



Performance-Based Funding Data Integrity 2025

Audit Report # 25-26_007

**Internal Auditing & Management Consulting
January 16, 2026**

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Chief Audit Executive**

EXECUTIVE SUMMARY

Florida Board of Governors (BOG) Regulations require university chief audit executives to conduct an annual audit to verify the integrity of the data submitted to BOG for implementing the Performance-based Funding (PBF) Model. Internal Auditing & Management Consulting (IAMC) conducted our audit for the data submitted for the 2024/25 year. Based on our risks assessments and those conducted by BOG, we selected Metrics 4, 6, and 8 for detailed audit testing. In addition, we tested the timeliness of data submissions.

The results of our testing indicated internal controls over the related processes appear to be strong. Data submissions were timely, accurate, complete, and complied with the data definitions established by BOG. No recommendations were offered.

Our audit provides an objective basis for the President and Board of Trustees (BOT) Chair to sign the representations included in the required *Performance Based Funding – Data Integrity Certification*.

SCOPE AND OBJECTIVES

We audited Performance Based Funding Data Integrity as of September 30, 2025. This audit was included as part of our 2025/26 audit work plan, conducted in accordance with a Board of Governors directive to State universities. Our specific objectives were to:

- Evaluate internal controls designed to ensure the timeliness, accuracy, and completeness of data submissions to the Board of Governors, and
- Provide an objective basis of support for the President and Chair of the Board of Trustees to sign the representations included in the *Performance Based Funding – Data Integrity Certification*, to be filed with the Board of Governors by March 1, 2026.

The scope of the audit included a review of data files submitted to BOG for the 2024/25 year, for the following metrics, unless otherwise noted:

- **Metric 4: Four Year Graduation Rate (FTIC)**
Degrees Awarded for the 2021 cohort
- **Cohort Adjustments**
For the 2021 cohort and cohort adjustments made since Fall 2024
- **Metric 6: Bachelor’s Degrees Awarded in Programs of Strategic Emphasis**
Degrees Awarded for the 202405, 202408, and 202501 semesters
- **Metric 8: Graduate Degrees Awarded in Programs of Strategic Emphasis**
Degrees Awarded for the 202405, 202408, and 202501 semesters

The audit scope and objectives were approved by the UWF President on September 18, 2025 and the UWF BOT Chair on September 23, 2025.

Audit fieldwork began on September 12, 2025 and ended on January 15, 2026. Our audit conforms to the Institute of Internal Auditors Global Internal Audit Standards and generally accepted auditing standards.

BACKGROUND

The Board of Governors serves as the governing body for the State University System of Florida. BOG has broad governance responsibilities affecting administrative and budgetary matters for Florida's 12 public universities. Beginning in fiscal year 2013/14, BOG implemented a performance-based funding model to evaluate Florida's 12 public universities on a range of issues. The model is based on ten metrics and incentivizes universities to improve on key metrics. Required data integrity audits have been performed annually since 2014. The culmination of these audits is the execution of the Data Integrity Certification document by the President and the Chair of the Board of Trustees. The submission of this Certification to BOG confirms our compliance with BOG Regulation 5.001(8).

Currently, the metrics that generally apply to all institutions are:

Metric 01	Percent of Bachelor's Graduates Employed (Earning \$40,000+) or Continuing their Education
Metric 02	Median Wages of Bachelor's Graduates Employed Full-time
Metric 03	Average Cost to the Student (Net Tuition and Fees per 120 Credit Hours for Resident Undergraduates)
Metric 04	Four Year Graduation Rate (Full-time FTIC)
Metric 05	Academic Progress Rate (Second Fall Retention Rate with at Least a 2.0 GPA for Full-time FTIC students)
Metric 06	Bachelor's Degrees Awarded within Programs of Strategic Emphasis
Metric 07	University Access Rate (Percent of Undergraduates with a Pell Grant)
Metric 08	Graduate Degrees Awarded within Programs of Strategic Emphasis
Metric 09a	Two-Year Graduation Rate for Florida College System Associate in Arts Transfer Students
Metric 09b	Six-Year Graduation Rate for Students Who are Awarded a Pell Grant in Their First Year

