Florida Gulf Coast University

Performance Based Funding Data Integrity

Internal Audit Report

Report Date: January 26, 2026

PERFORMANCE BASED FUNDING DATA INTEGRITY AUDIT

EXECUTIVE SUMMARY

At the direction of the Florida Board of Governors (BOG), audit procedures were performed to determine whether Florida Gulf Coast University (University) has effective internal controls, processes and procedures in place to ensure the completeness, accuracy, and timeliness of the data submissions to the BOG which support the University's Performance Based Funding Metrics.

Audit procedures included, but were not limited to, the evaluation of internal controls, processes, and procedures established to ensure the completeness and accuracy of data submissions to the Board of Governors, which support performance measures funding. Additionally, limited testing with a confidence level of 95% was performed of data elements comprising the Student Instruction File (SIF), Degree Awarded (SIFD), Student Financial Aid (SFA), and Retention (RET) data submissions which are used in computations for Metrics 1, 2, 4, 7 of the BOG performance based funding model.

Overall, our audit indicates that there are no significant deficiencies in the processes implemented by the University that relate to the integrity of data that supports the performance based funding model. The data testing provides reasonable assurance that the data submitted to the Board of Governors is complete, accurate and timely.

We wish to express our appreciation to the Data Administrator and the Office of Institutional Research and Data Analytics (Institutional Research) staff for their continued cooperation and assistance. Their knowledge was instrumental in the successful completion of the audit. Internal Audit would like to thank Institutional Research for all their help in demonstrating continuous improvement with this process.

This audit was conducted in accordance with the Global Internal Audit Standards, issued by the Institute of Internal Auditors. The audit procedures provided a reasonable basis for our opinion.

OBJECTIVES

A. Determine whether there are effective internal controls, processes, and procedures to ensure the completeness, and accuracy and timeliness of data submissions to the Board of Governors, which support performance measures funding.

B. Provide a reasonable basis of support for the President and Florida Gulf Coast University Board of Trustees (BOT) Chair to sign the representations included in the Performance Based Funding Data Integrity Certification, which will be submitted to the BOT and filed with the Board of Governors by March 1, 2026.

AUDIT SCOPE – End of Fieldwork was January 26, 2026.

- Review of Sections 1001.706 and 1001.92, Florida Statutes.

- Review of Board of Governors Regulations 1001(3)(f), 3.007 and 5.001.

- Review of applicable policies, procedures and control processes related to data submissions associated with performance data metrics.

- Review samples of relevant data submissions from October 1, 2024 to September 30, 2025. See Appendix A for the list of required submissions that relate to performance metrics during the audited time period.

- Detailed sample testing of data elements in the submissions submitted to the BOG was limited to the submissions files that support metrics 1, 2, 4 and 7. See Appendix B for metric definitions with supporting submissions and table elements for the tested metrics.

- Test of completeness of Pell grants, admitted students, degrees awarded and enrollment.

BACKGROUND

The BOG has broad governance responsibilities that affect administrative and budgetary matters for Florida's public universities. Beginning in fiscal year 2013-2014, the BOG instituted the Performance Funding Model which is based on ten performance metrics used to evaluate the institutions on a range of issues.

The 2024-2025 metrics are as follows:

1. Percent of Bachelor's Graduates Enrolled or Employed ($40,000+), One Year After Graduation
2. Median Wages of Bachelor's Graduates Employed Full-time, One Year After Graduation
3. Cost to the Student, Net Tuition & Fees for Resident Undergraduates per 120 Credit Hours
4. Four Year FTIC Graduation Rate
5. Academic Progress Rate, 2nd Year Retention with GPA Above 2.0
6. Bachelor's Degrees within Programs of Strategic Emphasis
7. University Access Rate, Percent of Undergraduates with a Pell-grant
8. Graduate Degrees within Programs of Strategic Emphasis
9. a. Three-Year Graduation Rate for FCS Associate in Arts Transfer Student
   b. Six-Year Graduation Rate for Students who are Awarded a Pell Grant in their First Year (BOG Choice Metric)
10. Number of Bachelor's Degrees Awarded to Hispanic and African-American Students (BOT Choice Metric)

According to information published by the BOG in June 2025, the following are key components of the funding model:

- Institutions are evaluated on either Excellence or Improvement for each metric.
- Data is based on one-year data.
- The benchmarks for Excellence are 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.
- The Florida Legislature and Governor determine the amount of new state funding and an amount of institutional funding that will come from each university's recurring state base appropriation.

The amount of the state investment appropriated by the Legislature and Governor for performance funding will be augmented by an amount reallocated from the university system base budget. These "institutional base" funds are in turn, the cumulative recurring state appropriations the Legislature has appropriated to the BOG, and then from the BOG to each institution.

The highest point value for each metric is 10 points, with the exception of metric 9a. and 9b which have a highest point value of 5 points each. All 10 of the metrics have equal weight. There is a maximum of 100 possible points.

