UNIVERSITY OF FLORIDA

OFFICE OF INTERNAL AUDIT

Audit of:	University of Florida Performance Based Funding – Data Integrity
Period of Audit:	As of September 30, 2018
Report Issue Date:	October 30, 2018
Report Number:	UF-19-723-08

UF | UNIVERSITY of FLORIDA

Office of the President
Office of Internal Audit

903 W. University Avenue
PO Box 113025
Gainesville, FL 32611-3025
352-392-1391
352-392-3149 Fax
http://oia.ufl.edu

October 30, 2018

MEMORANDUM

TO: UF Board of Trustees Audit and Compliance Committee

FROM: Joe Cannella III
Interim Chief Audit Executive

SUBJECT: Performance Based Funding – Data Integrity audit

We audited the University of Florida's data submission process related to data metrics used for the BOG's performance based funding initiative, as of September 30, 2018. The attached report defines the scope of our audit and contains analysis and comments.

Please call me if you have any questions regarding the contents of the audit report.

JC:dh

cc: President Fuchs
Provost and Sr. Vice President
Sr. Vice President and COO
Assistant Provost and Director, Institutional Planning and Research
Auditor General

UNIVERSITY OF FLORIDA

PERFORMANCE BASED FUNDING – DATA INTEGRITY

As of September 30, 2018

TABLE OF CONTENTS

EXECUTIVE SUMMARY 1

AUDIT REPORT 2

Scope and Objectives 2

Background 2

Overall Conclusion 5

Attachment A: Performance Based Funding March 2019 Data Integrity Certification

Attachment B: Board of Governors Performance Based Funding 2018 Metric Definitions

Attachment C: Performance Based Funding Metric Scores for 2015-2016, 2016-2017 and 2017-2018, and 2018-2019

Attachment D: Overview of the University SUDS Submission Data and Process Flows

MANAGEMENT RESPONSE 12

PERFORMANCE BASED FUNDING – DATA INTEGRITY

EXECUTIVE SUMMARY

Pursuant to Section 1001.92, Florida Statutes, the Board of Governors (BOG) implemented a performance based funding (PBF) model, which is intended to build upon the BOG's strategic plans and goals and annual accountability reports. This model seeks to further elevate the SUS while acknowledging each university's distinct mission.

The integrity of the data provided to the BOG by the universities is critical to the PBF decision-making process. Therefore, the BOG developed a Performance Based Funding Data Integrity Certification Form to provide assurances that the data submitted by the university is reliable, accurate, and complete. This certification form is to be executed by the university president, affirmatively certifying each representation and/or providing an explanation as to why the representation cannot be made as written. The certification is also to be approved by the university Board of Trustees (BOT) and executed by the BOT chair.

On July 12, 2018, the chairman of the BOG instructed each university BOT to "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 will provide an objective basis of support for the president and BOT chair to certify the required representations.

The Office of Internal Audit conducted an audit of the university's data submission process, related to data metrics used for the BOG's performance based funding initiative, as of September 30, 2018. The primary objective of this audit was to determine the adequacy of university controls in place to promote the completeness, accuracy, and timeliness of these data submissions to the BOG.

Based on the results of our audit procedures, we concluded that controls over the university's data submission process were adequate to promote the completeness, accuracy, and timeliness of submitted data relative to the BOG's PBF initiative. Our conclusion of "adequate" indicates that controls were in place and functioning as designed.

PERFORMANCE BASED FUNDING – DATA INTEGRITY

AUDIT REPORT

Scope and Objectives

On July 12, 2018, the chairman of the Board of Governors (BOG), instructed each university board of trustees to "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 with an emphasis on the data that supports performance funding metrics.

We have completed an audit, as of September 30, 2018, of the university's data submission process related to data metrics used for the BOG's performance based funding initiative. The primary objective of this audit was to determine the adequacy of university controls in place to promote the completeness, accuracy, and timeliness of these data submissions to the BOG.

Because of the inherent limitation in the application of such controls, errors or irregularities may, nevertheless, occur and not be detected. Also, assurances regarding the adequacy of internal controls cannot be projected to future periods due to the risk that procedures may become inadequate because of changes in conditions or compliance with procedures may deteriorate.

We conducted the audit in accordance with the International Standards for the Professional Practice of Internal Auditing as promulgated by the Institute of Internal Auditors. The audit fieldwork was conducted from August 1, 2018 through October 18, 2018 in accordance with the 2018-2019 audit work plan, and pursuant to the BOG directive to the University of Florida Board of Trustees (BOT).

Background

The Florida Legislature has called upon the State University System (SUS) of Florida to reach new levels of efficiency, academic quality and accountability. Pursuant to Section 1001.92, Florida Statutes, the BOG implemented a performance-based funding (PBF) model, which is intended to build upon the BOG's strategic plans and goals and annual accountability reports. This model seeks to further elevate the SUS while acknowledging each university's distinct mission.

The integrity of the data provided to the BOG by the universities is considered critical to the performance based funding decision-making process. Therefore, the BOG developed a Performance Based Funding Data Integrity Certification to provide assurances that the data submitted to the BOG for PBF decision-making is reliable, accurate, and complete. This certification form is to be executed by the university president, affirmatively certifying each representation and/or providing an explanation as to why the representation cannot be made as written. The certification form is also to be approved and certified by the

BOT chair. This audit is intended to provide an objective basis of support for the president and BOT chair to certify the required representations (See Attachment A).

According to BOG Regulation 5.001(1), the PBF model is based upon four guiding principles:

- Align with SUS Strategic Plan goals
- Reward excellence or improvement
- Have a few clear, simple metrics
- Acknowledge the unique mission of the different institutions

The PBF Model includes ten metrics that evaluate the institutions' performance in a variety of different strategic areas:

- Eight of the ten metrics are common to all institutions. These include metrics on employment after graduation, cost to the student, graduation rates, academic progress, programs of strategic emphasis, and access to the university. In March 2018, metric 4 was changed from 6-year graduation rate to 4-year graduation rate.
- The ninth metric, chosen by the BOG, focuses on areas of improvement and distinct missions of each university. For the University of Florida, this metric was changed in November 2017 to the Percent of Bachelor's Degrees without Excess Hours.
- The final metric is chosen by each university BOT from the remaining metrics in the University Work Plans that are applicable to their mission. The University of Florida BOT selected the number of licenses/options executed annually.