Metrics 1–9 Methodology

Much of the data that is used by BOG in their calculations of Metrics 1 through 9 is compiled into six data files that are submitted periodically by each of the universities. These files include:

- Admissions File
- Degrees Awarded File
- Hours to Degree File
- Retention File
- Student Financial Aid File
- Student Instruction File

Data that is ultimately provided to BOG through these electronic submissions is initially entered through the Admissions, Graduate Admissions, Registrar, Financial Aid, and Controller's departments into Banner (the University's Student Information and ERP system). The Office of Institutional Research (IR) has been delegated responsibility for compiling the data into tables

according to BOG’s data definitions and specifications, conducting quality reviews of the data prior to submission to BOG, and timely submission of data files.

Metric 10 Methodology

Each university is offered a “Board of Trustees Choice Metric,” which allows the institution to select a metric based on their university’s unique strengths. Since 2019/20, UWF has selected the following as its choice metric:

Metric 10 Percent of Baccalaureate Graduates Completing 2+ Types of High-Impact Practices (HIP)

UWF has accepted the following classification of High-Impact Practices established by the Association of American Colleges and Universities:

- First-Year Seminars and Experiences (includes Learning Communities)
- Common Intellectual Experience
- Writing-Intensive Courses
- Collaborative Assignments and Projects
- Research with Faculty
- Diversity/Global Learning
- ePortfolios
- Service Learning, Community-Based Learning
- Internships
- Capstone Courses and Projects

The data reported for Metric 10 is collected from Banner, as well as various functional offices. Metric 10 data collected from Banner is done so through the use of Banner Course Attributes. Each HIP is assigned a coordinating Banner Course Attribute, which is then used to ensure appropriate tracking, assessment, and reporting. Metric 10 data obtained directly from functional offices is done so through submission of student rosters. At this time, rosters of students participating in Research with Faculty, Study Abroad, and Living Learning communities are provided to IR by the respective areas.

Future Metric Changes

During its November 2025 meeting, BOG approved updates to the Performance-based Funding Model (referred to as Model 2.0), as well as new metrics. The changes are intended to reset the model and align with the updates to the State University System of Florida Strategic Plan, SUS 30. These changes will go into effect in 2026, but funding allocations will not be impacted by Model 2.0 until 2027. BOG will use the current model to allocate 2026-27 funding, with new benchmarks for metrics 6 and 8. BOG will simultaneously run Model 2.0 for comparison, but funding will not be allocated based on these scores. Model 2.0 is expected to be implemented in June 2027 for 2027-28 allocation. Changes will be seen across multiple metrics, including those that generally apply to all institutions as well as to metric 10, the institutions’ “Board of Trustees Choice Metric.”

Appointment of the Data Administrator

In accordance with BOG Regulation 3.007 “State University System (SUS) Management Information Systems,” the President has formally appointed the Assistant Vice President (AVP) of

IR as the University's Institutional Data Administrator. The AVP has frequent contact with the BOG Office of Data and Analytics staff, strengthening his understanding of their complex requirements for the data in the files.

AUDIT METHODOLOGY

This year's Performance-based Funding audit represents the University's twelfth required data integrity audit. As the University's data integrity processes and procedures have evolved, so too has IAMC's approach to assessing related risks. Using a risk-based approach, we considered the overall audit risk of each metric (including BOG's risk assessment of each metric), any changes to metric definitions or methodology, significant changes to University policies or procedures impacting data-related processes, as well as turnover of key personnel. Audit testing focused on the higher risk activities.

Audit testing was conducted on data submitted to BOG to evaluate its timeliness, accuracy, and completeness. We used data based on academic years or semesters, according to the time periods identified as part of the UWF Accountability Plan for 2025; if this information was not yet available, data in the last file submitted was used for testing purposes.

