



MEMORANDUM

TO: FAU BOT Audit and Compliance Committee
Mr. Adam Hasner, President

FROM: Reuben Christian Iyamu, Inspector General 

DATE: February 17, 2026

SUBJECT: **Audit of University Performance-Based Funding Data Integrity FY2026**
Report No. FY26-A-02

Pursuant to Florida Board of Governors (BOG) Regulation 5.001(8) and Florida Statute 1001.706, we have completed our annual audit of the University's Performance-Based Funding (PBF) data integrity. The audit objectives were to: (1) evaluate the effectiveness of the University's processes and internal controls to ensure the completeness, accuracy, and timeliness of data submissions to the Board of Governors (BOG); and (2) provide an objective basis of support for the University's President and Board of Trustees (BOT) Chair to sign the *Data Integrity Certification*.

We are submitting this report, which includes our conclusions and the response from the Provost and Executive Vice President for Academic Affairs. The report and the signed certification will be submitted to the BOG by March 1, 2026, after the report has been accepted by the University's BOT.

We thank the staff of the Offices of the Registrar, Student Financial Aid, Institutional Effectiveness & Analysis (IEA), and Information Technology for their full cooperation and assistance during this audit.

Respectfully Submitted,

cc: University Provost
Vice Presidents
Inspector General, Florida Board of Governors
Florida Auditor General
Jason Ball, Associate Provost & Chief Information Officer
Dr. Ying Liu, Assistant Provost for Institutional Effectiveness and Analysis (IEA)
Marie Claire DeMassi, University Registrar
Tracy Boulukos, Assistant Vice President for Financial Aid & Student Success Initiatives

Executive Summary

This is the twelfth consecutive year that the Florida Board of Governors (BOG) has required an annual data integrity audit to determine whether the University's processes ensure the completeness, accuracy, and timeliness of data submissions supporting Performance-Based Funding (PBF) metrics.

During this audit, we also tested the accuracy of data files submitted to the BOG between December 1, 2024, and November 30, 2025, which were used in calculating Performance-Based Funding metrics 4, 7, 9a, and 9b.

We concluded that the controls and processes established and implemented by FAU provide reasonable assurance of the completeness, accuracy, and timeliness of data submitted to the BOG for PBF decisions. **No reportable issues or material errors were identified that would affect FAU's overall ranking among State University System (SUS) institutions.** This audit supports the University's President and BOT Chair in signing the *Data Integrity Certification* without modification.

Background

State law¹ requires each of the twelve universities within the State University System (SUS) to conduct an annual audit to verify that data submitted pursuant to Sections 1001.7065 and 1001.92 of the Florida Statutes complies with BOG-defined data standards and is submitted to the BOG Office of Inspector General as part of the annual certification process.

In consultation with SUS institutions, the BOG developed a Performance-Based Funding (PBF) model and approved it in January 2014. The model includes ten metrics that evaluate Florida institutions on a range of issues. One of these metrics is a "choice metric" selected by each university's BOT. These metrics were chosen after reviewing more than forty metrics identified in the university's Work Plans.

The model has four guiding principles: 1) use metrics that align with SUS Strategic Plan goals, 2) reward Excellence or Improvement, 3) have a few clear, simple metrics, and 4) acknowledge the unique mission of the different institutions. The key components of the model are: 1) Institutions will be evaluated on either Excellence or Improvement for 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 determined after reviewing data trends for each metric, and 4) The Florida Legislature and Governor determine the amount of new state funding and an amount of institutional funding that would come from each university's recurring state base appropriation.²

¹ Section 1001.706(5)(e), Florida Statutes

² BOG Performance Funding Model Overview (June 2025)

FAU's 2025 Performance-Based Funding Metrics³

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)	8a.	Graduate Degrees within Programs of Strategic Emphasis
4.	Four-Year FTIC (First-Time- In-College) Graduation Rate	9a.	Three-Year Graduation Rate for Florida College System (FCS) Associate in Arts Transfer Students
		9b.	Six-Year Graduation Rate for Students Awarded a Pell Grant in Their First Year
5.	Academic Progress Rate (2 nd Year Retention with GPA above 2.0)	10b.	FAU Board of Trustees' Choice – Total Research Expenditures

State law⁴ governs the funding model under which state universities receive state funding. Since the implementation of the model, funding significantly increased during the first four years and then remained level for five years. The Legislature and Governor increased funding by \$85 million for the 2023-2024 fiscal year, and it has remained at that level for the past three years.⁵

Pursuant to BOG Regulation,⁶ the University President delegated the role of Institutional Data Administrator (DA) to the Assistant Provost for Institutional Effectiveness and Analysis (IEA). The DA ensures the completeness, accuracy, and timeliness of State University Database System (SUDS) files submitted to the BOG.

