



**Office of  
Internal Audit**

FLORIDA INTERNATIONAL UNIVERSITY

**Audit of Performance Based Funding and  
Emerging Preeminent Metrics Data Integrity  
Report No. 23/24-04  
January 16, 2024**

# **FIU** | Office of Internal Audit

**Date:** January 16, 2024

**To:** Hiselgis Perez, Associate Vice President of Office of Analysis and Information Management

**From:** Trevor L. Williams, Chief Audit Executive



**Subject:** **Audit of Performance Based Funding and Emerging Preeminent Metrics Data Integrity, Report No. 23/24-04**

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Since 2014, the State University System of Florida Board of Governors (BOG) has utilized a performance-based funding program, based on 10 performance metrics, to evaluate Florida's public universities. For fiscal year 2023-2024, the Florida Legislature and Governor allocated \$645 million in performance-based awards, of which FIU received \$72.4 million for being ranked first. Additionally, since 2019, FIU has been designated an emerging preeminent state research university pursuant to Florida Statute 1001.7065.

As required by BOG Regulation 5.001(8) and Florida Statute 1001.706, we have audited the data integrity related to the University's performance-based funding and emerging preeminent metrics. Our audit objectives were to (1) determine whether the processes established by the University ensure the completeness, accuracy, and timeliness of data submissions to the BOG that support said metrics; (2) determine whether prior audit recommendations have been implemented; and (3) provide an objective basis of support for the University President and the Board of Trustees Chair to sign the representations made in the *Data Integrity Certification* for Performance-based Funding and Emerging-preeminence status to be filed with the BOG by the first business day of March 2024.

Our audit confirmed that FIU continues to have good process controls for maintaining and reporting performance and emerging preeminent metrics data. Overall, the system continues to function in a reliable manner, in all material respects.

We want to take this opportunity to express our appreciation to you and your staff for the cooperation and courtesies extended to us during the audit.

C: FIU Board of Trustees

Kenneth A. Jessell, University President

Elizabeth M. Béjar, Provost, Executive Vice President, and Chief Operating Officer

Aime Martinez, Chief Financial Officer and Vice President for Finance and Administration

Javier I. Marques, Vice President for Operations and Safety and Chief of Staff, Office of the President

Robert Grillo, Vice President, Information Technology; Chief Information Officer

Brigitte Cram, Vice President, Academic Affairs: Student Success Operations and Integrated Planning

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# EXECUTIVE SUMMARY

## Introduction

Beginning in fiscal year 2013-2014, the State University System of Florida Board of Governors (BOG) instituted a performance-based funding program predicated on 10 performance metrics used to evaluate Florida's public universities. For fiscal year 2023-2024, FIU ranked first and received \$72.4 million of the \$645 million (11.2%) distributed by the Florida Legislature and Governor. Furthermore, in 2019, the University achieved sufficient preeminent metrics to receive the designation of an emerging preeminent state research university and that designation continued during our audit period.

## What We Did

As required by the BOG, we performed this audit to determine whether the processes established by the University ensure the completeness, accuracy, and timeliness of data submissions to the BOG that support the University's Performance Based Funding and Emerging Preeminent Metrics.

## What We Concluded

In summary, we concluded that the University continues to have effective process controls for maintaining and reporting performance metrics data. In our opinion, the process, in all material respects, continues to function in a reliable manner.

- We compared the information submitted to the BOG to the data contained in PantherSoft as it relates to the six elements relevant to Performance Based Funding Metrics 6 and 8. We observed no differences between the data.
- We tested four of the Emerging Preeminent Metrics and found the data reported to be accurate and consistent with the definitions and methodologies outlined in the BOG's *Preeminent Metrics Methodology Document*.
- We reviewed the data file submissions and resubmissions. Our review disclosed that the process provides reasonable assurance that complete, accurate, and timely submissions occurred.
- We obtained the list of the University initiatives meant to bring FIU's operations and practices in line with the SUS Strategic Plan goals. We determined the initiatives do not appear to have been created to inflate or otherwise manipulate performance goals.

