



INTERNAL AUDIT REPORT

Performance Based Funding Data Integrity Audit #2026.01

February 5, 2026

ISSUED TO:

Audit and Compliance Committee:

Nik Patel, Jill Davis, John Gol, Andrew Hudson, Steve Moore, Dan Skinner

Moez Limayem, President

Karen Patterson, Provost and Vice President for Academic and Student Affairs

Abby Willcox, Associate Vice President of Institutional Research and Performance

ISSUED BY:

Julia Hann, Chief Audit Executive

AUDITORS:

Brandon Bergman, Assistant Director

Jillian Litchfield, Assistant Director



EXECUTIVE SUMMARY

In accordance with Section 1001.92 of the Florida Statutes, the Board of Governors (BOG) has implemented a Performance-Based Funding (PBF) model designed to enhance the strategic plans, goals, and annual accountability reports of the State University System of Florida (SUS). This model aims to elevate the SUS while recognizing the unique missions of each university.

The accuracy and reliability of data submitted by universities are crucial for the BOG’s decision-making process. To ensure data integrity, the BOG introduced a *Data Integrity Certification Form* in 2014. This form, approved by each university’s Board of Trustees (BOT) and signed by the university president and board chairman, certifies the accuracy and completeness of the data submitted for PBF.

On June 23, 2025, the Inspector General and Director of Compliance of the BOG notified each university’s BOT that, *“As required by Florida Statutes¹, university boards of trustees shall direct the university chief audit executive to perform or cause to have performed by an independent audit firm, an audit of the university’s processes that ensure the completeness, accuracy, and timeliness of data submissions”* to the BOG. This audit provides an objective basis for the president and BOT chair to certify the required representations.

The Office of Internal Auditing (OIA) has completed the twelfth iteration of the Performance-Based Funding Data Integrity audit to support the data certification representation. The primary objective of this audit was to determine the adequacy of university controls which support the PBF metrics. This audit focused on the following data submission files:

- Student Instruction File – Degrees Awarded (SIFD)
- Student Instruction File (SIF)
- Student Financial Aid (SFA)
- Hours to Degree (HTD)
- Retention (RET)

The audit was conducted in accordance with professional internal auditing standards and submitted to the BOG with University of North Florida (UNF) Board of Trustee Audit and Compliance committee approval. The audit results form the basis for the certification by the UNF president and chairman.

¹ Florida Statutes, sections 1001.7065, *Preeminent State Research Universities Program*, and 1001.92, *State University System Performance-based Incentive*

Overall, the audit procedures concluded that the University's data submission processes have generally adequate controls to ensure the completeness, accuracy, and timeliness of data for the PBF metrics. We learned during calendar year 2025 there were two resubmissions of data files which did not impact the University's metric scoring calculation; specifically, the student instruction file (SIF) and the hours to degree (HTD) files had resubmissions.

Additionally, the University's Data Administrator and their team maintained regular contact with the SUS Office of Data & Analytics and Chief Data Officer, reinforcing the accuracy of submission files.

We have categorized the overall residual risk as low. The Internal Audit team would like to commend the staff involved in the audit for their knowledge, responsiveness, and patience throughout the review. Their cooperation was greatly appreciated.



OBJECTIVES, SCOPE, AND METHODOLOGY

OBJECTIVES

The objectives of the audit were to:

- Determine whether the University has adequate controls in place to ensure the completeness, accuracy, and timeliness of data submissions to the BOG, which supports the Performance Based Funding metrics.
- Provide an objective basis of support for the president and Board of Trustees chair to sign the required representations in the Performance Based Funding - Data Integrity Certification which will be filed with the BOG on or before March 1, 2026.
- Follow-up on the implementation of corrective action plans reported in the prior audit.