Attachment B provides a list of the BOG Performance Based Funding Metric Definitions

Attachment C identifies the University of Florida's final scores for the past four allocation years and the 2018-2019 benchmarks.

The BOG Regulation 3.007, SUS Management Information System, states that SUS universities shall provide accurate data to a management information system established and maintained by the BOG Office. The BOG has created a web-based State University Database System (SUDS) Master File Submission Subsystem for the SUS to report their data.

The BOG Regulation 1.001, University Board of Trustees Powers and Duties, authorizes BOG regulations over local Boards of Trustees and sets expectations for University Administration and Oversight, requiring each board of trustees to maintain an effective information system to provide accurate, timely, and cost-effective information about the university, and requires that all data and reporting requirements of the BOG are met.

The number of files to be uploaded is dependent on the submission type. Once all required files and any desired optional files for the submission are uploaded, the university checks the submission based on edits and standard reports generated by SUDS. The SUDS system will identify errors or anomalies which may cause the file to be rejected. These items should be corrected or explained on the source file and uploaded to the system to be checked again. This process is iterated until the submission is free of all significant errors and/or the errors are explained. Once that is accomplished, the university is ready to 'officially'

submit the data to the BOG for approval. The electronic submission certifies that the file/data represents the position of the university for the term reported.

Once submitted, BOG staff review the edit results, error explanations, and standard reports. The submission will either be accepted or rejected. If rejected, the reason will be posted to the user and a resubmission requested. If accepted, the submitted data will be promoted to the production database.

Organizational Responsibilities

The Office of Institutional Planning and Research (IPR) provides university management with information that supports institutional planning, policy formation and decision making; coordinates responses to inquiries for university-related information; serves as a comprehensive source for information about the institution; and administers data collection and reporting of institutional data to state and federal entities.

The IPR was comprised of a director and ten other staff responsible for completing the BOG requests, as well as requests from other internal or external parties. The IPR estimates they annually receive 850 data requests of which 34% originate from the BOG.

The data owners at the university consist of the core offices responsible for the extraction and compilation of the institutional data that support the BOG submissions and other data requests. Upon creating the submission file from the authoritative system of records, their staff are responsible for reviewing and correcting data in the information systems prior to the submission through SUDS. The following offices/units were responsible for compiling the data files for the PBF metrics and were included within the scope of this audit:

- **Office of University Registrar (OUR)**: Responsible for student records and degree information used to create the Student Instruction File (SIF) and Degrees Awarded (SIFD). This data was used in multiple metrics involving graduation, retention, academic progress, cost to student, and strategic emphasis.
- **Office of Undergraduate Affairs (OUA)**: Responsible for degree audit monitoring and generation of the Hours to Degree (HTD) file. This data was used in Metric 3 (Cost to the Student) and Metric 9 (Excess Hours).
- **Bursar**: Responsible for processing waivers in the Student Financial System and verifying the fee waiver table for SIF submissions. This data was used in metric 3 for determining the cost to the student
- **Student Financial Affairs (SFA)**: Responsible for the financial aid award data used to create the SFA file. This data was used in Metrics 3 (Cost to the Student) and 7 (University Access Rate).
- **Office of Technology Licensing (OTL):** Responsible for compiling a list of all licenses/options and reporting to the Association of University Technology Managers through their annual Licensing Survey. The information is used for the Board of Trustees Choice Metric 10f.
- **Enterprise Systems (ES)**: This unit provided information technology (IT) support to the various other units and was directly responsible for maintaining certain systems as well as compiling data and generating reports from those systems for the other core offices.

The data owners work collaboratively with IPR to review and explain errors noted in the SUDS edit summaries. The IPR then performs a final review to evaluate data accuracy prior to the data administrator or designee certifying the submission to the BOG for their approval. At any point, the BOG may ask the university to address additional exceptions requiring further review, explanation, or resubmission of the file.

Attachment D is a flowchart summarizing the data and process flows from extraction through the BOG approval.

Prior Audit Comments

An internal control audit of Performance Based Funding – Data Integrity was performed as of September 30, 2017, with audit report UF-18-703-06 issued November 21, 2017. The audit results included no comments in regards to the university's data submission process.

Overall Conclusion

To identify and evaluate the controls in place relative to the university's data submissions in support of the PBF metrics, we conducted employee interviews, performed analytical reviews, evaluated risks related to each metric, reviewed program codes, performed process walkthroughs, and tested reported values to source data.

Based on the results of our audit procedures, we concluded that controls over the university's data submission process were adequate to promote the completeness, accuracy, and timeliness of submitted data relative to the BOG's PBF initiative. Conclusions relative to specific data owners and other comments on the data submission process, including audit procedures employed, are described below.

DATA ADMINISTRATOR (DA)

BOG Regulation 3.007(2) states that each university president shall appoint an institutional DA to be responsible for managing university responses to the Board's official information requests. The president has formally appointed the IPR Director as the DA for the university, and the director's job description clearly defined her role as the DA. We noted that IPR Director has the overall responsibility to serve as the official point of contact with the BOG for transmission of data and reports. These responsibilities included the integrity of data reported to the BOG and promoting data stewardship on campus by working with different functional areas to resolve data issues, improve data quality and to assure that external reporting standards are met.

The DA also participated in the Council of Data Administrators (CODA) with other Florida university data administrators. The council's vision statement asserts that the CODA exists to promote and ensure that reliable and consistent data are used and reported by SUS institutions for current and future information-based decisions. Collectively, the DAs work to improve communication or find solutions that institutions consistently must address related to SUDS, such as incorrectly flagged records on submission error reports or mismatched file comparisons.

IPR Review and Edit Procedures

BOG Regulation 3.007(2)(b) states that the DA is responsible for providing complete responses to information requests within the time frame specified by the Board Office. Pursuant to the schedule set forth in the submission section of each file, IPR developed a Data Request System to communicate and monitor the required deadlines with data owners. The IPR works directly with the BOG Office of Data Analytics regarding edits and data definitions to enhance the accuracy and quality of the data being submitted.