Detailed audit testing for specific metrics focused on data underlying the following:

Metric 4: Four Year Graduation Rate (FTIC)

- **Cohort Reconciliation**

To test the accuracy of the 2021 cohort as reported by IR, we obtained source data and compared it to the data provided by IR. Discrepancies within this reconciliation, if any, were investigated and resolved.

- **Cohort Degree Reconciliation**

To test the accuracy of the graduation (degree) data reported by IR for the 2021 cohort, we obtained source data and compared it to the data provided by IR. Discrepancies within this reconciliation, if any, were investigated and resolved.

- **Cohort Adjustments**

To test the accuracy of cohort adjustments made by IR, and to ensure their compliance with allowable exclusions per BOG methodology, we first obtained IR's lists of cohort adjustments made within the respective time frames (cohort adjustments made to the 2021 cohort and cohort adjustments made since Fall 2024). We requested the associated source documentation to verify the exclusions were allowable according to BOG methodology. Discrepancies, if any, were investigated and resolved.

Metric 6: Bachelor's Degrees Awarded in Programs of Strategic Emphasis

- **Classification of Bachelor's Degrees as Programs of Strategic Emphasis (PSE)**

To test the accuracy of IR's classification of bachelor's degrees as PSE or non-PSE, we obtained IR's list of PSE and non-PSE degrees. BOG determines if a degree is a Program of Strategic Emphasis based on the program's national Classification of Instructional Program

(CIP) code. We compared IR's classifications to BOG's listing of PSE and non-PSE bachelor's degrees to determine if IR's classifications were accurate. Discrepancies, if any, were investigated and resolved.

- **Total Number of Bachelor's Degrees Reported to BOG**

IR determined the total number of individual bachelor's degrees awarded during the 2024/25 year.

Reconciliation of Total Bachelor's Degrees to Source Data (both PSE and non-PSE)

To test the accuracy of the total number of bachelor's degrees awarded, we reconciled the total number of bachelor's degrees determined by IR to the total number of bachelor's degrees awarded per the Banner source data. Discrepancies within this reconciliation, if any, were investigated and resolved.

Total Bachelor's Degrees Reported to BOG

Once we verified the accuracy of the total number of bachelor's degrees determined by IR, we reconciled this information to the total number of bachelor's degrees reported to BOG in the Degrees Awarded file for each semester (202405, 202408, and 202501). Discrepancies within this reconciliation, if any, were investigated and resolved.

- **Individual Bachelor's Degrees Awarded**

IR determined the individual bachelor's degrees awarded during the 2024/25 year.

Reconciliation of Individual Bachelor's Degrees to Source Data (both PSE and non-PSE)

To test the accuracy of the individual bachelor's degrees awarded details (both PSE and non-PSE) determined by IR, we selected a sample of individual bachelor's degrees and verified the individual degree information agrees to Banner source data. Discrepancies within this reconciliation, if any, were investigated and resolved.

Individual Bachelor's Degrees Reported to BOG

To test the accuracy of individual bachelor's degrees awarded determined by IR (both PSE and non-PSE) was accurately reported to BOG, we selected a sample of individual degrees awarded as determined by IR and confirmed that the degrees were accurately reported to BOG. Discrepancies, if any, were investigated and resolved.

Metric 8: Graduate Degrees Awarded in Programs of Strategic Emphasis

- **Classification of Graduate Degrees as Programs of Strategic Emphasis**

To test the accuracy of IR's classification of graduate degrees as PSE or non-PSE, we obtained IR's list of PSE and non-PSE degrees. BOG determines if a degree is a Program of Strategic Emphasis based on the program's national Classification of Instructional Program (CIP) code. We compared IR's classifications to BOG's listing of PSE and non-PSE graduate degrees to determine if IR's classifications were accurate. Discrepancies, if any, were investigated and resolved.