SCOPE AND METHODOLOGY

The scope of this audit included data submitted to the BOG from January 16, 2025 (the date of our last audit) through January 16, 2026. To achieve our objectives, we performed the following activities:

- Verified that the president has appointed an institutional data administrator.
- Reviewed metric definitions, benchmarks, and other key documents to identify any changes to the BOG PBF metrics and data definitions.
- Identified any material changes to key processes used by the data administrator and/or functional data owners to ensure the completeness, accuracy, and timeliness of data submissions to the BOG.
- Ensured the timely submission of data submission files to the BOG as outlined on the SUS Due Date Master Calendar for the 2025 calendar year.
- Reviewed the data administrator's data resubmissions to the BOG for the 2025 calendar year to ensure these resubmissions were necessary, authorized, and included actions to prevent future occurrences.
- Performed data analysis and/or record sample tracing student records to data submission file types used for performance-based funding metrics.

We conducted employee interviews, analytical reviews, process walkthroughs, and evaluated risks in the processes and their impact on metrics.

Audit fieldwork began October 31, 2025, and concluded on January 16, 2026. The audit was conducted in accordance with International Standards for the Professional Practice of Internal Auditing published by the Institute of Internal Auditors (IIA). We relied on UNF Policies and Regulations, State of Florida Board of Governors Regulations, and best business practices to support strong internal control.

PRIOR AUDIT RECOMMENDATIONS

Our examination generally includes a follow-up on observations and recommendations of prior internal audits, where the subjects of such findings are applicable to the scope of the current audit being performed. There were no reportable outstanding issues from the prior audits that required additional follow-up during this audit engagement.



RISK RANKING APPENDIX

Risk Rating	# of Issues Identified	Risk Description
Critical	0	Material risks to the university were identified, including critical internal control failures stemming from significant violations of policies, procedures, or laws, and potential fraud, waste, or abuse. Immediate corrective action is required to address these high-risk issues.
Notable	0	Significant issues were identified, including multiple violations of policies and procedures, and weak internal controls. Corrective action is required to improve effectiveness, efficiency, and control processes.
Minor	0	Nominal risks were identified due to minor violations of procedures, rules, or regulations and weaknesses in internal controls. Recommendations provide opportunities for improvement, and corrective action is necessary to strengthen quality, efficiency, and control processes.



DATA FILES APPENDIX

Metric	Description	SUDS DATA File Used	Additional Data Used in Calculation	Functional Data Owner
1	Percent of Bachelor's Graduates Enrolled or Employed (\$40,000+)	SIFD	Florida Department of Economic Opportunity (DEO) analysis of the State Wage Interchange System (SWIS), and National Student Clearinghouse (NSC).	Registrar
2	Median Wages of Bachelor's Graduates Employed Full-time	SIFD	Florida Department of Economic Opportunity (DEO) analysis of the State Wage Interchange System (SWIS).	Registrar
3	Average Cost to the Student [Net Tuition & Fees per 120 Credit Hours for Resident Undergraduates]	HTD, SFA, SIF	The university's published tuition and fee amount and the College Board's national average book cost.	Registrar, Financial Aid
4	FTIC Four-Year Graduation Rate	SIF, SIFD, RET	None	Registrar
5	Academic Progress Rate [Second Year Retention Rate with At Least a 2.0 GPA]	SIF, RET	None	Registrar
6	Percentage of Bachelor's Degrees Awarded within Programs of Strategic Emphasis	SIFD	None	Registrar

7	University Access Rate [Percent of Undergraduates with a Pell grant]	SFA, SIF	None	Financial Aid, Registrar
8	Percentage of Graduate Degrees Awarded within Programs of Strategic Emphasis	SIFD	None	Registrar, Graduate School
9a	Three-Year Graduation Rate for FCS Associate in Arts Transfer Student	SIF, SIFD, RET	None	Registrar
9b	Six-Year Graduation Rate for Students awarded a Pell Grant in First Year	SIF, SIFD, RET, SFA	None	Registrar, Financial Aid
10	BOT Choice: Percent of Undergraduate FTE in Online Courses	SIF	None	Registrar

RET = Retention File
HTD = Hours to Degree

SFA = Student Financial Aid
SIF = Student Instruction File

SIFD = Student Instruction File, Degrees Awarded