We found no adverse reportable conditions. The areas audited and procedures performed are detailed in the Observations section beginning on page 8 of this report.

## **OBJECTIVES, SCOPE, AND METHODOLOGY**

Pursuant to the State University System (SUS) of Florida Board of Governors Regulation 5.001(8) and Florida Statute 1001.706, we have completed an audit of the data integrity and processes utilized in the University's Performance Based Funding (PBF) and Emerging Preeminent Metrics. Our audit entailed an examination of data files submitted to the BOG between September 1, 2022, and August 31, 2023. The primary objectives of our audit were to:

- (a) Determine whether the processes established by the University ensure the completeness, accuracy, and timeliness of data submissions to the BOG that support the University's Performance Based Funding and Emerging Preeminent Metrics;
- (b) Determine whether prior audit recommendations have been implemented; and
- (c) Provide an objective basis of support for FIU Board of Trustees Chair and the University President to sign the representations made in the *Data Integrity Certification*, which will be submitted to the Board of Trustees and filed with the BOG by March 1, 2024.

Our audit was conducted in conformance with the *International Standards for the Professional Practice of Internal Auditing* promulgated by The Institute of Internal Auditors and *IS Audit and Assurance Standards* issued by ISACA, and included an examination of the supporting records, systems, and processes and the performance of such other auditing procedures, as we considered necessary under the circumstances.

The objective of our testing was to validate that the data submitted was unabridged and identical to the data contained in PantherSoft, the University's system of record. However, in certain circumstances as described within the individual metrics accuracy testing, we may have further validated the integrity of the data contained in PantherSoft. During the audit, we:

- Confirmed our understanding of the data flow process for all the relevant data files from the transactional level to their submission to the BOG;
- Interviewed key personnel, including AIM employees, functional unit leads, and those responsible for developing and maintaining the information systems;
- Reviewed BOG data definitions and methodology and meeting notes from the relevant groups within the BOG and FIU to identify changes to the PBF metrics;
- Observed current practices and data processing techniques; and
- Tested the accuracy of the data files for 2 of the 10 PBF metrics and 4 of the 10 emerging preeminent metrics achieved and submitted to the BOG as of August 31, 2023.

Sample sizes and elements selected for testing were determined on a judgmental basis applying a non-statistical sampling methodology.

We conducted our audit planning and fieldwork from September 2023 to December 2023. In fiscal year 2022-2023, we issued the report *Audit of Performance Based Funding and Emerging Preeminence Metrics Data Integrity*, (Report No. 22/23-06) and a separate management letter, dated February 10, 2023. The audit report offered five recommendations requiring follow-up. All four recommendations due for implementation through our audit report date have been implemented by management and were validated by us.

## BACKGROUND

The Florida Board of Governors has broad governance responsibilities affecting administrative and budgetary matters for Florida's 12 public universities. Beginning in fiscal year 2013-2014, the BOG instituted a performance-based funding program, which is predicated on 10 performance metrics used to evaluate the universities on a range of indicators, including graduation and retention rates, job placement, and access rate, among others. Two of the 10 performance metrics are "choice metrics"—one selected by the BOG and one selected by each university's Board of Trustees. The 10 metrics pertaining to Florida International University are depicted in the following table.

FIU's Performance Based Funding Metrics			
1.	Percent of Bachelor's Graduates Enrolled or Employed (Earning \$40,000+) One Year After Graduation	6.	Bachelor's Degrees Within Programs of Strategic Emphasis
2.	Median Wages of Bachelor's Graduates Employed Full-time One Year After Graduation	7.	University Access Rate (Percent of Undergraduates with a Pell Grant)
3.	Cost to the Student Net Tuition and Fees for Resident Undergraduates per 120 Credit Hours	8.	Graduate Degrees Within Programs of Strategic Emphasis
4.	Four-Year FTIC (Full-time, First-Time-In-College) Graduation Rate	9a.	BOG Choice – Three-Year Graduation Rate for Florida College System Associate in Arts Transfer Students
		9b.	BOG Choice – Six-Year Graduation Rate for Students who are Awarded a Pell Grant in their First Year
5.	Academic Progress Rate (2 <sup>nd</sup> Year Retention with GPA above 2.0)	10.	Board of Trustees' Choice – Number of Post-Doctoral Appointees

In 2016, the Board of Governors' Performance-Based Funding Model was codified into law under Section 1001.66, F.S., *Florida College System Performance-Based Incentive*.

