



Date: February 21, 2022
To: New College of Florida Board of Trustees
President Okker
From: Alexander G. Tzoumas, Chief Audit Executive / Chief Compliance Officer
Subject: Summary of the Performance Based Funding Data Integrity Audit

In accordance with the June 14, 2021 correspondence received from Board of Governors' Chairman Sydney Kitson, the New College of Florida must perform an annual Data Integrity Audit. The integrity of data provided to the Board of Governors by each State University System institution is critical to the performance-based funding decision-making process. The objective of the independent audit is to:

- 1) Confirm whether the process controls established by the College ensure the completeness, accuracy, and timeliness of data submissions to the Board of Governors that support performance funding metrics; and,
- 2) Provide an objective basis of support for the College's President and Board of Trustees' Chairman to sign the representations made in the Performance Based Funding – Data Integrity Certification.

While the directive from Board of Governors' Chairman requires the performance of an annual audit, each respective university's Board of Trustees and Chief Audit Executive may set the audit scope and objectives. Since the previous audits found no material data reporting findings, the Chief Audit Executive, in coordination with the Chairman of the Board of Trustees' Audit and Compliance Committee, Chief Financial Officer, and Board of Governor's Inspector General's Office, determined the objectives of the audit should remain the same as prior years but the scope could be modified such that all ten metrics would be audited every three years on a rotational basis. The scope of the 20-21 audit is detailed in the attached report prepared by Mauldin & Jenkins. Mauldin & Jenkins has performed the independent Performance Based Funding audit for the last five years.

Audit Finding and Management Response

Finding

There was one finding identified in the audit as follows:

We identified seven (7) students who did not have the proper Student Class Level value in Banner. These students had a value of "U" (Upper Division Undergraduate) instead of an "L" (Lower Division Undergraduate).

Management Response

Management provided the following explanation for the cause of the finding and the remediation efforts being made.

In October 2020, our Information Technology programmer inadvertently changed the reporting program of this data element in the Board of Governor (BOG) Student Instruction File (SIF) files, while modifying the reporting program to account for the Registrar's substantial change to the College's transfer credit policy. The change resulted in misclassifying some undergraduate students from "L" (Lower Division Undergraduate) to "U" (Upper Division Undergraduate). The change did not impact the New College of Florida performance funding reporting numbers. Our Information Technology office has corrected the reporting program since then and we will complete the resubmission of the BOG Student

Instruction File (SIF) files for Fall 2020 and Spring 2021 by the end of February, 2022.

Previous Audit Finding

Last year's 19-20 Performance Based Funding Data Integrity Audit did not note any findings. The 18-19 Audit noted a finding regarding the enrollment process of a Career Seminar and the effect on the calculation of Metric 1. The finding did not impact previous years funding disbursements and the Board of Governors was informed before funds were distributed for that year. The Board of Governors has since revised the calculation of Metric 1 by excluding post graduate enrollment in any SUS courses. The result is that the Career Seminar will no longer be included in the calculation of Metric 1.

Conclusion

Based upon the work performed by Mauldin & Jenkins and the internal process controls confirmed to be in place and operating effectively, I have concluded the processes and procedures used to report the Performance Based Funding Data are functioning in a reliable manner to ensure in all material respects the completeness, accuracy, and timeliness of data submissions and meet Board of Governors' certification objectives.

Enc: Performance Based Data Integrity Agreed-Upon Procedures Audit dated September 30, 2020 with scope attachment
Performance Based Funding Data Integrity Certification Form
Management's Representation Letter to Mauldin & Jenkins

**NEW COLLEGE OF FLORIDA
INDEPENDENT ACCOUNTANT'S REPORT ON APPLYING
AGREED-UPON PROCEDURES**

SEPTEMBER 30, 2021

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INDEPENDENT ACCOUNTANT’S REPORT ON APPLYING
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SEPTEMBER 30, 2021

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INDEPENDENT ACCOUNTANT'S REPORT ON APPLYING AGREED-UPON PROCEDURES

Board of Trustees
New College of Florida
Sarasota, Florida 34243

We have performed the procedures enumerated below, which were agreed to by the Board of Trustees of New College of Florida (the "College"), solely to assist the College in determining whether the College has processes established to ensure the completeness, accuracy and timeliness of data submissions to the Board of Governors (the "BOG") which support the Performance Funding Metrics of the College as of September 30, 2021. The College is responsible for all processes and procedures related to the complete, accurate and timely submission of data to the BOG. The sufficiency of these procedures is solely the responsibility of the parties specified in this report. Consequently, we make no representation regarding the sufficiency of the procedures described below either for the purpose for which this report has been requested or for any other purpose.

