



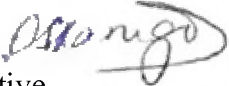
Office of the President
Office of Internal Audit

720 S.W. 2nd Avenue
PO Box 113025
Gainesville, FL 32601-3025
352-392-1391

November 10, 2021

MEMORANDUM

TO: UF Board of Trustees Audit and Compliance Committee

FROM: Dhanesh Raniga 
Chief Audit Executive

SUBJECT: Performance Based Funding and Preeminence Metrics – Data Integrity Audit

We have completed our internal audit procedures with respect to the University of Florida's data submission process for the data metrics used for the Board of Governors' (BOG) performance-based funding initiative and preeminent designation status. Our internal audit covered the submissions data from October 1, 2020, to September 30, 2021, and was undertaken to comply with the Florida Statute requirements.

The objective of the internal audit was to assess the adequacy of controls in place to promote the completeness, accuracy, and timeliness of data submitted to the BOG and provide assurance that the university's data submissions comply with the data definitions for the period ended September 30, 2021. The background, objectives and scope of the internal audit, conclusion and overall report rating are included on pages one to four of the attached report.

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. It should be recognized that controls are designed to provide reasonable, but not absolute, assurance that errors and irregularities will not occur and that procedures are performed in accordance with management's intentions. There are inherent limitations that should be recognized in considering the potential effectiveness of any system of controls. In the performance of most control procedures, errors can result from a misunderstanding of instructions, mistakes in judgment, carelessness, or other personal factors. Control procedures can be circumvented intentionally by management either with

respect to the execution and recording of transactions or with respect to the estimates and judgments required in the processing of data.

Further, the projection of any evaluation of control to future periods is subject to the risk that the procedures may become inadequate because of changes in conditions and that the degree of compliance with the procedures may deteriorate.

We sincerely appreciate the cooperation and assistance provided to us during the internal audit. We would be pleased to discuss further any aspect of our internal audit procedures or this report. Please do not hesitate to call me if you have any questions or require any additional information.

DR: dh

cc: President Fuchs
Provost and Senior Vice President for Academic Affairs
Senior Vice President and Chief Operating Officer
Senior Vice President and Chief Financial Officer
Assistant Provost, Institutional Planning and Research
Auditor General

UNIVERSITY OF FLORIDA

OFFICE OF INTERNAL AUDIT

PERFORMANCE BASED FUNDING AND PREEMINENCE METRICS –
DATA INTEGRITY

Report Issue Date:	November 10, 2021
Report Number:	UF-22-775-13

UNIVERSITY OF FLORIDA

**PERFORMANCE BASED FUNDING AND PREEMINENCE METRICS –
DATA INTEGRITY**

As of September 30, 2021

TABLE OF CONTENTS

AUDIT REPORT

Background.....	1
Objectives and Scope.....	1
Good Management Practices and Internal Controls.....	2
Overall Conclusion.....	3
Attachment A: Performance Based Funding and Preeminence Metrics	
Attachment B: Data Integrity Certification Form – March 2022	

INTERNAL AUDIT PERSONNEL

Audit conducted by: Lily Ly, Audit Manager
Audit supervised by: Joe Cannella III, Audit Director

PERFORMANCE BASED FUNDING AND PREMINENCE METRICS – DATA INTEGRITY

Background

Florida Statutes 1001.92 and 1001.7065 promulgate the establishment of the funding for the State University System Performance-based Incentive ('performance-based funding' or 'PBF') and the Preeminent State Research Universities Program. Florida Statute 1001.706 (5) (C) requires the State University System Board of Governors (BOG) to define the data components and methodology used to implement the Statutes.

The PBF Model includes metrics to evaluate the institution's performance in a variety of strategic areas. One metric is institution-specific and chosen by each university's Board of Trustees (BOT) while the other metrics are common to all institutions. For the 2021-2022 fiscal year, the University of Florida (University) was allocated approximately \$106m in PBF-related funding (allocation of State Investment (\$50m) and allocation of Institutional Investment (\$56m)).

Similarly, the Preeminent State Research Universities program was established to award those universities that demonstrate high performance toward academic and research excellence. The universities must meet or exceed the benchmarks to earn the preeminence designation. The University has achieved preeminence designation since the inception of the program in 2013. The state has not allocated any preeminent funding since the 2018-2019 fiscal year.