The Performance Funding Program also has four key components:

1. Institutions are evaluated and receive a numeric score for either Excellence or Improvement relating to each metric.
2. Data is based on one-year data.
3. The benchmarks for Excellence were based on the Board of Governors' 2025 System Strategic Plan goals and analysis of relevant data trends, whereas the benchmarks for Improvement were decided after reviewing data trends for each metric.

4. The Florida Legislature and Governor determine the amount of new state funding and the proportional amount of institutional funding that would come from each university's recurring state-base appropriation.

The following table summarizes the performance funds allocated for the fiscal year 2023-2024 using the results of the performance metrics from fiscal year 2022-2023, wherein FIU ranked first with 95 points.

<b>Florida Board of Governors Performance Funding Allocation 2023-2024<sup>1</sup></b>				
	<b>Normalized Score</b>	<b>Institutional Investment Allocation</b>	<b>Final State Investment Allocation<sup>2</sup></b>	<b>Total Performance Funding Allocation</b>
FAMU	78	\$13,438,040	\$15,943,438	\$29,381,478
FAU	82	21,265,474	25,230,224	46,495,698
FGCU	74	12,253,765	14,538,365	26,792,130
<b>FIU</b>	<b>95</b>	<b>32,836,760</b>	<b>39,524,754</b>	<b>72,361,514</b>
FL Poly	86	4,944,006	5,865,769	10,809,775
FSU	94	48,517,371	58,122,913	106,640,284
NCF	65	3,705,243	2,198,026	5,903,269
UCF	89	35,410,573	42,012,544	77,423,117
UF	90	57,527,517	68,789,090	126,316,607
UNF	79	13,379,105	15,873,514	29,252,619
USF	90	41,839,051	50,175,657	92,014,708
UWF	82	9,883,095	11,725,706	21,608,801
<b>Totals</b>		<b>\$295,000,000</b>	<b>\$350,000,000</b>	<b>\$645,000,000</b>

Source: BOG

Pursuant to section 1001.706(5)(e), Florida Statutes:

*Each university shall conduct an annual audit to verify that the data submitted pursuant to ss. 1001.7065 and 1001.92 complies with the data definitions established by the board and submit the audits to the Board of Governors Office of Inspector General as part of the annual certification process required by the Board of Governors.*

<sup>1</sup> The amount of state investment is appropriated by the Legislature and Governor. A prorated amount is deducted from each university's base recurring state appropriation (Institutional Investment) and is reallocated to each institution based on the results of the performance-based funding metrics (State Investment).

<sup>2</sup> Top 3 institutions (including ties) receive 100% of their allocation of the state investment. Universities with a score the same or higher as the previous year receive 100% of their allocation of the state investment. If a university's score decreases for 2 consecutive years, the university may receive up to 100% of their allocation of the state investment after presenting/completing a student success plan.



In addition to the data integrity audit for the Performance-Based Funding Model, universities designated as preeminent or emerging preeminent must conduct a similar audit for the data and metrics used for preeminence status consideration. The BOG permits this audit either to be included with or separate from the Performance Based Funding Data Integrity audit.

In 2019, Florida International University achieved sufficient preeminent metrics to qualify for designation as an emerging preeminent state research university by the authority of Florida Statute 1001.7065, and that designation continued during our audit period. Emerging Preeminent status is achieved upon meeting a minimum of 6 of the 12 metrics, while Preeminent status requires meeting 11 of the 12 metrics. The following table lists the 12 preeminent metrics and highlights in **bold type** the 10 metrics the University met, specifically metrics A, B, C, E, F, G, H, I, J, and K.