Our procedures and findings were as follows:

We reviewed the BOG submissions relating to the Performance Funding Metrics identified and published by the State University System of Florida (the "SUS") specific to the certification. See Attachment I for a listing of the submissions management selected for testing in the current year.

- a) *Review the processes used by the Data Administrator to ensure the completeness, accuracy and timely submission of data to the Board of Governors.*
1. Interview the Director of Institutional Research and Assessment and other key data managers to understand the internal processes in place to gather, test and ensure that only valid data, as defined by the BOG, is timely submitted to the BOG.
 2. Identify and evaluate key processes over data input and submission. Consider evaluating the processes from the point of incoming information to the submission of the data file to the BOG.
 3. Review internal records such as time management schedules and relevant correspondence which purport to demonstrate that complete and accurate data is timely submitted to the BOG (See due dates addressed in the SUS data workshop).
 4. According to BOG Regulation 3.007, prior to submitting the file, the universities shall ensure the file is consistent with the criteria established in the specifications document by performing tests on the file using applications/processes provided by the BOG Information Resource Management (IRM) office. Review process for timely and accurately addressing data file error reports.
 5. Evaluate the results and document your conclusion on the Data Administrator's processes.

Procedures Performed

- Interviewed the following people who have significant responsibility for the data being reported and submitted to the BOG:
 - Director of Institutional Research and Assessment, Office of Institutional Research and Assessment;
 - Director of Administrative Computing, Office of Information Technology;
 - Controller, Business Office;
 - Registrar, Office of the Registrar;
 - Associate Dean of Enrollment Services and Director of Admissions, Office of Admissions and Financial Aid;
 - Director of Financial Aid, Office of Admissions and Financial Aid.
- For those interviewed, we discussed key internal controls and processes in place over data input, Banner access, SLATE (the Admission Department's recruitment software) access (when applicable), State University Database System (SUDS) access, validation tables, data submission procedures, error resolution, staff training, and other controls specific to the department and submission of accurate and timely data. Reviewed the metrics specific to each department to ensure controls are in place and a clear understanding exists to ensure only valid data is being submitted based on the data definitions.
- Reviewed submission schedule maintained by the IRA department.
- Verified submission files tested were submitted by the due date as published by the State University System of Florida (SUS) and identified on the SUDS website.
- Tested the submission file criteria definitions used by the College to ensure they meet the data definitions published by the SUS.
- Reviewed processes over testing and validating data submissions and procedures for the resolution of errors prior to the final submission.

Findings

No exceptions were identified as a result of applying these procedures.

b) Testing of data accuracy.

1. Identify and evaluate data validity controls to ensure that data extracted from the primary systems of record are accurate and complete. This may include review of controls over code used to create the data submission. Review each measure's definition and calculation for the consistency of data submissions with the data definitions and guidance provided by the BOG.
2. As appropriate, select samples from data the College has submitted to the BOG for its Performance Funding Model. Vouch selected data to original source documents (this will most likely include the College's student and financial systems used to capture relevant information).
3. Evaluate the results of the testing and conclude on the completeness and accuracy of the submissions examined.

Procedures Performed

- For each metric and submission file identified, listed in Attachment I, we performed the following procedures for the specific metrics identified in the Performance Funding Metrics published by the SUS:
 - Obtained complete submission file for time period being tested;
 - Selected a sample size of thirty (30) data items to test for each file submission and each metric specific to the performance funding testing;
 - Verified data reported in the submission files specific to the metrics identified by the SUS agreed to the source system Banner;
 - Verified the data reported for each metric agreed with the SUDS data dictionary.
- To determine the completeness of the files being submitted, we performed the following procedures:
 - For each term and reported time frame, we obtained a file which was extracted from Banner and compared to submission files extracted by the Institutional Research and Analysis department. For each comparison we identified any person that was on the Banner report that was not in the file submission. We then selected a sample size based on the size of the file and errors returned and verified the student was properly omitted for the specific submission based on the current data definitions. Selected files and corresponding sample sizes are as follows:
 1. All students enrolled were compared to the Student Instruction Files (SIF) submitted. No differences were identified.
 2. All students who received Pell grants were compared to the Student Financial Aid (SFA) files submitted. No differences were identified.
 3. All students who had a degree awarded were compared to the Degrees Awarded (SIFD) files submitted. No differences were identified.