Extensive procedures were performed by the data owners during their data extraction and review, and by the IPR during their review and submissions. Consistent and timely communication between the IPR and the data owners was critical to coordinate these procedures to meet the required deadlines. We reviewed evidence noting that IPR worked with the data owners and the BOG to resolve errors or inconsistencies within data elements. In addition, each data owner was required to submit a certification statement summarizing the work performed, verifying the supporting documents were maintained, and acknowledging the file was ready to submit.

We noted that IPR had comprehensive written procedures to document the work initiation and quality checking procedures to validate the accuracy of the data being submitted. We verified, through walkthroughs, that the IPR was following the written procedures by reviewing and comparing historical data for validity. For SIF and SIFD, we also noted a comparison was performed on areas such as enrollment, majors, student credit hours, and degree level awarded.

The IPR also had an internal review checklist and Data Quality Review summary in place to document procedures performed and issues noted for each BOG submission. IPR utilized the information documented in the summary to take proactive steps to resolve those issues from recurring in subsequent submissions. We reviewed all PBF-related submissions and observed that the quality checking procedures for the BOG submissions were performed by two IPR staff, with a final review by the IPR director.

The IPR director also submitted an annual letter to the president attesting to her due diligence to promote assurance that the submissions were timely, accurate and complete. The IPR created a file sharing site called the “President’s Portal” to facilitate the review and access to documentation as well as correspondence concerning the submissions for the PBF metrics.
We evaluated the controls and systems that promote accountability and timely reporting. We tested all nine submissions related to PBF from October 1, 2017 through September 30, 2018 and noted all submissions were timely, submitted by the appropriate staff with certification and explanations of any errors, approved by the DA, and accepted by the BOG.

Based on the results of our review, we concluded that the IPR employed adequate review and edit processes, including appropriate documentation of their procedures.

DATA OWNERS

To understand the requirements for complete and accurate submissions, we reviewed the SUDS Data Dictionary, documentation from SUS data workshops, and BOG methodology and procedures applicable

to the PBF submissions. The BOG issued annual notices communicating updates for reporting of institutional data based on the results of SUS data workshops. Depending on the required changes, the university may need to modify procedures or program code. Example of changes noted in the 2017 SUS data workshop was the new element of waiver/exemption type for the SIF submission, which related to Metric 3.

After gaining an understanding of the submission requirements, we reviewed key procedures for each data owner related to the extraction, compilation, and review of their data to ensure completeness and accuracy of the submission. We performed a risk analysis of the applicable metrics, taking into consideration changes in internal procedures for extraction, review, and submission processes. We also considered staffing changes, the significant changes in reporting requirements between years, variances in the data reported, and historical scores received.

The following is a summary of our review and conclusions for each data owner.

Office of University Registrar (OUR)

The mainframe-based Student Records System was the authoritative system of record (master data) for the SIF, SIFP, SIFD, and HTD. Metric submissions generated from these records involved graduation, retention, academic progress, and information regarding the programs of strategic emphasis (STEM programs).

The OUR had developed automated quality control checks that determined whether the data was within the BOG-expected parameters and allowed them to review the student data on a daily basis and make corrections, as necessary, prior to the SUDS submission. Because the mainframe-based system did not have input data validation checks, the OUR quality control checks looked for internal inconsistencies in the data, such as a student with their major not matching between internal files, invalid degree sought, incorrect matriculation status, blank data, invalid birth date, and student class level blank or inconsistent with other data.

We reviewed the OURs documented procedures for data extraction, review and upload, noting no significant changes since the prior audit in staffing, procedures, or BOG reporting requirements. The written procedures specifically addressed change management controls, processing and review of ad hoc reports, production jobs, and uploads. The OUR employed automated continuous monitoring procedures as well as separate layering of reviews to help assure the student data was accurate. We noted that the quality control procedures were performed by experienced staff prior to the final review by the DA.

The documented procedures indicated that IT system controls were in place for change management, access, data quality, audit logging, and security. Program change management controls were in place for both production scheduled jobs and the ad hoc generated reports. Access to production libraries were limited to personnel who were authorized to make changes. IT staff were tasked with the system and program changes while functional staff could make changes to data only through the applications, providing a separation of job functions.

SUDS submission data was stored in staging tables in a relational database on the mainframe. A custom application limited editing of the data to core office staff prior to a local download by the analyst and then upload to SUDS. We reviewed system and data security to ensure direct data access to files and relational database tables had been controlled. The records on the table kept track of the last user who made a change to the data and the date of change. At time of download, a control total report was generated by email to the OUR staff providing a summary of total number of records. We verified that both control total reports matched the spring SIF and SIFD submission record counts. Based on our review, we determined that access to make changes was limited to only authorized users.

We tested a random sample of 100 student records for SIF and SIFD submissions by comparing the data to the system of record to verify the accuracy of key elements identified in the BOG Methodology and Procedures. We found no exceptions for the sampled data elements.

OUR also coordinated with the Bursar Office for validation of the waivers, which were reported as part of the SIF submission for metric 3. We confirmed that the Bursar Office had established a process to verify the accuracy and completeness of the data by comparing the SUDS summary report with the Tuition Waiver Report from myUFL Enterprise Reporting. We reviewed the reports for Spring 2018 and determined the amount of waivers reported was accurately reflected in myUFL.

Based on the results of our review, we concluded that the OUR's processes were adequate for extraction, review and upload of student data to the SUDS.

Office of Undergraduate Affairs (OUA)

The "Hours to Degree" (HTD) file consists of students who graduated with their first baccalaureate degree but not more than one degree or a combined degree (BS/MS). Additionally, the submission contains a Courses to Degree (CTD) table which contain a listing of courses for each student that were used and not used to satisfy their degree.

OUA staff used the Student Academic Support System (SASS) to produce the data to build the HTD file. To build the HTD file, the IT staff developed a batch job that runs and pulls all the data together from the OUR core files in the Student Records System and combines that with the degree audits to create the submission file. The HTD file creation process was similar to the OUR process and used the same IT controls over submission data using the database staging tables, SUDS edit screens, and file download process.

We also noted the OUR staff coordinate with OUA and assist with checking the count of students on the HTD file as compared with the SIFD submission to provide a reasonable point of comparison for expected number of records.

We randomly selected 50 students and verified that the students' course information in CTD matched the data in the student record system. We did not have any differences for the key elements tested. We also performed our own data analytics review for data consistency and integrity testing between the HTD and

SIFD files. We found no significant errors with the HTD file and, based on our audit procedures, concluded that the HTD file submission appeared complete and accurate.