<b>FIU's Emerging Preeminent Metrics</b>			
<b>A.</b>	<b>Average GPA and SAT/ACT Score</b>	<b>G.</b>	<b>Total Amount R&amp;D Expenditures in Non-Health Sciences</b>
<b>B.</b>	<b>Public University National Ranking</b>	<b>H.</b>	<b>National Ranking in Research Expenditures</b>
<b>C.</b>	<b>Freshman Retention Rate (Full-Time, First-Time-In-College)</b>	<b>I.</b>	<b>Patents Awarded (over a 3-year period)</b>
D.	Four-Year Graduation Rate (Full-Time, First-Time-In-College)	<b>J.</b>	<b>Doctoral Degrees Awarded Annually</b>
<b>E.</b>	<b>National Academy Memberships</b>	<b>K.</b>	<b>Number of Post-Doctoral Appointees</b>
<b>F.</b>	<b>Total Annual Research Expenditures (Science &amp; Engineering only)</b>	L.	Endowment Size

## OVERALL ASSESSMENT OF INTERNAL CONTROLS

Our overall assessment of internal controls is presented in the table below.

INTERNAL CONTROLS ASSESSMENT			
CRITERIA	SATISFACTORY	OPPORTUNITIES TO IMPROVE	INADEQUATE
Process Controls	X		
Policy & Procedures Compliance	X		
Effect	X		
Information Risk	X		
External Risk	X		
INTERNAL CONTROLS LEGEND			
CRITERIA	SATISFACTORY	OPPORTUNITIES TO IMPROVE	INADEQUATE
<b>Process Controls:</b> Activities established mainly through policies and procedures to ensure that risks are mitigated, and objectives are achieved.	Effective	Opportunities exist to improve effectiveness	Do not exist or are not reliable
<b>Policy &amp; Procedures Compliance:</b> The degree of compliance with process controls – policies and procedures.	Non-compliance issues are minor	Non-compliance issues may be systematic	Non-compliance issues are pervasive, significant, or have severe consequences
<b>Effect:</b> The potential negative impact to the operations- financial, reputational, social, etc.	Not likely to impact operations or program outcomes	Impact on outcomes contained	Negative impact on outcomes
<b>Information Risk:</b> The risk that information upon which a business decision is made is inaccurate.	Information systems are reliable	Data systems are mostly accurate but need to be improved	Systems produce incomplete or inaccurate data which may cause inappropriate financial and operational decisions
<b>External Risk:</b> Risks arising from events outside of the organization’s control; e.g., political, legal, social, cybersecurity, economic, environment, etc.	None or low	Potential for damage	Severe risk of damage

## **OBSERVATIONS**

### **Data Accuracy Testing – Performance Based Funding Metrics**

This is our tenth audit of the PBF Metrics since it became effective in 2014. During our first-year audit, we performed data accuracy testing on all 10 metrics as requested by the BOG. In subsequent years' audits, since we have consistently deemed internal controls satisfactory, we have taken a risk-based approach and have limited our data accuracy testing to specific metrics and follow-up on any prior year recommendations. Our choice of metrics to audit was based on distinct factors: audit risk, changes to the metric, and the time elapsed since the metric was last audited. For this year's audit, we selected Metrics 6 and 8 for testing.

The data for Metrics 6 and 8 is generated from the SIFD Degrees Awarded files submitted by the University. To complete our testing, Management provided us with the in-scope data elements for each metric subject to our audit testing (see Appendix I – In-scope BOG Data Elements on page 14), which we confirmed with staff at the BOG's Office of Data & Analytics (ODA).