The BOG maintains a web-based State University Database System (SUDS) to allow data administrators (DA) to submit data on behalf of their university. The DA role is prescribed by BOG Regulation 3.007(2), which requires each university president to appoint an institutional DA to certify and manage the submission of data to the SUS management information system. The president has formally appointed the assistant provost for Institutional Planning and Research (IPR) as the DA for the University to serve as the official point of contact with the BOG for submission of data and reports. The IPR coordinates with the various offices responsible for the extraction and compilation of the institutional data that support the BOG submissions for the respective metrics and performs quality checks prior to certifying the submission to the BOG/SUDS. Attachment A provides information on each of the metrics and the University's scores for Performance-Based Funding and Preeminence metrics, as reported in the 2021 Accountability Plan and the data submissions used to support the metrics.

Objectives and Scope

Florida Statute section 1001.706 (5) (e) requires each university to conduct an annual audit to verify that the data submitted pursuant to Florida Statutes 1001.92 and 1001.7065 complies with the data definitions established by the BOG. The results of the annual audit are required to be submitted to the BOG Office of Inspector General as part of each university's annual certification process. Accordingly, the objective of our internal audit was to comply with the Florida Statute requirements and to:

- Assess the adequacy of controls in place to promote the completeness, accuracy, and timeliness of the data submitted to the BOG.
- Provide assurance that the University's data submitted for the PBF, and the Preeminence metrics complies with the established data definitions for the period ended September 30, 2021.
- Provide an objective basis of support for the University president and the University BOT chair to sign the Data Integrity Certification Form (Attachment B).

We performed our fieldwork from August 2, 2021 through October 21, 2021, and covered the submissions from October 1, 2020, through September 30, 2021. During the course of our internal audit, we interviewed data owners, performed analytical reviews, evaluated risks related to each metric, reviewed program changes, performed process walkthroughs, and validated submitted records to the source system of records. This audit solely addresses the university's processes and data submissions to the BOG that support the metrics. The BOG obtains specific data for Preeminence metrics directly from external sources. External data and calculations performed by the BOG to derive the final score for the metrics were not included in the scope of this audit.

Audit Approach and Methodology

This audit is the eighth annual audit that we have performed as required by the state. Consequently, our audit approach was risk-based and relied on our accumulated knowledge and understanding of the key business processes for data collection and submission.

Our risk analysis considered changes in the information systems and internal procedures for the extraction, review, and submission processes. We also considered staffing changes, changes in reporting requirements between years, variances in the data reported, and the scores reported.

The University implemented a program to modernize its student information system which resulted in retiring its mainframe computer in October 2019. This project, which was named COMPASS (Campus-wide Modernization Program to Advance Student services), included a number of new systems and enhancements. A new student information system, PeopleSoft's Campus Solutions (CS), was implemented in Fall 2018, while a new admissions system, SLATE, was implemented during the 2019-20 admissions cycle. The reporting of student data and the associated programming logic has continually evolved as the University has refined its business processes and the new systems have stabilized. Based on our assessment and familiarity with these processes, we focused our assessment on key controls for the generation and validation of SUDS submissions in concurrence with testing the key data elements identified by the BOG. Our procedures included assessing the following:

- IPR data quality review and submission procedures, including access controls and the role of the DA in this process
- Data compilation, validation and submission procedures at the various departments and the required IT controls
- Independent testing and validation of the data submission to source records
- Timeliness of submissions
- An analysis of resubmissions, if any

In addition to our detailed review of procedures at IPR and UFIT, a summary of the applicable submissions and data owners is presented with each metric as outlined in Attachment A.

Good Management Practices and Internal Controls

We noted the following good management practices and key controls during our assessment:

- Data owners formally certify the completeness and accuracy of data to be submitted prior to IPR's review of the data.
- IPR maintains a Portal as a repository of the data owner certifications, checklists, and detailed procedures performed by IPR in validating each submission file. A Data Quality Review Summary documents data issues noted for each submission and serves as a reference/knowledge base for future submissions.
- IPR uses analytical tools, including automated Statistical Analysis System (SAS) reports, to identify missing values or issues based on other institutional reporting and comparisons to previous year values to identify shifts that would require researching.