Based on the results of our review, we concluded that the OUA's processes were adequate for extraction, review and upload of student data to the SUDS.

Student Financial Affairs (SFA)

The primary role of SFA is to provide financial resources to students who would otherwise be unable to receive post-secondary education. Grants and scholarships are often called "gift aid" that does not have to be repaid. The BOG utilizes the amount of grants and scholarships students received to calculate Cost to the Student for Metric 3 and to evaluate access for students from low-income families (Metric 7).

We reviewed SFA's documented procedures for data extraction, review and upload, noting no significant changes since the prior audit in staffing, procedures, or BOG reporting requirements. Management also documented their review procedures for historical data comparison and verification of the amount of Pell Grants disbursed for Fall 2016 ($21,854,977).

We randomly selected eight financial aid awards and verified that the amount reported to the BOG, totaling $128,176,719, for the period 2016 and 2017 agreed with the SFA Funds Management system. All amounts reported were in agreement with the SFA Funds Management system of record.

Based on the results of our review, we concluded that SFA employed adequate processes to ensure data accuracy, completeness, and timely creation of the load file.

Office of Technology Licensing

The Office of Technology Licensing (OTL) connects researchers with investors and industry to lead them through the commercialization process. The OTL was responsible for reporting licenses (patents, copyrights, and trademarks) to the Association of University Technology Managers (AUTM) in their annual Licensing Survey. The data in this survey was used by the BOG to identify the university's ranking within Association of American Universities for Metric 10f.

OTL maintained a spreadsheet to track license agreements for the university. As noted in the 2018 Accountability Plan, there were a total of 293 licenses reported to the AUTM for the 2016 fiscal year. We verified the number of licenses reported agreed with the information tracked in the spreadsheet. Based on our review, the processes to compile and report the licensing information were generally adequate to promote that the licenses were accurately reported.

OTHER COMMENTS

Resubmissions

Resubmissions are typically an iterative process between the BOG, the DA and the data owners to correct data errors or anomalies identified by the SUDS edit process. Resubmissions may also be necessary in the event the university finds errors in its reporting system or the BOG does not agree with the comments identified in the SUDS review process. When errors are identified with a data submission that has already been accepted, BOG Regulation 3.007(2)(c) requires the DA shall email a resubmission request to the Office of Data Analytics.

We reviewed the DA's data resubmissions to the BOG to ensure these resubmissions were necessary, authorized, and were not indicative of any inherent problems in the submission process for PBF metrics. The resubmissions were related to the annual Retention file for 2016 and SIFD for Summer 2017.

The retention file was resubmitted due to the BOG procedural change for submitting Person ID changes. The resubmission was needed to correct nine student records, which resulted in a slightly higher academic progress rate by 0.17%. The Summer SIFD was resubmitted due to late degree processing where two students should have been reported as double major or double degree.

Based on the results of our review, resubmissions were performed within a reasonable time after the request. The need for the resubmissions at the university did not appear to be a systematic problem and generally consisted of individual data changes that would have no impact on the PBF metrics.

SUDS System Access Control

Data upload and submissions to the BOG were performed through a secure website. The DA was assigned the role of Data Administrator for the SUDS System by the BOG System Administrator. The DA's role was the highest level assignable at the institution and was assigned to only one individual at each SUS institution.

As of September 2018, there were 46 employees with access to SUDS. The DA and four IPR staff were the only individuals authorized to process submissions. In addition, the DA and two IPR staff were the only individuals with the Security Manager role that provided the ability to create users and assign roles to the authorized submissions that the user is responsible to process.

Procedures required a written approval by the supervisor and the DA to grant access to SUDS. We verified that the required approvals were obtained for all new users during the audit period. IPR also generates a monthly monitoring report to identify any changes in university personnel records for users with access. Based on our review of monitoring reports, we concluded that adequate controls were in place over authorization and monitoring of SUDS access.

Student Information System Modernization

The university initiated a large-scale three-year project in January 2016 to implement a new student information system by August 2018 to replace the decades old mainframe based Student Records System. Key offices, dedicated staff, and an implementation consultant were involved in the project and the new Campus Solutions information system was implemented on August 20, 2018. Although the submission files for the 2019 PBF metrics were sourced from the mainframe, for next year's audit the new system will be the authoritative source and system of record. We interviewed staff, reviewed project documentation and meeting notes, and participated with IPR on a committee to ensure that the BOG reporting requirements were adequately addressed. We noted that development, testing, and review was underway for producing the SIFP submission for Fall 2018, but that the reporting development effort had not been completed by the October 2018 deadline and a two-week extension was requested.

General Comment

We wish to express our appreciation to the management and staff of the Office of Institutional Planning and Research, Enterprise Systems, the Office of the University Registrar, the Office for Student Financial Affairs and Office of Technology and Licensing for the courtesy and cooperation extended to us during this review.

Audit Supervised by:	Joe Cannella	
Audit Conducted by:	Jeff Capehart	Choi Choi
	Lily Ly	Parvaneh Fazeli

STATE UNIVERSITY SYSTEM of FLORIDA
Board of Governors

Performance Based Funding

March 2019 Data Integrity Certification

University Name: _____

INSTRUCTIONS: Please respond "Yes" or "No" for each representation below. Explain any "No" responses to ensure clarity of the representation you are making to the Board of Governors. Modify representations to reflect any noted audit findings.