- **Total Number of Graduate Degrees Reported to BOG**

IR determined a total number of individual graduate degrees awarded during the 2024/25 year.

Reconciliation of Total Graduate Degrees to Source Data (both PSE and non-PSE)

To test the accuracy of the total number of graduate degrees awarded, we reconciled the total number of graduate degrees determined by IR to the total number of degrees awarded per Banner source data. Discrepancies within this reconciliation, if any, were investigated and resolved.

Total Graduate Degrees Reported to BOG

Once we verified the accuracy of the total number of graduate degrees determined by IR, we reconciled this information to the total number of graduate degrees reported to BOG in the Degrees Awarded file for each semester (202405, 202408, 202501). Discrepancies within this reconciliation, if any, were investigated and resolved.

- **Individual Degrees Reported to BOG**

IR determined the individual graduate degrees awarded during the 2024/25 year.

Reconciliation of Individual Graduate Degrees to Source Data (both PSE and non-PSE)

To test the accuracy of the individual graduate degrees awarded details (both PSE and non-PSE) determined by IR, we selected a sample of individual graduate degrees and verified the individual degree information agrees to Banner source data. Discrepancies within this reconciliation, if any, were investigated and resolved.

Individual Graduate Degrees Reported to BOG

To test the accuracy of individual graduate degrees awarded determined by IR (both PSE and non-PSE) was accurately reported to BOG, we selected a sample of individual graduate degrees awarded as determined by IR and confirmed that the degrees were accurately reported to BOG. Discrepancies, if any, were investigated and resolved.

In addition, we reviewed the specified schedule for submission of data files to BOG via the State University Database System (SUDS) and determined the timeliness of the University's data submissions.

CONCLUSION ON GOVERNANCE, RISK MANAGEMENT, AND CONTROLS

In our opinion, governance over the University's Performance-based Funding data, processes, and activities were adequate to ensure compliance with applicable Florida Statutes, BOG regulations, and University policies. Institutional Research, as well as the multiple functional user areas, have retained key personnel, providing critical experience and continuity to ensure the integrity of the University's data and processes. Controls had been established in each area that were sufficient to ensure the integrity of the data and risks were being adequately managed.

KEY OBSERVATIONS

Metric 4: Four Year Graduation Rate (FTIC)

- **Cohort Reconciliation**

IR determined a total of 1,037 students comprised the 2021 cohort. We reconciled IR's 2021 cohort with Banner source data and determined IR's cohort was accurate. **This information agrees with the 2021 cohort data reported to BOG.**

- **Cohort Adjustments**

We obtained a list of IR's cohort adjustments for the 2021 cohort. We reviewed source documentation for these cohort adjustments and determined their appropriateness and compliance with allowable exclusions according to BOG methodology. We also performed this same set of procedures on cohort adjustments made since Fall 2024. **No discrepancies were noted.**

- **Cohort Degree Reconciliation**

IR determined a total of 558 degrees were awarded for students in the 2021 cohort. We reconciled IR's total number of degrees for the 2021 cohort to Banner source data and determined IR's total number of degrees for the 2021 cohort was accurate. **This information agrees with the cohort degrees awarded reported to BOG.**

- **Graduation Rate**

IR determined the 4-year graduation rate of the 2021 cohort to be 53.8% (558 degrees awarded to students in the 2021 cohort divided by 1,037 students in the 2021 cohort). **Based on our testing of the cohort and degrees awarded to students in the cohort, IR's graduation rate appears to be accurate.**

Metric 6: Bachelor's Degrees Awarded in Programs of Strategic Emphasis

- **Classification of Bachelor's Degrees as PSE or Non-PSE**

IR internally tracks CIP codes and the University's degree programs that correspond with each of the respective codes. IR assigns each bachelor's degree as a PSE or non-PSE degree, based on the degree's CIP code. BOG determines if a degree is a Program of Strategic Emphasis based on the program's national Classification of Instructional Program (CIP) code. We compared IR's classifications to BOG's listing of PSE and non-PSE bachelor's degrees to determine if IR's classifications were accurate. During our testing of PSE classifications, **we noted one instance where a bachelor's degree program had been misclassified for PSE purposes.** This classification is internal and no degrees were awarded within the program, so there was no impact on the University's metrics. **During fieldwork and prior to the issuance of this report, IR corrected the misclassification.**