Findings

We identified seven (7) students who did not have the proper Student Class Level value in Banner. These students had a value of “U” (Upper Division Undergraduate”) instead of an “L” (Lower Division Undergraduate).

- c) Evaluate the veracity of the College Data Administrator’s data submission statements that indicate, “I certify that this file/data represents the position of this College for the term being reported.”
1. Interview the College Data Administrator to consider the reasonableness of the various coordination efforts with the Data Administrator’s staff, the other Data Custodians’ staff, BOG IRM, and other knowledgeable individuals which form the basis for personal and professional satisfaction that data submitted to the BOG is complete, accurate and submitted timely.
 2. Inquire how the Data Administrator knows the key controls are in place and operating effectively. If not already done, consider verifying these key controls are in place and adequate to support the Data Administrator’s assertions.

Procedures Performed

- Interviewed personnel listed in section a. and verified communication with the Institutional Research and Assessment department is on-going and clear to ensure accurate and timely data submission. Also, verified the Data Administrator understands the key controls specific to the metrics being tested and that they are functioning. This was performed through review of emails, various correspondence between departments, and discussions with each personnel.
- Verified with the Director of Institutional Research and Assessment her communication with the BOG and IRM to ensure data being submitted meets the data definitions. This was performed through review of correspondence and emails.

Findings

No exceptions were identified as a result of applying these procedures.

We were engaged by New College of Florida to perform this agreed-upon procedures engagement and conducted our engagement in accordance with attestations standards established by the American Institute of Certified Public Accountants. We were not engaged to and did not conduct an examination or review engagement, the objective of which would be the expression of an opinion or conclusion, respectively, on the processes and procedures for the complete, accurate and timely submission of data to the BOG. Additionally, the specific accuracy of the current year data submissions was not a part of our review. Accordingly, we do not express such an opinion or conclusion. Had we performed additional procedures, other matters might have come to our attention that would have been reported to you.

We are required to be independent of the College and to meet our other ethical responsibilities, in accordance with the relevant ethical requirements relating to this engagement.

This report is intended solely for the information and use of New College of Florida's Board of Trustees and management and is not intended to be and should not be used by anyone other than these specified parties.

Bradenton, Florida
February 17, 2022

Mauldin & Jenkins, LLC

**NEW COLLEGE OF FLORIDA
METRIC RELATED SUBMISSIONS
OCTOBER 1, 2020 THROUGH SEPTEMBER 30, 2021**

ATTACHMENT I

| Performance Based Funding Metrics Tested | |
|---|--|
| 1 | Percent of Bachelor's Graduates Enrolled or Employed (\$25,000+) |
| 2 | Median Wages of Bachelor's Graduates Employed Full-time |
| 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 |

For the above metrics, the data elements specific to those metrics were tested in the below submission files.

| Submissions Tested | | | | |
|---------------------------|-------------------------------------|---------------------|------------------------|----------------------|
| Due Date | Submission | Term or Year | Rept Time Frame | Sample Tested |
| 10/12/2020 | ADM - Admissions File | Fall 2020 | 202008 | 30 |
| 10/16/2020 | SFA - Student Financial Aid File | Annual 2019 | 20192020 | 30 |
| 1/22/2021 | SIF - Student Instruction File | Fall 2020 | 202008 | 30 |
| 1/29/2021 | RET - Retention File ⁽¹⁾ | Annual 2019 | 20192020 | 0 |
| 3/1/2021 | ADM - Admissions File | Spring 2021 | 202101 | 30 |
| 6/16/2021 | SIF - Student Instruction File | Spring 2021 | 202101 | 30 |
| 6/30/2021 | SIFD - Degrees Awarded | Spring 2021 | 202101 | 30 |

⁽¹⁾ No changes to prior BOG data files were reported and submitted to the BOG during the period.



Office of the President

February 17, 2022

Mauldin & Jenkins, LLC
1401 Manatee Avenue West, Suite 1200
Bradenton, Florida 34205

In connection with your engagement to apply agreed-upon procedures in relation as to the submissions to the Board of Governors (BOG) which support the Performance Funding Metrics of the University as of September 30, 2021, we confirm, to the best of our knowledge and belief, the following representations made to you during your engagement.