***Metric 6 – Bachelor's Degrees Within Programs of Strategic Emphasis is based on the number of baccalaureate degrees awarded within the programs designated by the Board of Governors as 'Programs of Strategic Emphasis'. A student who has multiple majors in the subset of targeted Classification of Instruction Program codes will be counted twice (i.e., double-majors are included).***

***Metric 8 – Graduate Degrees Within Programs of Strategic Emphasis is based on the number of graduate degrees awarded within the programs designated by the Board of Governors as 'Programs of Strategic Emphasis'. A student who has multiple majors in the subset of targeted Classification of Instruction Program codes will be counted twice (i.e., double-majors are included).***

To verify the data submitted to the BOG was accurate, we judgmentally selected a sample of 30 students (bachelor's and graduate degrees) from the Fall 2022 SIFD Degrees Awarded file and verified that the data submitted to the BOG agreed with the data found in the students' records in PantherSoft. We verified the accuracy of the data for the six elements relevant to the Degrees Awarded file without exception.

In addition, as part of our testing of the SIFD Degrees Awarded file, we reconciled the number of degrees awarded that was reported to the BOG to the records maintained by the Office of the Registrar without exception.

### **Conclusion**

Our testing of the SIFD Degrees Awarded file found no differences between the information submitted to the BOG and the data contained in PantherSoft as it relates to the six elements relevant to Metrics 6 and 8.

## Data Accuracy Testing – Emerging Preeminent Metrics

In 2023, the University achieved 10 of the 12 Preeminence metrics, once again earning its Emerging Preeminent designation. We selected 4 of the 10 metrics achieved for testing as follows:

- Metric A – Average GPA and SAT/ACT Score
- Metric E – National Academy Memberships
- Metric H – National Ranking in Research Expenditures
- Metric J – Doctoral Degrees Awarded Annually

We used the BOG's *Preeminent Metrics Methodology Document* ("Preeminent Methodology") issued in October 2020 to determine the elements for testing. Based on the document, we tested the accuracy of the data used for the four metrics by obtaining the respective University files and reviewing them against the data in PantherSoft and/or the data maintained by the respective organizations associated with each metric, specifically, the National Science Foundation (NSF) and the National Academy of Sciences, Engineering, and Medicine.

### Metric A – Average GPA and SAT/ACT<sup>3</sup> Score

*An average weighted grade point average of 4.0 or higher on a 4.0 scale and an average SAT score of 1200 or higher on a 1600-point scale or an average ACT score of 25 or higher on a 36 score scale, using the latest published national concordance table developed jointly by the College Board and ACT, Inc., for fall semester incoming freshmen, as reported annually.*

To test the accuracy of the 4.3 average GPA the University reported for this metric, we obtained the ADM Applicants Admits file for Fall 2022. We identified the first-time-in-college students who were newly admitted and registered during the Fall 2022 term and appropriately excluded the students with non-traditional or unavailable GPA information. From this subset of students, we selected a sample of 30 students and confirmed the reported GPA agreed to the students' records in PantherSoft and recalculated the group's average GPA of 4.3, without exception.

To confirm the accuracy of the 1286 average SAT/ACT score the University reported for this metric, we obtained the BOG's converted/concorded SAT/ACT scores derived from the score data provided by FIU. Using this report, we recalculated the average SAT/ACT score of 1286, without exception. In addition, we selected a sample of 30 students and confirmed the SAT/ACT scores in the report agreed to the students' records in PantherSoft, without exception.

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<sup>3</sup> Pursuant to the BOG approved 2023 Accountability Plan for FIU, "the 2020 Florida Legislature amended statute (1001.7065, FS) so that beginning in Fall 2020, this metric also includes ACT scores that have been translated into the SAT scale."

### Metric E – National Academy Memberships

*Six or more faculty members at the state university who are members of a national academy, as reported by the Center for Measuring University Performance in the Top American Research Universities (TARU) annual report or the official membership directories maintained by each national academy (National Academy of Sciences, Engineering, and Medicine).*

To test the accuracy of the data related to National Academy memberships, we confirmed the eight memberships the University reported via the academy directories. Five faculty were members of the National Academy of Medicine and three were members of the National Academy of Engineering.