PBF Points	Plans	State Investment	Institutional Investment
70 and above	Student Success *(applies only if there are two flat or declining years)*	Eligible 100%	Eligible 100%
60–69	Student Success	Eligible 50%	Eligible 100%
Below 60	Improvement	Eligible 50%	Eligible 100% *(one time only)*

The BOG maintains a student unit record database titled the State University Database System (SUDS). This database contains over 400 data elements about students, faculty and programs at State University System (SUS) institutions. SUDS is part of a web-based portal developed by the BOG for the SUS to report data, and has centralized security protocols for access, data encryption, and password controls. Initial input of data files supporting Performance Based Funding (PBF) metrics is the responsibility of the University's Data Administrator in Institutional Research, and is scheduled to be uploaded to SUDS based on the BOG's Due Date Master Calendar. Data uploaded to SUDS are subject to edit checks to help ensure consistency with BOG-defined data elements, and accuracy of the information submitted. Once Institutional Research is satisfied that any edit errors have been fully addressed, Institutional Research makes an official submission of data files to the BOG. This process is depicted further in Appendix C.

Each file submission by Institutional Research includes an electronic certification in which the University's Data Administrator certifies that the data represents the University for the term(s) being reported as required by BOG Regulation 3.007.

AUDIT PROCEDURES

Audit procedures were conducted to address the Data Integrity Certification Representations provided by the BOG. These procedures included, but were not limited to:

- Identifying and evaluating key processes used by the Data Administrator and applicable University departments responsible for the data to ensure the completeness, accuracy, and timeliness of data submissions to the BOG.

- Interviewing key personnel responsible for the data being reported and submitted to the BOG. Reviewing key internal controls and processes in place over data input, Banner access, 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.

- Verifying the accuracy of the data submitted to the BOG for Metric 1, Percent of Bachelor's Graduates Enrolled or Employed ($40,000+) One Year After Graduation; Metric 2, Median Wages of Bachelor's Graduates Employed Full-time; Metric 4, Four Year FTIC Graduation Rate; and Metric 7, University Access Rate Percentage of Undergraduates with a Pell-grant

- Verifying the completeness of data files submitted for Pell grants, admitted students, degrees awarded and enrolled students.

- Testing for 1, 2, 4, and 7 included data from 8 of 13 submissions during the audit period.

Submission Name	Table	Frequency of Submission	Number of Elements Tested	Sample Items	Total Elements Tested for this Submission
Student Instruction File (SIF)	Enrollments	Fall, Spring, Summer	11	180	1,980
Student Instruction File (SIF)	Person Demo	Fall, Spring, Summer	3	180	540
Student Financial Aid (SFA)	Financial Aid Awards	Annual	5	60	300
Degrees Awarded (SIFD)	Degrees Awarded	Fall, Spring, Summer	5	180	900
Retention (RET)	Cohort Changes	Annual	6	23*	138
Total	—	—	—	—	3,858

*Size of population was a total of 23

- This corresponded to a 95% confidence level for our testing. During the prior year, we tested the data submissions for a different group of Metrics (3, 4, 5, 9a, and 9b), and each year, we select a different set of Metrics to test based on our annual risk assessment.

- Reviewing 2024-25 SUDS plan, metric definitions, and other key Performance Based Funding documents.

- Verifying submission files tested were submitted by the due date as identified on the SUDS website.

- Reviewing controls related to the access and provisioning of users associated with the SUDS System. This included reviewing the current processes utilized to grant and remove access in addition to reviewing the access controls surrounding the authorization of users logging in to the system. Furthermore, IA reviewed a current listing of all those individuals who have access to the SUDS system for appropriateness of access to the BOG's application portal.

- Reviewing current change management processes utilized for the correction of data and modification of code utilized to pull current data for the Performance Based Funding Metrics.

- Reviewing Banner access and termination procedures and quarterly Banner security reviews to determine whether controls are in place regarding access to Banner.

CONCLUSION

In our opinion, based upon the work performed, the internal controls, processes and procedures in place to ensure the completeness, accuracy, and overall timeliness of data submissions that affect performance-based funding metrics are operating effectively.

We believe our audit can be relied upon by the President and the Florida Gulf Coast University Board of Trustees as a basis for certifying representations to the Board of Governors related to the integrity of data required for its Performance Based Funding Model.