Data uploaded to SUDS undergo edit checks to verify compliance with BOG definitions. After IEA confirms that all errors are resolved, the DA submits the files according to the BOG's Due Date Master Calendar. Each submission includes an electronic certification affirming that the data represents FAU's official position for the reported term(s).

³ Performance-Based Funding 2025 Metric Definitions

⁴ Section 1001.92, Florida Statutes

⁵ BOG Metric Scores and Allocations June 2025

⁶ Chapter 3.007(2)

Objectives, Scope, and Methodology

The **objectives** of the audit were to:

- Evaluate the effectiveness of the University’s processes and internal controls to ensure the completeness, accuracy, and timeliness of data submissions to the Board of Governors (BOG), which support the University’s Performance-Based Funding (PBF) metrics; and
- Provide an objective basis of support for the University’s President and Board of Trustees (BOT) Chair to sign the *Data Integrity Certification*, which will be submitted to the BOG by March 1, 2026, after the report has been accepted by the University’s BOT.

The **scope** of the audit included data files submitted to the BOG between December 1, 2024, and November 30, 2025, for the following metrics:

- Metric 4: Four-Year FTIC Graduation Rate
- Metric 7: University Access Rate (Percent of Undergraduates with a Pell Grant)
- Metric 9a: Three-Year Graduation Rate for FCS Associate in Arts Transfer Students
- Metric 9b: Six-Year Graduation Rate for Students Awarded a Pell Grant in Their First Year

Based on the BOG’s assessment of audit risks for common PBF metrics, our approach is to test all PBF metrics on a three-year rotational cycle.

To achieve our objectives, we performed the following audit procedures:

- Reviewed audit reports on PBF data integrity issued by other SUS universities.
- Examined 2025 metric definitions and related documents for changes.
- Assessed key processes used by the Data Administrator (DA) and functional data owners to ensure data completeness, accuracy, and timeliness.
- Interviewed key personnel regarding data integrity and submission responsibilities.
- Reviewed the current list of users with access to the BOG State University Data System (SUDS) to confirm that account privileges align with job functions.
- Tested the accuracy of data files for PBF metrics 4, 7, 9a, and 9b submitted between December 1, 2024, and November 30, 2025. (See Appendix A for in-scope BOG data elements.)

As with all audits, this review did not include every record or transaction and cannot guarantee the detection of all control deficiencies, errors, or fraud.

We conducted this audit in accordance with the *Global Internal Audit Standards* and the *Principles and Standards for Offices of Inspector General*. These standards require planning and performing the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions. We believe the evidence obtained provides a sound basis for our observations and conclusions.

Observations and Conclusions

We concluded that the controls and processes established and implemented by FAU provide reasonable assurance of the completeness, accuracy, and timeliness of data submitted to the BOG for PBF decisions. **No reportable issues or material errors were identified that would affect FAU's overall ranking among State University System (SUS) institutions.** This audit supports the University's President and BOT Chair in signing the *Data Integrity Certification* without modification.

We noted the following good management practices and key controls implemented by the University, which contributed to the reliability and accuracy of the data submitted to the BOG:

- ✓ Data owners formally certify the completeness and accuracy of data before IEA's review, in accordance with established timelines.
- ✓ IEA maintains a secure repository of certifications, checklists, and validation procedures for each submission. All validation steps, approvals, and communications are retained for compliance and future audits. Access requires multi-factor authentication. A Data Quality Review Summary documents issues noted for each submission and serves as a reference for future cycles.
- ✓ IEA uses analytical tools—including automated Power BI dashboards and Structured Query Language (SQL) reports—to identify missing values or anomalies. Defined thresholds for variances are compared to prior-year data to detect significant shifts requiring investigation.
- ✓ The Data Administrator (DA) fosters collaboration through bi-weekly meetings with data owners. Meeting notes and action items are documented to ensure follow-up and maintain an audit trail. The DA also promotes data stewardship by resolving issues and improving data quality.
- ✓ FAU security managers grant SUDS access only when tickets submitted through TeamDynamix are approved by the employee's supervisor. Access rights are periodically reviewed for appropriateness.
- ✓ An encrypted shared drive is used by data owners and OIT staff to store quality control documentation, including narratives, reports, and communications. Access is restricted and periodically monitored to ensure appropriate privileges.
- ✓ Data owners run monitoring reports throughout the year to track known issues and collaborate with OIT to create additional reports or modify existing ones to prevent errors. Results are documented and retained for future reference.
- ✓ Change management procedures require testing by data owners to ensure changes produce the intended results, along with documented approval prior to implementing programming code changes. If a change affects the file build or its data, it is logged, and an updated SQL report for each change is attached to the log for future reference. Change logs are periodically reviewed for completeness and accuracy.
- ✓ Controls and processes are reviewed annually to incorporate lessons learned and address regulatory changes.
- ✓ Ongoing training on data integrity and security is provided to data owners and staff.
- ✓ Periodic risk assessments of data submission processes are conducted to identify potential vulnerabilities.