### Metric H – National Ranking in Research Expenditures

*A top-100 university national ranking for research expenditures in five or more science, technology, engineering, or mathematics fields of study, as reported annually by the National Science Foundation (NSF).*

To test the accuracy of the data related to FIU's national ranking in research expenditures, we reviewed the NSF national rankings reports on the National Center for Science and Engineering Statistics online data tool. We confirmed that FIU was ranked in the top 100 in seven of the eight broad disciplines, without exception.

### Metric J - Doctoral Degrees Awarded Annually

*Four hundred or more doctoral degrees awarded annually, including professional doctoral degrees awarded in medical and health care disciplines.*

To test the accuracy of the number of Doctoral Degrees Awarded during the 2021-2022 academic year, we obtained the SIFD Degrees Awarded files for the applicable timeframe and identified the students who were awarded a doctoral degree during the period. The total doctoral degrees awarded totaled 513, which agreed to the number reported for the metric without exception.

### Conclusion

Our testing of the Emerging Preeminent Metrics found the data reported to be accurate and consistent with the definitions and methodologies outlined in the BOG's *Preeminent Metrics Methodology Document*.

## Data File Submissions and Resubmissions

### Data File Submissions

To ensure the timely submission of data, the Office of Analysis and Information Management (AIM) used the due date schedule provided by the BOG to keep track of the files due for submission and their due dates. AIM also maintains a schedule for each file to be submitted, which includes meeting dates with the functional unit leads, file freeze date, file due date, and actions (deliverables) for each date on the schedule. We used data received directly from the ODA, in addition to data provided by AIM, to review the timeliness of actual submittals.

### Data File Resubmissions

To determine the frequency of the resubmissions, we reviewed a list provided by the BOG staff for all files submitted pertaining to the 10 PBF metrics. The University submitted 12 files with due dates within our audit period of September 1, 2022, through August 31, 2023, of which four files required resubmission. In the instances observed, the BOG staff requested the resubmission of the RET and SIF files by reopening the State University Database System for resubmission.

The following tables describe the files resubmitted and AIM's reason for the resubmissions.

Resubmission File – Retention (RET)			
Period	Original Due Date	Original Submission Date	Resubmission Date
Annual 2021-2022	01/27/2023	01/27/2023	02/01/2023
<p>The BOG requested the resubmission of the RET file. Upon processing cohort exclusions in the original submission, the BOG database was unable to find demographic records for the submitted students.</p> <p><b>AIM's Reason for Resubmission:</b> The resubmission was requested by the BOG. Once the file was submitted and the BOG began processing cohort exclusions, the BOG database was unable to find demographic records for the submitted students. AIM is unfamiliar with the BOG's internal processes that ultimately resulted in not finding the demographic records. FIU has only been required to submit demographic records for students included in the PERSON_ID_CHGS table, but the BOG requested the demographic records information be sent for all retention cohort changes. Going forward, the demographic records will be included in the submission for students included in the RET_COHORT_CHGS table as well.</p>			

Resubmission Files – Student Instruction (SIF)			
Period	Original Due Date	Original Submission Date	Resubmission Date
Summer 2022	09/23/2022	09/23/2022	10/16/2023
Fall 2022	01/13/2023	01/13/2023	10/16/2023
Spring 2023	06/09/2023	06/09/2023	10/16/2023

Upon receiving a request for waiver counts, the BOG observed that FIU has consistently reported zero students receiving the 5007 (DCF - Non-State Custody) waiver. The BOG asked FIU to confirm if the data is correct, and if not, a resubmission of prior year data would be required. FIU discovered the waivers were mapped incorrectly. As a result, FIU resubmitted, and the BOG accepted, the SIF files for the Fall 2018 through Spring 2023 semesters. The resubmission does not affect metric results as the change only affected the classification of waivers and not the total amount of waivers issued.