- The DA has taken a proactive role in fostering a collaborative culture among core offices and enhancing accountability through bi-weekly meetings with the data owners which allows timely discussions regarding file submissions. The DA promotes data stewardship on campus by working with the different functional areas to resolve data issues, improve data quality, and assure that external reporting requirements are met.
- Access to SUDS must be formally approved by a supervisor and the DA. Monthly, IPR reviews the list of active SUDS users to ensure that only authorized individuals have access to upload, submit, and view submissions data.
- A shared drive is used by the data owners and UFIT staff to document their quality control and validation procedures for each file submission and includes narratives, supporting reports, and email communications. These procedures include reviewing SUDS edit reports and internal queries of source systems to identify errors or data inconsistencies.
- Data owners run reports throughout the year to monitor known issues that have caused corrections during a previous file build. Data owners work with UFIT to create additional monitoring reports or modify programming codes to detect or prevent these errors, as appropriate.
- Change management procedures include testing by data owners to ensure that the change is producing the desired results and must have documented approval from the data owner before implementing in production for all programming code changes. If the change impacts the file build or its data, they are logged. Updated Structured Query Language for each change is attached to the log for future reference.

Overall Conclusion

We noted that the submissions during the current period were timely and there were no resubmissions required. Based on the results of our audit procedures, we conclude that controls over the University's data submission process for the period under review are adequate to provide assurance that the data submitted for PBF and preeminent metrics pursuant to Florida Statutes 1001.92 and 1001.7065 is complete, accurate, and timely and complies with the data definitions established by the BOG.

AUDIT RATING	OVERALL RATING	DESCRIPTION
✓	ADEQUATE	No significant unmitigated risks (financial and/or operational, compliance, strategic) that require management's immediate attention. The control environment as designed and evaluated is adequate, appropriate, and effective to provide reasonable comfort that risks are being managed and that significant business objectives are achieved. Opportunity for improvement exists, and management is generally aware of risks.

CRITERIA FOR ASSIGNING OVERALL REPORT RATING	
OVERALL RATING	DESCRIPTION
ADEQUATE	No significant unmitigated risks (financial and/or operational, compliance, strategic) that require management's immediate attention. The control environment as designed and evaluated is adequate, appropriate, and effective to provide reasonable comfort that risks are being managed and that significant business objectives are achieved. Opportunity for improvement exists, and management is generally aware of risks.
NEEDS IMPROVEMENT	A few unmitigated risks (financial and/or operational, compliance, strategic) exist that could significantly impact management's ability to achieve business objectives and reliable management information. These risks require management's prompt attention.
NEEDS SIGNIFICANT IMPROVEMENT	Significant risks (financial and/or operational, compliance, strategic) exist that require management's immediate attention. When considered in the aggregate, these risks indicate significant weaknesses in the design or operating effectiveness of internal controls. Overall, risk exposure is unacceptable.

Performance Based Funding Metrics

#	Description	Data Files	Data Owners	Excellence ¹		Improvement ²		Final Score ³
				Data	Points	Data	Points	
1	Percent of Bachelor's Graduates Enrolled of Employed (\$25,000+) <i>One year after graduation</i>	SIFD	Registrar	75.2%	10	3.4%	6	10
2	Median Wages of Bachelor's Graduates Employed Full-Time <i>One year after graduation</i>	SIFD	Registrar	\$48,500	10	8.0%	10	10
3	Cost to the Student <i>Net Tuition & Fees per 120 Credit Hours</i>	SIF HTD SFA	Undergraduate Affairs, Student Financial Affairs, Registrar, Bursar	(\$3,750)	10	271.0%	10	10
4	Four Year Graduation Rate <i>Full-time FTIC</i>	SIF SIFD RET	Registrar	70.7%	10	-0.2%	0	10
5	Academic Progress Rate <i>2nd Year Retention with GPA 2.0</i>	SIF RET	Registrar	96.3%	10	0.8%	1	10
6	Bachelor's Degree Awarded in Areas of Strategic Emphasis	SIFD	Registrar	58.8%	10	-0.4%	0	10
7	University Access Rate <i>Percent of Undergraduate with a Pell-Grant</i>	SIF SFA	Registrar, Student Financial Affairs	25.8%	5	-1.4%	0	5
8	Graduate Degrees Awarded in Areas of Strategic Emphasis	SIFD	Registrar	67.5%	10	-1.9%	0	10
9a	Two-Year Graduation Rate for FCS Associate in Arts Transfer Student	SIF SIFD RET	Registrar	38.5%	2	-4.0%	0	2
9b	Six-Year Graduation Rate for Students who are Awarded a Pell Grant in their First Year	SIF SIFD RET SFA	Registrar, Student Financial Affairs	85.2%	5	-0.5%	0	5
10	BOT Choice: Six Year Graduation Rate	SIF SIFD RET	Registrar	88.8%	5	0.4%	0	5
Final Score Total⁴								87