Performance Based Funding Data Integrity Certification Representations			
Representations	**Yes**	**No**	**Comment / Reference**
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.	☐	☐	
2. These internal controls and monitoring activities include, but are not limited to, reliable processes, controls, and procedures designed to ensure that data required in reports filed with my Board of Trustees and the Board of Governors are recorded, processed, summarized, and reported in a manner which ensures its accuracy and completeness.	☐	☐	
3. 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.	☐	☐	
4. In accordance with Board of Governors Regulation 3.007, my university shall provide accurate data to the Board of Governors Office.	☐	☐	
5. In accordance with Board of Governors Regulation 3.007, I have appointed a Data Administrator to certify and manage the submission of data to the Board of Governors Office.	☐	☐	

Performance Based Funding

Data Integrity Certification

Performance Based Funding Data Integrity Certification Representations			
Representations	**Yes**	**No**	**Comment / Reference**
6. 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 Data Committee. The due diligence includes performing tests on the file using applications/processes provided by the Board Office.	☐	☐	
7. When critical errors have been identified, through the processes identified in item #6, a written explanation of the critical errors was included with the file submission.	☐	☐	
8. 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.	☐	☐	
9. In accordance with Board of Governors Regulation 3.007, my Data Administrator electronically certifies data submissions in the State University Data System by acknowledging the following statement, "Ready to submit: Pressing **Submit for Approval** represents electronic certification of this data per Board of Governors Regulation 3.007."	☐	☐	
10. I am responsible for taking timely and appropriate preventive / corrective actions for deficiencies noted through reviews, audits, and investigations.	☐	☐	
11. I recognize that the Board's Performance Based Funding initiative will drive university policy on a wide range of university operations – from admissions through graduation. I certify that university policy changes and decisions impacting this initiative 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 performance metrics.	☐	☐	
12. I certify that I agreed to the scope of work for the Performance Based Funding Data Integrity Audit conducted by my chief audit executive.	☐	☐	

Performance Based Funding

Data Integrity Certification

Performance Based Funding Data Integrity Certification Representations, Signatures
I certify that all information provided as part of the Board of Governors Performance Based Funding Data Integrity Certification 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_____ President
I certify that this Board of Governors Performance Based Funding Data Integrity Certification has been approved by the university board of trustees and is true and correct to the best of my knowledge. Certification: _____ Date_____ Board of Trustees Chair

Attachment B

PERFORMANCE BASED FUNDING 2018 METRIC DEFINITIONS

1. Percent of Bachelor's Graduates Enrolled or Employed ($25,000+) One Year After Graduation	This metric is based on the percentage of a graduating class of bachelor's degree recipients who are enrolled or employed (earning at least $25,000) somewhere in the United States. Students who do not have valid social security numbers and are not found enrolled are excluded. This data now includes non-Florida data from 41 states and districts, including the District of Columbia and Puerto Rico. Sources: State University Database System (SUDS), Florida Education & Training Placement Information Program (FETPIP) and Florida Department of Economic Opportunity (DEO) analysis of Wage Record Interchange System (WRIS2) and Federal Employment Data Exchange (FEDES), and National Student Clearinghouse (NSC).
2. Median Wages of Bachelor's Graduates Employed Full-time One Year After Graduation	This metric is based on annualized Unemployment Insurance (UI) wage data from the fourth fiscal quarter after graduation for bachelor's recipients. This data does not include individuals who are self-employed, employed by the military, those without a valid social security number, or making less than minimum wage. This data now includes non-Florida data from 41 states and districts, including the District of Columbia and Puerto Rico. Sources: State University Database System (SUDS), Florida Education & Training Placement Information Program (FETPIP) and Florida Department of Economic Opportunity (DEO) analysis of Wage Record Interchange System (WRIS2) and Federal Employment Data Exchange (FEDES), and National Student Clearinghouse (NSC).
3. Cost to the Student Net Tuition & Fees for Resident Undergraduates per 120 Credit Hours	This metric is based on resident undergraduate student tuition and fees, books and supplies as calculated by the College Board (which serves as a proxy until a university work group makes an alternative recommendation), the average number of credit hours attempted by students who were admitted as FTIC and graduated with a bachelor's degree for programs that requires 120 credit hours, and financial aid (grants, scholarships and waivers) provided to resident undergraduate students (does not include unclassified students). Source: State University Database System (SUDS), the Legislature's annual General Appropriations Act, and university required fees.
4. Four Year FTIC 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 admits' students who were admitted as a degree-seeking student prior to high school graduation. Source: State University Database System (SUDS).
5. Academic Progress Rate 2nd Year Retention with GPA Above 2.0	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 were still enrolled in the same institution during the Fall term following their first year with had a grade point average (GPA) of at least 2.0 at the end of their first year (Fall, Spring, Summer). Source: State University Database System (SUDS).
6. Bachelor's Degrees within Programs of Strategic Emphasis	This metric is based on the number of baccalaureate degrees awarded within the programs designated by the Board of Governors as 'Programs of Strategic Emphasis'. A student who has multiple majors in the subset of targeted Classification of Instruction Program codes will be counted twice (i.e., double-majors are included). Source: State University Database System (SUDS).
7. University Access Rate *Percent of Undergraduates with a Pell-grant*	This metric is based the number of undergraduates, enrolled during the fall term, who received a Pell-grant during the fall term. Unclassified students, who are not eligible for Pell-grants, were excluded from this metric. Source: State University Database System (SUDS).
8a. Graduate Degrees within Programs of Strategic Emphasis	This metric is based on the number of graduate degrees awarded within the programs designated by the Board of Governors as 'Programs of Strategic Emphasis'. A student who has multiple majors in the subset of targeted Classification of Instruction Program codes will be counted twice (i.e., double-majors are included). Source: State University Database System (SUDS).

PERFORMANCE BASED FUNDING
2018 METRIC DEFINITIONS

8b. Freshmen in Top 10% of High School Class Applies only to: NCF	Percent of all degree-seeking, first-time, first-year (freshman) students who had high school class rank within the top 10% of their graduating high school class. Source: New College of Florida as reported to the Common Data Set.

BOG Choice Metric

9. Percent of Bachelor's Degrees Without Excess Hours	This metric is based on the percentage of baccalaureate degrees awarded within 110% of the credit hours required for a degree based on the Board of Governors Academic Program Inventory. Note: It is important to note that the statutory provisions of the "Excess Hour Surcharge" (1009.286, FS) have been modified several times by the Florida Legislature, resulting in a phased-in approach that has created three different cohorts of students with different requirements. The performance funding metric data is based on the latest statutory requirements that mandates 110% of required hours as the threshold. In accordance with statute, this metric excludes the following types of student credits (ie, accelerated mechanisms, remedial coursework, non-native credit hours that are not used toward the degree, non-native credit hours from failed, incomplete, withdrawn, or repeated courses, credit hours from internship programs, credit hours up to 10 foreign language credit hours, and credit hours earned in military science courses that are part of the Reserve Officers' Training Corps (ROTC) program). Source: State University Database System (SUDS).