**AIM's Reason for Resubmissions:** Positive Pathways, an organization that works with the Florida Department of Children and Families (DCF) requested DCF and homeless waiver counts by term from the BOG. It was brought to the BOG's attention that at least one institution had been rolling up waiver counts for some of these DCF waivers together. Upon retrieving the data, FIU had consistently reported zero students receiving the 5007 (DCF - Non-State Custody) waiver. For example, 5007 waivers being reported together with 5006. The FIU functional team proceeded to recheck the data and discovered the same findings. The functional team from the Financials office realized the financial account number (known internally as Item Type) had been mapped to BOG waiver 5006, instead of waiver 5007. Since the waiver is associated to a specific statute, the correction was necessary and the files were resubmitted.

Conclusion

Our review disclosed that the process used by the Data Administrator provides reasonable assurance that complete, accurate, and timely submissions occurred. Notwithstanding the increase in the number of resubmittals, the reasons for the resubmissions continue to be addressed by the Data Administrator. Therefore, we noted no reportable material weaknesses or significant control deficiencies related to data file submissions or resubmissions.

## Review of University Initiatives

We obtained the following list of the University initiatives that are meant to bring FIU's operations and practices in line with the SUS Strategic Plan goals to determine if any initiative was purposely made to inflate or manipulate performance goals.

- Implemented Educational and General revenue reallocation model.
- Implemented faculty reallocation model for academic units.
- Provided greater access to on-demand analytics relevant to the metrics.
- Leveraged student level graduation benchmarking to inform outreach interventions and course demand.
- Integration of career and academic advising.
  - Implemented required career readiness module for all first-year students.
- Engaged in skills mapping with Lightcast to align programs' curricula to industry-sought skills.
- Strategic enrollment planning via Noel Levitz.
- Continued to expand and refine scholarship, merit, and emergency aid programs to best serve our incoming and current students.
- Expanded and improved communication to students regarding information related to enrollment, financial aid, and student financials.
- Implemented centralized coordination and local deployment for student recruitment efforts.
- Expanded centralized retention, graduation, and student success outreach.
  - Nearly doubled the central student success outreach team from 6 to 10 full-time employees, which expanded the number/percent of students supported.
- Expanded the variety of predictive indicators used to inform student success outreach and strategy, targeting additional populations of students who may be at-risk for attrition or delayed graduation.
- Expanded efforts to reduce course scheduling-related barriers to student progression to graduation.
  - Increased access to actionable data related to course demand and offerings.
  - Implemented/expanded best practices related to course scheduling for student success.
- Held regular meetings with college leadership to discuss their student success goals, areas of opportunity, and strategies for improvement.

## Conclusion

Our review disclosed that none of the initiatives reported to us appear to have been made for the purposes of artificially inflating performance goals.



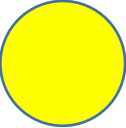




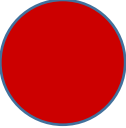



## APPENDIX I – IN-SCOPE BOG DATA ELEMENTS

No.	Metric	Definition	Submission/Table/Element Information	Relevant Submission
6	<b>Bachelor's Degrees Within Programs of Strategic Emphasis</b>	This metric is based on the number of baccalaureate degrees awarded within the programs designated by the Board of Governors as 'Programs of Strategic Emphasis'. A student who has multiple majors in the subset of targeted Classification of Instruction Program codes will be counted twice (i.e., double majors are included).	<b>Submission:</b> SIFD <b>Table:</b> Degrees Awarded <b>Elements:</b> 01081 – Degree Level Granted 01082 – Degree Program Category 01083 – Degree Program Fraction of Degree Granted 01412 – Term Degree Granted 02015 – Major Indicator 02001 – Reporting Time Frame	Summer 2022 Fall 2022 Spring 2023 Summer 2023* *Out of term/Late Degrees
8	<b>Graduate Degrees Within Programs of Strategic Emphasis</b>	This metric is based on the number of graduate degrees awarded within the programs designated by the Board of Governors as 'Programs of Strategic Emphasis'. A student who has multiple majors in the subset of targeted Classification of Instruction Program codes will be counted twice (i.e., double majors are included).	Same as No. 6 above.	Same as No. 6 above.