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Audit Supervised and Reviewed by: William Foster, MBA, CPA, CIA, CGAP, CFE, CRMA, CCSA, CISA, COSO FRM Director, Internal Audit

APPENDIX A
METRIC RELATED SUBMISSIONS

Due Date	Submission	Term or Year	Report Time Frame
10/3/2024	Degrees Awarded (SIFD)	Summer 2024	202405
10/4/2024	Student Financial Aid (SFA)	Annual 2023	20232024
10/23/2024	Admissions (ADM)	Fall 2024	202408
11/1/2024	Student Instruction File Preliminary (SIFP)	Fall 2024	202408
11/15/2024	Hours to Degree (HTD)	Annual 2023	20232024
1/17/2025	Student Instruction File (SIF)	Fall 2024	202408
1/24/2025	Degrees Awarded (SIFD)	Fall 2024	202408
1/31/2025	Retention (RET)	Annual 2023	20232024
3/7/2025	Admissions (ADM)	Spring 2025	202501
6/20/2025	Student Instruction File (SIF)	Spring 2025	202501
7/11/2025	Degrees Awarded (SIFD)	Spring 2025	202501
9/5/2025	Admissions (ADM)	Summer 2025	202505
9/26/2025	Student Instruction File (SIF)	Summer 2025	202505

METRIC DEFINITIONS WITH SUPPORTING SUBMISSIONS AND TABLE ELEMENTS

Metric: 1. Percent of Bachelor's Graduates Enrolled or Employed ($40,000+) One Year After Graduation

Definition
This metric is based on the percentage of a graduating class of bachelor's degree recipients who are enrolled or employed (earning at least $40,000) somewhere in the United States. This dataset includes non-Florida data from all U.S. states and districts, including Washington D.C. and Puerto Rico, as well as military enlistment reported by institutions. Students without valid social security numbers who are not found enrolled are excluded. Students not found enrolled and/or not found employed are also excluded.

Sources: State University Database System (SUDS); Florida Department of Economic Opportunity (DEO) analysis of State Wage Interchange System (SWIS); National Student Clearinghouse (NSC).

Submissions and Table Elements

Submission: SIFD
Table: Degrees Awarded
• 01081 – Degree-Level Granted
• 01045 – Reporting Institution
• 01412 – Term Degree Granted
• 02001 – Reporting Time Frame

Metric: 2. Median Wages of Bachelor's Graduates Employed Full-time One Year After Graduation

Definition
This metric uses annualized Unemployment Insurance (UI) wage data from the fourth fiscal quarter after graduation for bachelor's degree recipients. Excluded are individuals who are self-employed, employed by the military, without a valid social security number, or making less than minimum wage. This dataset includes non-Florida UI wage data from all states and districts, including Washington D.C. and Puerto Rico.

Sources: State University Database System (SUDS); Florida Department of Economic Opportunity (DEO) analysis of SWIS.

Submissions and Table Elements

Submission: SIFD
Table: Degrees Awarded
• 01081 – Degree-Level Granted
• 01045 – Reporting Institution
• 01412 – Term Degree Granted
• 02001 – Reporting Time Frame

Metric: 4. Four-Year FTIC Graduation Rate

Definition
This metric is based on the percentage of first-time-in-college (FTIC) students who entered in the fall term (or summer continuing to fall), were enrolled full-time in their first semester, and graduated from the same institution by the summer term of their fourth year. FTIC includes early admits enrolled before high school graduation. Students enrolled in advanced graduate programs during year four are excluded.

Source: State University Database System (SUDS

Submissions and Table Elements

Submission: SIF
Table: Enrollments
• 01063 – Current Term Course Load
• 01067 – Last Institution Code
• 01068 – Type of Student at Date of Entry
• 01060 – Student Classification Level
• 01112 – Degree – Highest Level Held
• 01107 – Fee Classification – Kind
• 01420 – Date of Most Recent Admission
• 01413 – Type of Student at Time of Most Recent Admission
• 01411 – Institution Granting Highest Degree
• 01095 – University Identifier

Submission: SIFD
Table: Degrees Awarded
• 01081 – Degree-Level Granted
• 01412 – Term Degree Granted
• 01095 – University Identifier

Submission: RET
Table: Ret_Cohort_Chgs
• 01429 – Cohort Type
• 01465 – Student-Right-to-Know (SRK) Flag
• 01442 – Cohort Adjustment Flag
• 01095 – University Identifier

• 02001 – Reporting Time Frame
• 01458 – FTIC Full-Time Indicator – Entering Term

Metric: 7. University Access Rate (Percent of Undergraduates with a Pell Grant)

Definition
This metric measures the number of undergraduates enrolled during the fall term who received a Pell Grant during the fall term. Students not eligible for Pell (including unclassified students, non-resident aliens, and post-baccalaureate students) are excluded from the denominator.

Source: State University Database System (SUDS).

Submissions and Table Elements

Submission: SIF
Table: Enrollments
• 01060 – Student Classification Level
• 01107 – Fee Classification – Kind
• 02041 – Demo Time Frame
• 01413 – Type of Student at Time of Most Recent Admission
• 01095 – University Identifier

Submission: SIF
Table: Person Demo
• 02043 – Non-resident Alien Flag
• 02041 – Demo Time Frame
• 01095 – University Identifier

Submission: SFA
Table: Financial Aid Awards
• 02001 – Reporting Time Frame
• 01253 – Financial Aid Award Program Identifier
• 02040 – Award Payment Term
• 02001 – Reporting Time Frame (duplicate in source)
• 01095 – University Identifier

Overview of the University SUDS Submission Data & Process Flows