- **Total Number of Bachelor's Degrees Reported to BOG**

IR determined a total number of 2,257 bachelor's degrees were awarded for the 202405, 202408, and 202501 semesters. We reconciled IR's total number of bachelor's degrees awarded to Banner source data and determined IR's total number of bachelor's degrees was accurate. **This information agrees with the total number of bachelor's degrees**

reported to BOG in the Degrees Awarded files for the 202405, 202408, and 202501 semesters.

- **Individual Bachelor's Degrees Awarded**

IR determined a total number of 2,257 individual bachelor's degrees were awarded for the 202405, 202408, and 202501 semesters. We selected a sample of individual bachelor's degrees and verified the degree information agrees to Banner source data. Using that same sample, we verified the bachelor's degrees were accurately reported to BOG. **No discrepancies were noted.**

Metric 8: Graduate Degrees Awarded in Programs of Strategic Emphasis

- **Classification of Graduate Degrees as PSE or Non-PSE**

IR internally tracks CIP codes and the University's degree programs that correspond with each of the respective codes. IR assigns each graduate degree as a PSE or non-PSE degree, based on the degree's CIP code. BOG determines if a degree is a Program of Strategic Emphasis based on the program's national Classification of Instructional Program (CIP) code. We compared IR's classifications to BOG's listing of PSE and non-PSE graduate degrees to determine if IR's classifications were accurate. **No discrepancies were noted.**

- **Total Number of Graduate Degrees Reported to BOG**

IR determined a total number of 1,616 graduate degrees were awarded for the 202405, 202408, and 202501 semesters. We reconciled IR's total number of graduate degrees awarded to Banner source data and determined IR's total number of graduate degrees was accurate. **This information agrees with the total number of graduate degrees reported to BOG in the Degrees Awarded files for the 202405, 202408, and 202501 semesters.**

- **Individual Graduate Degrees Awarded**

IR determined a total number of 1,616 individual graduate degrees were awarded for the 202405, 202408, and 202501 semesters. We selected a sample of individual graduate degrees and verified the degree information agrees to Banner source data. Using that same sample, we verified the graduate degrees were accurately reported to BOG. **No discrepancies were noted.**

Timeliness

We reviewed the SUDS Master Calendar for required data submissions related to PBF. All files were noted as submitted and accepted in the SUDS system. A review of SUDS and discussions with the Institutional Data Administrator indicated that submissions were generally timely.

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 pursuant to Florida Statute 1001.92 are timely, accurate, complete, and comply with the data definitions established by BOG.

RECOMMENDATIONS

No deficiencies or findings were noted during our audit. As such, we offer no recommendations or proposed corrective action plans.

We appreciate the cooperation, professionalism, and responsiveness of the employees who participated in the audit.

Respectfully submitted,

A handwritten signature in black ink that reads "David J. Bryant". The signature is written in a cursive style with a prominent horizontal line at the end.

David J. Bryant, CIA, CFE, CPA, CGFM, CGAP, CRMA
Chief Audit Executive

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APPENDIX A – RISK RATING FRAMEWORK

Risk Rating	Criteria
High	<p>Significant internal control or risk management concern that if not corrected or mitigated could lead to serious consequences.</p> <p>Immediate attention from University personnel required.</p>
Moderate	<p>Minor procedural lapses, internal control gaps, and/or failure of defined controls which could lead adverse impacts.</p> <p>Timely attention from University personnel is warranted.</p>
Low	<p>Recommendation may lead to improvement in the quality and/or efficiency of the process or area audited, or conformance to best practices.</p> <p>Routine attention from University personnel is warranted.</p>