## APPENDIX II – COMPLEXITY RATINGS LEGEND

*Definition Source: BOG Performance Based Funding 2023 Metric Definitions*

Legend: Estimated Time of Completion		Legend: Complexity of Corrective Action	
	Estimated completion date of less than 30 days.		<b>Routine:</b> Corrective action is believed to be uncomplicated, requiring modest adjustment to a process or practice.
	Estimated completion date between 30 to 90 days.		<b>Moderate:</b> Corrective action is believed to be more than routine. Actions involved are more than normal and might involve the development of policies and procedures.
	Estimated completion date between 91 to 180 days.		<b>Complex:</b> Corrective action is believed to be intricate. The solution might require an involved, complicated, and interconnected process stretching across multiple units and/or functions; may necessitate building new infrastructures or materially modifying existing ones.
	Estimated completion date between 181 to 360 days.		
	Estimated completion date of more than 360 days.		<b>Exceptional:</b> Corrective action is believed to be complex, as well as having extraordinary budgetary and operational challenges.

\*The first rating symbol reflects the initial assessment based on the implementation date reported by Management, while the second rating symbol reflects the current assessment based on existing conditions and auditor's judgment.

## **APPENDIX III – OIA CONTACT AND STAFF ACKNOWLEDGMENT**

**OIA contact:**

Joan Liew 305-348-2107 or [jliew@fiu.edu](mailto:jliew@fiu.edu)

**Contributors to the report:**

In addition to the contact named above, the following staff contributed to this audit in the designated roles:

Leslie-Anne Triana (auditor in-charge);  
Stephanie Price (supervisor and reviewer);  
Vivian Gonzalez (reviewer); and  
Manuel Sanchez (independent reviewer).

### **Definition of Internal Auditing**

Internal auditing is an independent, objective assurance and consulting activity designed to add value and improve an organization's operations. It helps an organization accomplish its objectives by bringing a systematic, disciplined approach to evaluate and improve the effectiveness of risk management, control, and governance processes.



# Data Integrity Certification

## March 2024

In accordance with Board of Governors Regulation 5.001(8), university presidents and boards of trustees are to review, accept, and use the annual data integrity audit to verify the data submitted for implementing the Performance-based Funding model complies with the data definitions established by the Board of Governors.

Given the importance of submitting accurate and reliable data, boards of trustees for those universities designated as preeminent or emerging preeminent are also asked to review, accept, and use the annual data integrity audit of those metrics to verify the data submitted complies with the data definitions established by the Board of Governors.

**Applicable Board of Governors Regulations and Florida Statutes:** Regulations 1.001(3)(f), 3.007, and 5.001; Sections 1.001.706, 1001.7065, and 1001.92, Florida Statutes.

**Instructions:** To complete this certification, university presidents and boards of trustees are to review each representation in the section below and confirm compliance by signing in the appropriate spaces provided at the bottom of the form. Should there be an exception to any of the representations, please describe the exception in the space provided.

Once completed and signed, convert the document to a PDF and ensure it is ADA compliant. Then submit it via the Chief Audit Executives Reports System (CAERS) by the **close of business on March 1, 2024**.

**University Name:** Florida International University

### Data Integrity Certification Representations:

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. 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.
3. In accordance with Board of Governors Regulation 3.007, my university provided accurate data to the Board of Governors Office.

## Data Integrity Certification, March 2024


4. 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. The due diligence includes performing tests on the file using applications, processes, and data definitions provided by the Board Office. A written explanation of any identified critical errors was included with the file submission.
5. 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.
6. I am responsible for taking timely and appropriate preventive/ corrective actions for deficiencies noted through reviews, audits, and investigations.
7. 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.
8. 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.
9. 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.

Exceptions to Note: None

## Data Integrity Certification, March 2024

### 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: DocuSigned by:  
  
178D526292AA4C1...  
\_\_\_\_\_  
University President

Date: 2/21/2024

*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: DocuSigned by:  
  
C49A131E1D2E4B7...  
\_\_\_\_\_  
University Board of Trustees Chair

Date: 3/1/2024