify that this Board of Governors Data Integrity Certification for Performance-based Funding and Preeminence or Emerging-preeminence status (if applicable) has been approved by the university board of trustees and is true and correct to the best of my knowledge.

Certification: _____ Date 02/01/2021
Board of Trustees Chair