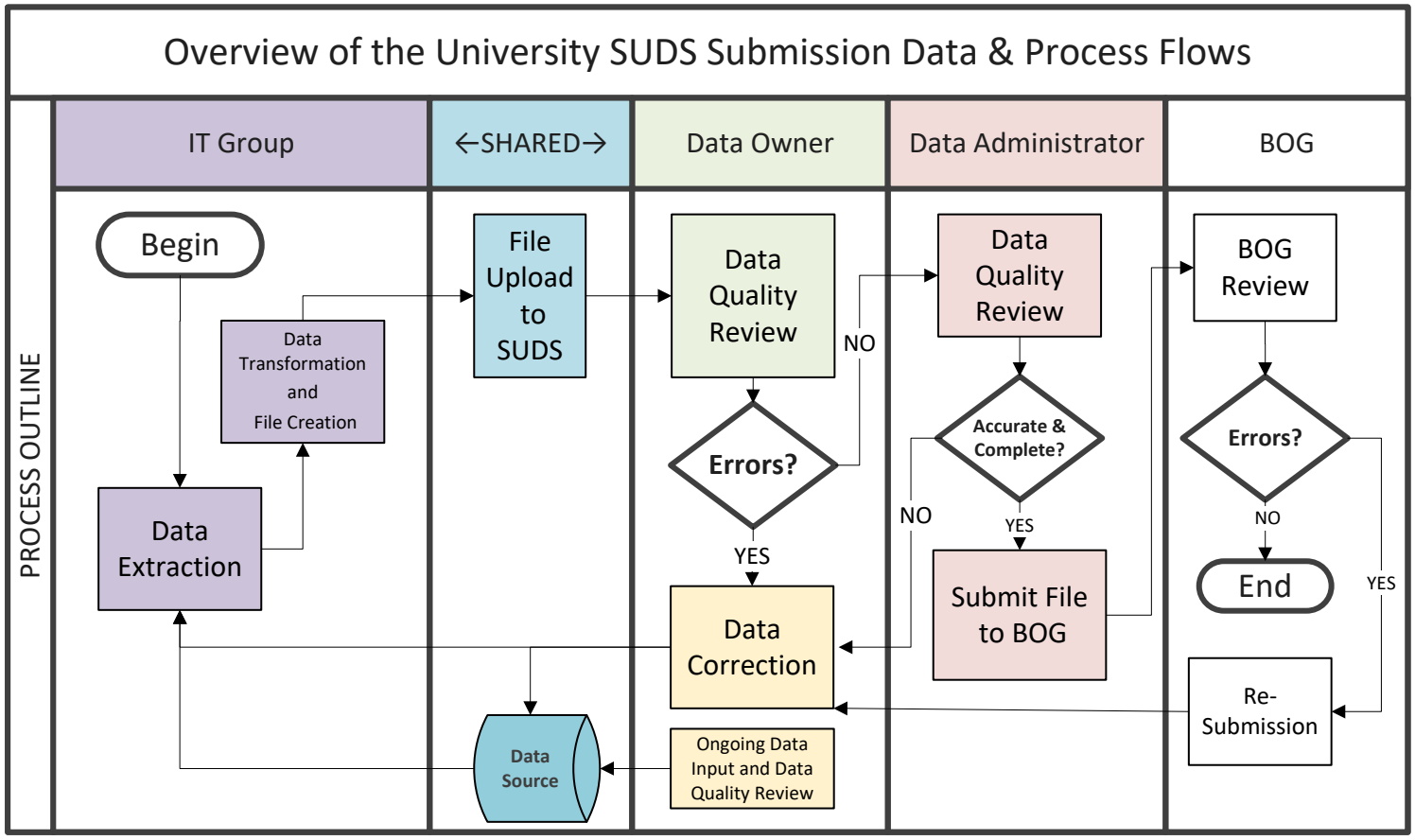
PERFORMANCE BASED FUNDING
2018 METRIC DEFINITIONS

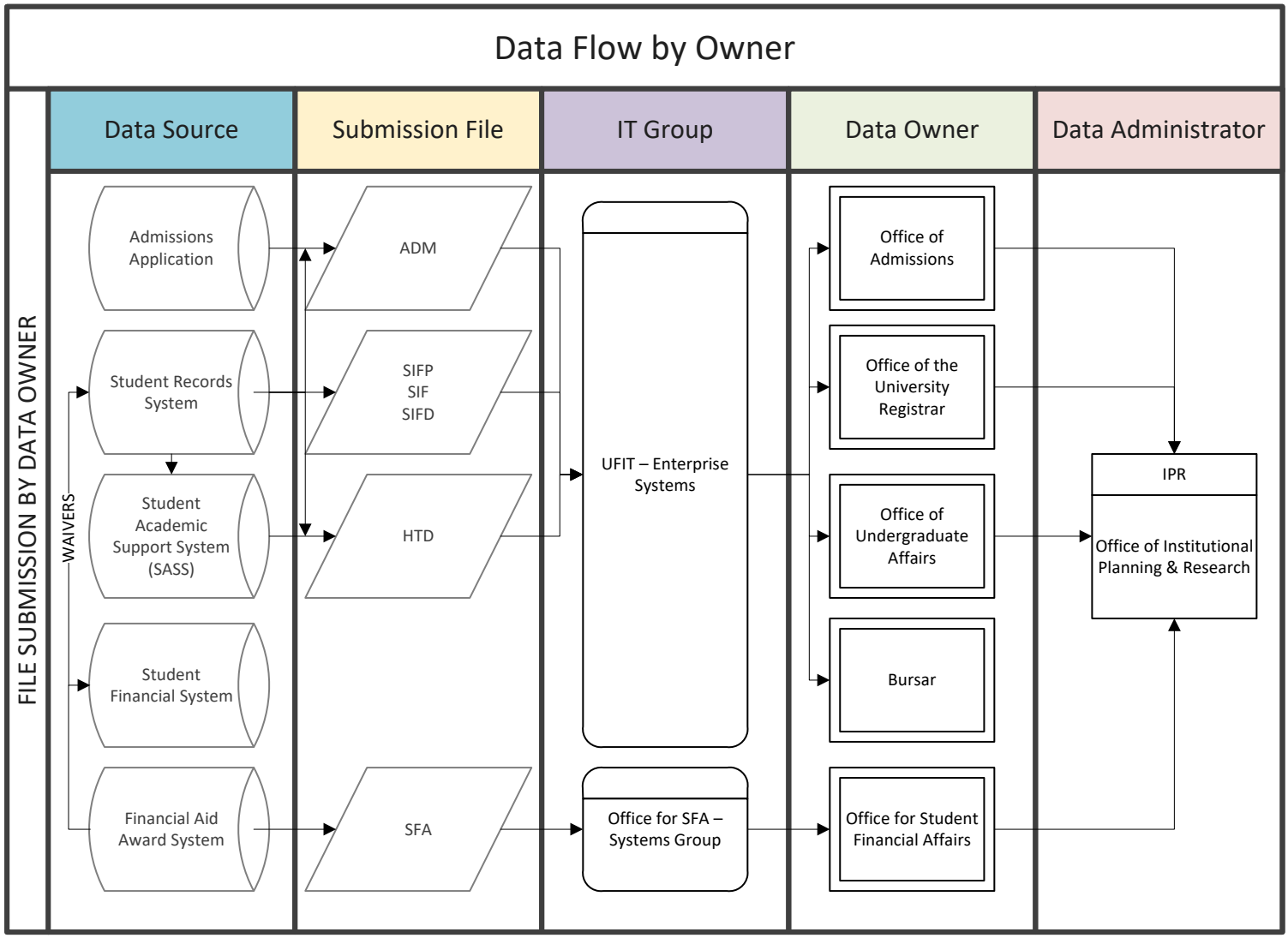
BOT Choice Metrics

10a. Percent of R&D Expenditures Funded from External Sources FAMU	This metric reports the amount of research expenditures that was funded from federal, private industry and other (non-state and non-institutional) sources. Source: Accountability Report (Table 6A), National Science Foundation annual survey of Higher Education Research and Development (HERD).
10b. Bachelor's Degrees Awarded to Minorities FAU, FGCU, FIU	This metric is the number, or percentage, of baccalaureate degrees granted in an academic year to Non-Hispanic Black and Hispanic students. This metric does not include students classified as Non-Resident Alien or students with a missing race code. Source: Accountability Report (Table 4I), State University Database System (SUDS).
10c. National Rank Higher than Predicted by the Financial Resources Ranking Based on U.S. and World News FSU	This metric is based on the difference between the Financial Resources rank and the overall University rank. U.S. News measures financial resources by using a two-year average spending per student on instruction, research, student services and related educational expenditures - spending on sports, dorms and hospitals doesn't count. Source: US News and World Report's annual National University rankings.
10d. Percent of Undergraduate Seniors Participating in a Research Course NCF	This metric is based on the percentage of undergraduate seniors who participate in a research course during their senior year. Source: New College of Florida.
10e. Number of Bachelor Degrees Awarded Annually UCF	This metric is the number of baccalaureate degrees granted in an academic year. Students who earned two distinct degrees in the same academic year were counted twice; students who completed multiple majors or tracks were only counted once. Source: Accountability Report (Table 4G), State University Database System (SUDS).
10f. Number of Licenses/Options Executed Annually UF	This metric is the total number of licenses and options executed annually as reported to Association of Technology Managers (AUTM). The benchmarks are based on UF's rank within AAU institutions. Source: Accountability Report (Table 6A), University of Florida.
10g. Percent of Undergraduate FTE in Online Courses UNF	This metric is based on the percentage of undergraduate full-time equivalent (FTE) students enrolled in online courses. The FTE student is a measure of instructional activity that is based on the number of credit hours that students enroll by course level. Distance Learning is a course in which at least 80 percent of the direct instruction of the course is delivered using some form of technology when the student and instructor are separated by time or space, or both (per 1009.24(17), F.S.). Source: Accountability Report (Table 3C), State University Database System (SUDS).
10h. Number of Postdoctoral Appointees USF	This metric is based on the number of post-doctoral appointees at the beginning of the academic year. A postdoctoral researcher has recently earned a doctoral (or foreign equivalent) degree and has a temporary paid appointment to focus on specialized research/scholarship under the supervision of a senior scholar. Source: National Science Foundation/National Institutes of Health annual Survey of Graduate Students and Postdoctorates in Science and Engineering (GSS).