¹ Excellence points are based on current year performance.

² Improvement is calculated based on the current year performance minus previous year performance.

³ For each metric, the final score is based on the higher of Excellence or Improvement points.

⁴ For 2021, all scores are based on Excellence Points

Preeminence Metrics

Metric	Description	Source	Data Owner	2021
1a	Average High School GPA <i>an average weighted grade point average of <u>4.0 or higher</u> for incoming freshman in Fall semester</i>	SUDS*	Admissions	4.5
1b	Average SAT Score <i>an average SAT score <u>1200 or higher</u> for incoming freshman in Fall semester. Note: Beginning in Fall 2020, the metric also includes ACT scores that have been translated into the SAT scale.</i>	SUDS*	Admissions	1382
2	Public University National Ranking <i>A top-50 ranking on <u>at least two</u> well-known and highly respected national public university rankings</i>	Various**	N/A	10
3	Freshman Retention Rate <i><u>90 percent or higher</u> for full-time, first-time-in-college students</i>	SUDS*	Registrar	97%
4	Four-Year Graduation Rate <i><u>60 percent or higher</u> for full-time, first-time-in-college students</i>	SUDS*	Registrar	71%
5	National Academy Membership <i><u>Six or more</u> faculty members at the state university who are members of a national academy</i>	Academy Directory**	N/A	28
6	Total Annual Research Expenditures (\$M) <i>Total annual research expenditures, including federal research expenditures, <u>of \$200 million or more</u></i>	National Science Foundation**	Research and Cost Analysis	\$890
7	Total Annual R&D Expenditures in Non-Health Sciences <i>Total annual research expenditures in diversified nonmedical sciences <u>of \$150 million or more</u></i>	National Science Foundation**	Research and Cost Analysis	\$562
8	National Ranking in Research Expenditures <i>A top-100 university national ranking for research expenditures in <u>five or more</u> science, technology, engineering, or mathematics fields of study</i>	National Science Foundation**	Research and Cost Analysis	8
9	Utility Patents Awarded <i><u>One hundred or more</u> total patents awarded by the United States Patent and Trademark Office for the most recent 3-year period</i>	US Patent Office**	Technology Licensing	377
10	Doctoral Degrees Awarded <i><u>Four hundred or more</u> doctoral degrees awarded annually</i>	SUDS*	Registrar	1,495
11	Number of Post-Doctoral Appointees <i><u>Two hundred or more</u> postdoctoral appointees annually</i>	National Science Foundation**	Human Resources	671
12	Endowment Size (\$M) <i>An endowment of <u>\$500 million or more</u></i>	NACUBO**	UF Foundation	\$1,847

* The SUDS file submissions are ADM, SIF, SIFD, and RET

** BOG obtains data from external agencies



Data Integrity Certification

March 2022

University Name: _____

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-preeminence Status.	<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"/>	
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 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 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 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 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"/>	
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"/>	
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"/>	
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"/>	
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 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 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 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> <p>Certification: _____ Date _____ <div style="text-align: center;">President</div></p>
<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> <p>Certification: _____ Date _____ <div style="text-align: center;">Board of Trustees Chair</div></p>



Data Integrity Certification

March 2022

University Name: University 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 Emerging-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>	
<p>Certification: _____ <div style="text-align: center; margin-top: -20px;"> </div> <p style="text-align: center;">President</p> </p>	<p>Date: <u>12/2/21</u></p>
<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>	
<p>Certification: _____ <div style="text-align: center; margin-top: -20px;"> </div> <p style="text-align: center;">Board of Trustees Chair</p> </p>	<p>Date: <u>12/2/21</u></p>