Office of the President
Office of Internal Audit

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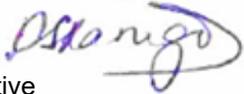PO Box 113025
Gainesville, FL 32601-3025
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October 21, 2025

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 Internal 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 data submissions from October 1, 2024, to September 30, 2025, and was undertaken to comply with Florida's statutory 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, 2025. The background, objectives and scope of the internal audit, conclusion and overall report rating are included on pages one to three of the attached report.

We conducted the audit in accordance with the mandatory elements of the International Professional Practices Framework, which are the Global Internal Audit Standards and topical requirements 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 course of 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:wj

cc: Donald Landry, Interim President
       Joseph Glover, Interim Provost and Executive Vice President for Academic Affairs
       Ryan Fuller, Vice President and General Counsel
       Cathy Lebo, Associate Provost and Director, Institutional Planning and Research
       Auditor General

UNIVERSITY OF FLORIDA

OFFICE OF INTERNAL AUDIT

PERFORMANCE-BASED FUNDING AND
PREEMINENCE METRICS – DATA INTEGRITY

Report Issue Date: October 21, 2025

Report Number: 26-884-22

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

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AUDIT REPORT

INTERNAL AUDIT PERSONNEL

Audit conducted by: Sam Rovelstad, Internal Auditor
                           Ruijun Wan, Internal Auditor

Audit supervised by: Lily Ly, Audit Manager

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PERFORMANCE-BASED FUNDING AND
PREEMINENCE METRICS – DATA INTEGRITY

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Background

Florida Statutes 1001.92 and 1001.7065 promulgate the establishment of the funding for the State University System (SUS) Performance-based Incentive ("performance-based funding" or "PBF") and the Preeminent State Research Universities Program. Florida Statute 1001.706(5)(e) requires the SUS 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. For the 2025-2026 fiscal year, the University of Florida was allocated approximately $133.9M in PBF-related funding, including allocation of State Investment ($71.6M) Institutional Investment ($60.3M), and an additional Top 3 State Investment ($2M).

Similarly, the Preeminent State Research Universities program was established to award those universities that demonstrate high performance toward academic and research excellence. An SUS university must meet or exceed the benchmarks to earn the preeminence designation. UF has achieved preeminence designation since the inception of the program in 2013. For the 2025-2026 fiscal year, the State of Florida allocated $40M to distribute to preeminent universities within the SUS, of which UF received $10M.

The BOG maintains a web-based State University Database System (SUDS) to allow data administrators (DA) to submit data on behalf of their universities. 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 associate provost and director of Institutional Planning and Research (IPR) as the DA for UF 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 2025 Accountability Plan and the data submissions used to support the metrics.

Objectives and Scope

Florida Statutes 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 statutory 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, 2025.
- Provide an objective basis of support for the university president and the university Board of Trustees (BOT) chair to sign the Data Integrity Certification Form (Attachment B).

We performed our fieldwork from August 20, 2025, through October 9, 2025, and covered the submissions from October 1, 2024, through September 30, 2025. 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 some 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 twelfth 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 unit-level staffing changes, changes in reporting requirements from the prior year, variances in the data reported, and the scores reported.

Since the implementation of the student information system, PeopleSoft's Campus Solutions (CS), in Fall 2018, and the admissions system, SLATE (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 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 data owners and the required IT controls
- Independent testing and validation of the data submission to source records
- Timeliness of submissions and assessing business reasons for any resubmissions

In addition to the detailed review of procedures at IPR and University of Florida Information Technology (UFIT), a summary of the applicable submissions and data owners is presented with each metric in Attachment A, including the four metrics selected for data validation.

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 that are 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 trends that would require further research.
- 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, IPR, 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, it is logged. Updated Structured Query Language (SQL) for each change is attached to the log for future reference.

Overall Conclusion

We noted that the submissions during the current period were generally timely. 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 reasonable 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.

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.

2025 Performance Based Funding Metrics

Metrics selected for data validation are highlighted below.