10i. Percentage of Adult Undergraduates Enrolled UWF	This metric is based on the percentage of undergraduates (enrolled during the fall term) who are at least 25 years old at the time of enrollment. This includes undergraduates who are unclassified (not degree-seeking) students. Source: State University Database System (SUDS).

Performance Based Funding Metric Scores

Metric #	Metric Description	Points	Funding Model Year 2015-2016	2016-2017	2017-2018	2018-2019
1	**Percent of Bachelor's Graduates Enrolled or Employed (earning at least $25,000) - *in the U.S. One Year After Graduation***	*Points Received*	**5**	**6**	**8**	**9**
		Maximum Points	**5**	**10**	**10**	**10**
		Percent of Maximum	100%	60%	80%	90%
2	**Median Wages of Bachelor's Graduates Employed Full-time One Year After Graduation**	*Points Received*	**5**	**8**	**10**	**10**
		Maximum Points	**5**	**10**	**10**	**10**
		Percent of Maximum	100%	80%	100%	100%
3	**Cost to the Student - *Net Tuition and Fees per 120 credit hours***	*Points Received*	**3**	**6**	**8**	**8**
		Maximum Points	**5**	**10**	**10**	**10**
		Percent of Maximum	60%	60%	80%	80%
4	**Four Year FTIC Graduation Rate - *Percent of first-time-In-college students who graduate within four years***	*Points Received*	**5**	**10**	**10**	**10**
		Maximum Points	**5**	**10**	**10**	**10**
	Metric change in 2018-2019 from Six Year FTIC Graduation Rate	*Percent of Maximum*	100%	100%	100%	100%
5	**Academic Progress Rate - *2nd Year Retention with GPA Above 2.0***	*Points Received*	**5**	**10**	**10**	**10**
		Maximum Points	**5**	**10**	**10**	**10**
		Percent of Maximum	100%	100%	100%	100%
6	**Bachelor's Degrees Awarded within Programs of Strategic Emphasis - *as designated by the Board of Governors***	*Points Received*	**5**	**10**	**10**	**10**
		Maximum Points	**5**	**10**	**10**	**10**
		Percent of Maximum	100%	100%	100%	100%
7	**University Access Rate - *Percent of Undergraduates with a Pell-grant***	*Points Received*	**5**	**10**	**9**	**6**
	Access rate scale was changed in 2018-2019 due to Senate Bill 4	*Maximum Points*	**5**	**10**	**10**	**10**
		Percent of Maximum	100%	100%	90%	60%
8a	**Graduate Degrees Awarded within Programs of Strategic Emphasis - *as designated by the Board of Governors***	*Points Received*	**5**	**10**	**10**	**10**
		Maximum Points	**5**	**10**	**10**	**10**
		Percent of Maximum	100%	100%	100%	100%
9b	**Percent of Bachelor's Degrees without Excess Hours**	*Points Received*	**3**	**5**	**10**	**10**
	Metric change in 2018-2019 from Number of Faculty Awards: applies to UF and FSU only	*Maximum Points*	**5**	**10**	**10**	**10**
		Percent of Maximum	60%	50%	100%	100%
10f	**Number of Licenses/Options Executued Annually: *applies to UF only***	*Points Received*	**3**	**7**	**10**	**10**
		Maximum Points	**5**	**10**	**10**	**10**
		Percent of Maximum	60%	70%	100%	100%
Note:	***Points in red are based on improvement scoring***	***Total Points Received***	**44**	**82**	**95**	**93**
	Scale change from a maximum of 50 points to 100 points occurred in 2016-2017	***Maximum Points***	**50**	**100**	**100**	**100**
		Percent of Maximum	88%	82%	95%	93%