- 1) We are responsible for the submissions of the Performance Funding Metrics of the University in accordance with the Board of Governors due dates and data definitions.
- 2) We are required to comply with the International Standards for Professional Practice of Internal Auditing and have provided you with guidance on those standards and designed our scope to ensure we meet those standards.
- 3) As of September 30, 2021, the Metrics related to the Performance Funding model are being submitted in accordance with the BOG's data definitions and instructions.
- 4) We are responsible for selecting the criteria and for determining that such criteria are appropriate for our purposes. See attachment I for procedures identified by management.
- 5) There are no known matters contradicting the submissions of the metrics being submitted to the BOG.
- 6) There have been no communications from regulatory agencies, internal auditors, other independent practitioners or consultants relating to the file submissions including communications received between September 30, 2021 and February 17, 2022, other than what we have already disclosed to you, if applicable.
- 7) We have provided you with access to all records that we believe are relevant to the Performance Funding Metric submissions and the agreed-upon procedures.
- 8) We have responded fully to all inquiries made to us by you during the engagement.
- 9) The only events that have occurred subsequent to September 30, 2021 that would require adjustment to or modification of the Performance Funding Metric submissions are relative to the finding contained in your Independent Accountant's Report.

New College of Florida

Alexander Tzoumas, CIA, CISA, CFE, CRMA, CDPSE
Chief Audit Executive/Chief Compliance Officer



Data Integrity Certification

March 2022

University Name: New College of Florida

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

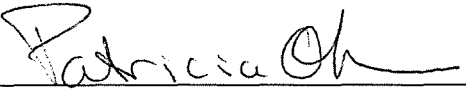
| Data Integrity Certification Representations | | | |
|--|-------------------------------------|--------------------------|----------------------------|
| Representations | Yes | No | Comment / Reference |
| 1. I am responsible for establishing and maintaining, and have established and maintained, effective 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 Emergence or Preeminence Status. | <input checked="" type="checkbox"/> | <input type="checkbox"/> | |
| 2. These internal controls and monitoring activities include, but are not limited to, reliable processes, controls, and procedures designed to ensure that data required in reports filed with my Board of Trustees and the Board of Governors are recorded, processed, summarized, and reported in a manner which ensures its accuracy and completeness. | <input checked="" type="checkbox"/> | <input type="checkbox"/> | |
| 3. In accordance with Board of Governors Regulation 1.001(3)(f), my Board of Trustees has required that I maintain an effective information system to provide accurate, timely, and cost-effective information about the university, and shall require that all data and reporting requirements of the Board of Governors are met. | <input checked="" type="checkbox"/> | <input type="checkbox"/> | |
| 4. In accordance with Board of Governors Regulation 3.007, my university provided accurate data to the Board of Governors Office. | <input checked="" type="checkbox"/> | <input type="checkbox"/> | |
| 5. In accordance with Board of Governors Regulation 3.007, I have appointed a Data Administrator to certify and manage the submission of data to the Board of Governors Office. | <input checked="" type="checkbox"/> | <input type="checkbox"/> | |

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. | <input checked="" type="checkbox"/> | <input type="checkbox"/> | |
| 7. When critical errors have been identified, through the processes identified in item #6, a written explanation of the critical errors was included with the file submission. | <input checked="" type="checkbox"/> | <input type="checkbox"/> | |
| 8. In accordance with Board of Governors Regulation 3.007, my Data Administrator has submitted data files to the Board of Governors Office in accordance with the specified schedule. | <input checked="" type="checkbox"/> | <input type="checkbox"/> | |
| 9. In accordance with Board of Governors Regulation 3.007, my Data Administrator electronically certifies data submissions in the State University Data System by acknowledging the following statement, "Ready to submit: Pressing Submit for Approval represents electronic certification of this data per Board of Governors Regulation 3.007." | <input checked="" type="checkbox"/> | <input type="checkbox"/> | |
| 10. I am responsible for taking timely and appropriate preventive/ corrective actions for deficiencies noted through reviews, audits, and investigations. | <input checked="" type="checkbox"/> | <input type="checkbox"/> | |
| 11. I recognize that 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. | <input checked="" type="checkbox"/> | <input type="checkbox"/> | |

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. | <input checked="" type="checkbox"/> | <input type="checkbox"/> | |
| 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. | <input checked="" type="checkbox"/> | <input type="checkbox"/> | |

| Data Integrity Certification Representations, Signatures | |
|--|---------------------------|
| <p>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.</p> | |
| Certification: <u></u> President | Date <u>Feb. 21, 2022</u> |
| <p>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.</p> | |
| Certification: _____ Board of Trustees Chair | Date _____ |