#	Description	Data Files	Data Owners	Excellence[1] Data	Points	Improvement[2] Data	Points	Final Score[3]
1	Percent of Bachelor's Graduates Enrolled or Employed (earning $40,000+) *One year after graduation*	SIFD	Registrar	79.4%	9	0.4%	0	9
2	Median Wages of Bachelor's Graduates Employed Full-Time *One year after graduation*	SIFD	Registrar	$58,200	10	3.0%	6	10
3	Average Cost to the Student Net Tuition & Fees per 120 Credit Hours	SIF HTD SFA	Student Financial Aid & Scholarships, Registrar, Bursar	($5,820)	10	(33%)	10	10
4	Four Year Graduation Rate *Full-time First Time in College*	SIF SIFD RET	Registrar	78%	10	1.1%	2	10
5	Academic Progress Rate *2nd Year Retention with GPA 2.0 or above*	SIF SIFD RET	Registrar	96.9%	10	0.7%	1	10
6	Bachelor's Degrees Awarded within Programs of Strategic Emphasis *(includes STEM)*	SIFD	Registrar	59.8%	10	0.3%	0	10
7	University Access Rate *Percent of Undergraduates with a Pell Grant*	SIF SFA	Registrar, Student Financial Aid & Scholarships	23.2%	5	0%	0	5
8a	Graduate Degrees Awarded within Programs of Strategic Emphasis *(includes STEM)*	SIFD	Registrar	70.2%	10	1.4%	2	10
9a	Three-Year Graduation Rate for Florida College System Associate in Arts Transfer Student	SIF SIFD RET	Registrar	72.2%	5	1.8%	1	5
9b	Six-Year Graduation Rate for First Time in College Students who are Awarded a Pell Grant in their First Year	SIF SIFD RET SFA	Registrar, Student Financial Aid & Scholarships	86.4%	5	1.1%	1	5
10[5]	BOT Choice: Endowment Size ($M)		Advancement	$2,454	9	5%	10	10
							Final Score Total[4]	**94**

[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 2025, all scores are based on Excellence Points except for metric 10.

[5] Metric 10 is institution specific and left to the Board of Trustees to select.

Preeminence Metrics

Metric	Description	Source	Data Owner	2025
1a	**Average High School GPA** *an average weighted grade point average of <u>4.0 or higher</u> for incoming freshman in Fall semester*	SUDS*	Admissions	4.6
1b	**Average SAT Score** *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.*	SUDS*	Admissions	1,408
2	**Public University National Ranking** *A top-50 ranking on <u>at least two</u> well-known and highly respected national public university rankings*	Various**	N/A	7
3	**Freshman Retention Rate** *<u>90 percent or higher</u> for full-time, first-time-in-college students*	SUDS*	Registrar	97%
4	**Four-Year Graduation Rate** *<u>60 percent or higher</u> for full-time, first-time-in-college students*	SUDS*	Registrar	78%
5	**National Academy Membership** *<u>Six or more</u> faculty members at the state university who are members of a national academy*	Academy Directory**	N/A	34
6	**Total Annual Research Expenditures ($M)** *Total annual research expenditures, including federal research expenditures, <u>of $200 million or more</u>*	National Science Foundation**	Research and Cost Analysis	$1,272
7	**Total Annual Research Expenditures in Non-Medical Science and Engineering ($M)** *Total annual research expenditures in diversified non-medical sciences <u>of $150 million or more</u>*	National Science Foundation**	Research and Cost Analysis	$751
8	**National Ranking in Research Expenditures** *A top-100 university national ranking for research expenditures in <u>five or more</u> disciplines within computer science, engineering, environmental science, life science, mathematical sciences, physical sciences, psychology, and social sciences*	National Science Foundation**	Research and Cost Analysis	8 of 8
9	**Utility Patents Awarded** *<u>One hundred or more</u> total patents awarded by the United States Patent and Trademark Office for the most recent 3-year period*	US Patent Office**	Technology Licensing	396
10	**Doctoral Degrees Awarded** *<u>Four hundred or more</u> doctoral degrees awarded annually*	SUDS*	Registrar	1,600
11	**Number of Post-Doctoral Appointees** *<u>Two hundred or more</u> post-doctoral appointees annually*	National Science Foundation**	Human Resources	772
12	**Endowment Size ($M)** *An endowment of <u>$500 million or more</u>*	NACUBO**	UF Foundation	$2,454
13	**Science & Engineering Research Expenditures ($M)** *Total annual STEM-related research expenditures, including federal research expenditures, <u>of $50 million or more</u>.*	National Science Foundation**	Research and Cost Analysis	$1,215

* The SUDS file submissions are ADM, SIF, SIFD, and RET
** BOG obtains data from external agencies

Data Integrity Certification
March 2026

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 that 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 that 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 1001.706(5)(e), 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 **close of business on March 1, 2026**.