Overview of the University SUDS Submission Data & Process Flows
PROCESS OUTLINE
IT Group
←SHARED→
Data Owner
Data Administrator
BOG
Begin
Data Transformation and File Creation
Data Extraction
File Upload to SUDS
Data Quality Review
NO
Errors?
YES
Data Correction
Data Source
Ongoing Data Input and Data Quality Review
Data Quality Review
Accurate & Complete?
NO
YES
Submit File to BOG
BOG Review
Errors?
NO
End
YES
Re-Submission


Data Flow by Owner
FILE SUBMISSION BY DATA OWNER
Data Source
Submission File
IT Group
Data Owner
Data Administrator
Admissions Application
Student Records System
Student Academic Support System (SASS)
Student Financial System
Financial Aid Award System
WAIVERS
ADM
SIFP
SIF
SIFD
HTD
SFA
UFIT – Enterprise Systems
Office for SFA – Systems Group
Office of Admissions
Office of the University Registrar
Office of Undergraduate Affairs
Bursar
Office for Student Financial Affairs
IPR
Office of Institutional Planning & Research

UF | UNIVERSITY of FLORIDA

Office of the Provost and Senior Vice President

235 Tigert Hall
PO Box 113175
Gainesville, Fl. 32611-3175

October 26, 2018

Audit and Compliance Committee
University of Florida Board of Trustees
903 W. University Avenue, Room 217
CAMPUS

Dear BOT Audit and Compliance Committee Members:

I am writing to indicate my concurrence with the *Performance Based Funding-Data Integrity* audit report as of September 30, 2018. I have reviewed the substance of that report in a meeting with Joe Canella and the audit staff in an exit meeting on October 25, 2018.

I would like to thank Joe and his staff for the substantial amount of work they put into this audit review in support of the university's Performance Funding effort.

Sincerely yours,

Joseph Glover
Provost and Senior Vice President for Academic Affairs

STATE UNIVERSITY SYSTEM of FLORIDA
Board of Governors

Performance Based Funding

March 2019 Data Integrity Certification

University Name: University of Florida

INSTRUCTIONS: Please respond "Yes" or "No" for each representation below. Explain any "No" responses to ensure clarity of the representation you are making to the Board of Governors. Modify representations to reflect any noted audit findings.

Performance Based Funding Data Integrity Certification Representations			
Representations	**Yes**	**No**	**Comment / Reference**
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.	☒	☐	
2. These internal controls and monitoring activities include, but are not limited to, reliable processes, controls, and procedures designed to ensure that data required in reports filed with my Board of Trustees and the Board of Governors are recorded, processed, summarized, and reported in a manner which ensures its accuracy and completeness.	☒	☐	
3. 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.	☒	☐	
4. In accordance with Board of Governors Regulation 3.007, my university shall provide accurate data to the Board of Governors Office.	☒	☐	
5. In accordance with Board of Governors Regulation 3.007, I have appointed a Data Administrator to certify and manage the submission of data to the Board of Governors Office.	☒	☐	

Performance Based Funding

Data Integrity Certification

Performance Based Funding Data Integrity Certification Representations			
Representations	**Yes**	**No**	**Comment / Reference**
6. 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 Data Committee. The due diligence includes performing tests on the file using applications/processes provided by the Board Office.	☒	☐	
7. When critical errors have been identified, through the processes identified in item #6, a written explanation of the critical errors was included with the file submission.	☒	☐	
8. 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.	☒	☐	
9. In accordance with Board of Governors Regulation 3.007, my Data Administrator electronically certifies data submissions in the State University Data System by acknowledging the following statement, "Ready to submit: Pressing **Submit for Approval** represents electronic certification of this data per Board of Governors Regulation 3.007."	☒	☐	
10. I am responsible for taking timely and appropriate preventive / corrective actions for deficiencies noted through reviews, audits, and investigations.	☒	☐	
11. I recognize that the Board's Performance Based Funding initiative will drive university policy on a wide range of university operations – from admissions through graduation. I certify that university policy changes and decisions impacting this initiative 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 performance metrics.	☒	☐	
12. I certify that I agreed to the scope of work for the Performance Based Funding Data Integrity Audit conducted by my chief audit executive.	☒	☐	

Performance Based Funding
Data Integrity Certification

Performance Based Funding Data Integrity Certification Representations, Signatures
I certify that all information provided as part of the Board of Governors Performance Based Funding Data Integrity Certification 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 10/26/18 President
I certify that this Board of Governors Performance Based Funding Data Integrity Certification has been approved by the university board of trustees and is true and correct to the best of my knowledge. Certification: _____ Date 12/7/18 Board of Trustees Chair