We commend University management for implementing strong controls and processes to ensure the integrity of data submitted to the BOG.

Provost/VP Response

Dr. Ken Dawson-Scully, Provost and Executive Vice President for Academic Affairs

In response to the recent audit of the University Performance-Based Funding Data Integrity FY2026 (Report No. FY26-A-02), our Office of Institutional Effectiveness and Analysis has established strong controls and processes that have been implemented in cooperation with the supporting units. This is evident in this audit report, which contains no findings and no recommendations.

Engagement Team

Audit Conducted by: Allaire Vroman, Internal Auditor/Investigator

Audit supervised and approved by: Reuben Iyamu, MBA, CIA, CFE, CIGA, CIG
FAU Inspector General

Please address inquiries regarding this report to: Reuben Iyamu, FAU Inspector General, by email at riyamu@fau.edu or by phone at 561-297-6493.

APPENDIX A – IN-SCOPE BOG DATA ELEMENTS

No.	Metric	Definition	Submission/Table/Elements Information	Relevant Submissions
4	Four-Year FTIC (First-Time-In-College) Graduation Rate	This metric is based on the percentage of first-time-in-college (FTIC) students who started in the Fall (or summer continuing to Fall) term and were enrolled full-time in their first semester and had graduated from the same institution by the summer term of their fourth year. FTIC includes ‘early admit’ students who were admitted as a degree-seeking student prior to high school graduation. Students who were enrolled in advanced graduate programs during their 4th year were excluded.	<p>Submission: SIF Table: Enrollments Elements: 01107 – Fee Classification – Kind 01067 – Last Institution Code 01068 – Type of Student at Date of Entry 01413 – Type of Student at Time of Most Recent Admission 01420 – Date of Most Recent Admission 01060 – Student Classification Level 01112 – Degree – Highest Level Held 01063 – Current Term Course Load 01095 – University Identifier</p> <p>Submission: SIFD Table: Degrees Awarded Elements: 01412 – Term Degree Granted 01081 – Degree – Level Granted 01095 – University Identifier</p> <p>Submission: RET Table: Ret_Cohort_Chgs Elements: 02001 – Reporting Time Frame 01429 – Cohort Type 01465 – Student Right to Know (SRK) Flag-New 01442 – Cohort Adjustment Flag 01458 – FTIC Full-Time Indicator-Entering Term 01095 – University Identifier</p>	<p>Fall 2024</p> <p>Fall 2024 Spring 2025 Summer 2025</p> <p>Annual 2023-2024</p>
7	University Access Rate (Percent of Undergraduates with a Pell Grant)	This metric is based on the number of undergraduates, enrolled during the fall term, who received a Pell-grant during the fall term. Students who were not eligible for Pell-grants (e.g., Unclassified, non-resident aliens, post-baccalaureate students) were excluded from the denominator for this metric.	<p>Submission: SIF Table: Enrollments Elements: 02041 – Demo Time Frame 01107 – Fee Classification – Kind 01413 – Type of Student at Time of Most Recent Admission 01060 – Student Classification Level 01095 – University Identifier</p> <p>Table: Person Demo Elements: 02041 – Demo Time Frame 02043 – Non-resident Alien Flag 01095 – University Identifier</p>	<p>Fall 2024</p>

			Submission: SFA Table: Financial Aid Awards Elements: 02001 – Reporting Time Frame 02040 – Award Payment Term 01253 – Financial Aid Award Program Identifier 01095 – University Identifier	Annual 2024-2025
9a	Three-Year Graduation Rate for Florida College System (FCS) Associate in Arts Transfer Students	This transfer cohort is defined as undergraduates entering in fall term (or summer continuing to fall) from the Florida College System with an Associate in Arts (AA) degree. The rate is the percentage of the initial cohort that has either graduated from the same institution by the summer term of their third academic year. Both full-time and part-time students are used in the calculation. Students who were flagged as enrolled in advanced graduate programs that would not earn a bachelor’s degree are excluded.	Same as No. 4 above.	Same as No. 4 above.
9b	Six-Year Graduation Rate for Students Awarded a Pell Grant in Their First Year	This metric is based on the percentage of students who started in the Fall (or summer continuing to Fall) term and were enrolled full-time or part-time in their first semester and who received a Pell Grant during their first year and who graduated from the same institution by the summer term of their sixth year. Students who were flagged as enrolled in advanced graduate programs that would not earn a bachelor’s degree were excluded.	Same as No. 4 above, plus: Submission: SFA Table: Financial Aid Awards Elements: 02001 – Reporting Time Frame 02040 – Award Payment Term 01253 – Financial Aid Award Program Identifier 01095 – University Identifier	Same as No. 4 above, plus: Annual 2024-2025