University Name: Click or tap here to enter text.

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 2026

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: Click or tap here to enter text.

Data Integrity Certification, March 2026

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: _____   Date: _____
                        University President

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: _____   Date: _____
                        University Board of Trustees Chair

APPENDIX

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.

CRITERIA FOR ASSIGNING PRIORITY LEVELS TO INTERNAL AUDIT OBSERVATIONS	
PRIORITY LEVEL	**DESCRIPTION**
HIGH	Observations addressing control matters for which action is essential for maintaining a strong control environment. These recommendations should be remedied within six months.
MODERATE	Observations addressing control matters that are important, but where other compensating controls exist. Thus, the adoption of these recommendations would either (a) improve management's control of the business or (b) improve the efficiency of existing controls. The recommendations should be addressed reasonably promptly.
LOW	Observations addressing situations where controls do not meet good practice standards or are inefficient. Adopting these recommendations would, therefore, enhance the control framework and/or efficiency of operations. The recommendations should be managed through routine procedures.

Note: *The overall ratings and observation priorities represent a conclusion on the adequacy or effectiveness of internal controls for the processes reviewed. They are based on the estimated impact on the unit/process under review rather than to the university as a whole.*

RISK CRITERIA

RISK MATRIX			
IMPACT / LIKELIHOOD	LOW	MODERATE	HIGH
HIGH	Low	Moderate	High
MODERATE	Low	Moderate	Moderate
LOW	Low	Low	Low

LIKELIHOOD CRITERIA	
RATING	DESCRIPTION
HIGH	Likely to occur within the next six months
MODERATE	Likely to occur within the next year (12 months)
LOW	May occur in the future in exceptional circumstances

IMPACT CRITERIA			
RISK CATEGORIES	**LOW** ‣ *Event with consequences that can be readily absorbed.* ‣ *Existing controls & procedures should cope with event or circumstance*	**MEDIUM** ‣ *Significant event or circumstance that can be managed under normal conditions*	**HIGH** ‣ *Critical event or circumstance with potentially disastrous impact without proper management*
STRATEGIC	‣ Minor impact on the university's ability to achieve strategic objectives	‣ Moderate impact on the university's ability to achieve strategic objectives	‣ Significant impact on the university's ability to achieve strategic objectives
FINANCIAL	‣ >$100K but <$500K impact on Net Position ‣ Internal Control deficiency ‣ Minimum impact on donor support	‣ >$500K but <$2M impact on Net Position ‣ Significant internal control deficiency ‣ Withdrawal of donor support or failure to meet development goals	‣ >$2M impact on Net Position ‣ Multiple material weaknesses ‣ Significant loss of donor support that could impact academic programs

IMPACT CRITERIA			
RISK CATEGORIES	**LOW** ▸ *Event with consequences that can be readily absorbed.* ▸ *Existing controls & procedures should cope with event or circumstance*	**MEDIUM** ▸ *Significant event or circumstance that can be managed under normal conditions*	**HIGH** ▸ *Critical event or circumstance with potentially disastrous impact without proper management*
REPUTATIONAL	▸ No report to stakeholders	▸ Awareness by stakeholders (e.g., students, alumni, donors)	▸ Press coverage (e.g., newspaper, TV) ▸ Attention/Concern from the public, national media, or Board (Trustees, Governors)
OPERATIONAL	▸ Small impact felt to a single area of the university's operations. ▸ Management (Chair/Director level) intervention may be required. ▸ <5% decline in enrollment	▸ Impact felt in multiple areas of the university's operations. ▸ Substantial management (Dean/Vice President level) involvement required. ▸ >5% but <10% decline in enrollment	▸ Significant impact felt throughout the university. ▸ Cabinet-level executive management and potentially Board level involvement required. ▸ > 10% decline in enrollment
LEGAL, COMPLIANCE, AND REGULATORY	▸ Low-level legal issue ▸ Minor noncompliance with contract/standards	▸ Multiple noncompliance with contract/standards ▸ Corrective action request	▸ Regulatory sanctions/punitive fines ▸ Litigation and potential large legal settlement/liability ▸ Enforcement action; major noncompliance with contract/standards ▸ Loss of accreditation