

UNIVERSITY OF FLORIDA

OFFICE OF INTERNAL AUDIT

Audit of:	University of Florida Performance Based Funding and Preeminence – Data Integrity
Period of Audit:	As of September 30, 2019
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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>

November 21, 2019

MEMORANDUM

TO: UF Board of Trustees Audit and Compliance Committee

FROM: Joe Cannella III 
Interim Chief Audit Executive

SUBJECT: Performance Based Funding and Preeminence – Data Integrity audit

We audited the University of Florida's data submission process related to data metrics used for the Board of Governors' performance based funding initiative and preeminent designation status, as of September 30, 2019. 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 AND PREEMINENCE – DATA INTEGRITY

As of September 30, 2019

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PERFORMANCE BASED FUNDING AND PREEMINENCE – 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 BOG also implemented the Preeminent State Research Universities Program in 2013 to award universities demonstrating high performance. The program was designed to promulgate a set of academic and research excellence standards where universities must meet or exceed 11 of the 12 benchmarks to earn the preeminent designation.

The integrity of the data provided by the universities is critical to the BOG decision-making process. Therefore, the BOG developed a Data Integrity Certification Form to provide assurances that the data submitted to the BOG for PBF and preeminence status 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 June 18, 2019, the chairman of the BOG instructed each university's 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, as of September 30, 2019, of the university's data submission process related to metrics used for the BOG's performance based funding initiative and preeminence status. 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 for PBF and preeminence metrics. Our conclusion of "adequate" indicates that controls were in place and functioning as designed.

PERFORMANCE BASED FUNDING AND PREEMINENCE - DATA INTEGRITY

AUDIT REPORT

Scope and Objectives

On June 18, 2019, the chairman of the 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.

We have completed an audit, as of September 30, 2019, of the university’s data submission process related to data metrics used for the BOG’s performance based funding initiative and preeminence status. 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 July 11, 2019 through October 22, 2019 in accordance with the 2019 audit work plan, and pursuant to the BOG directive to the University of Florida BOT.

Background

During the 2019 Legislative Session, lawmakers approved Senate Bill 190 to amend Florida Statutes section 1001.706, which states that each university shall conduct an annual audit to verify that the data submitted for Preeminent State Research Universities Program and State University System Performance-Based Incentive complies with the data definitions established by the board and shall submit the audit to the Board of Governors Office of Inspector General as part of the annual certification process required by the Board of Governors.

The Preeminent State Research Universities Program was established in 2013 to award universities demonstrating high performance. It promulgated a set of academic and research excellence standards such as graduation rates, student retention rates, research expenditures, the number of patents awarded, and the size of the endowment. Universities must meet or exceed 11 of the 12 benchmarks to earn the preeminence designation. Attachment A identifies the preeminence metrics and University of Florida’s performance, as reported in the 2019 Accountability Plan.

The PBF model was established in 2014 to align the State University System Strategic Plan goals and 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 four was changed from a six-year graduation rate to a four-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 be 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 performance score for 2019 was based on the national ranking for number of licenses/options executed annually. In 2020, the university has elected to change this metric to the six-year Graduation Rate.

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 three allocation years and the 2019-2020 benchmarks.

The BOG Regulation 3.007, State University System (SUS) Management Information System, states the 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.

Upon upload of all required files to SUDS, the system will generate a series of edits and standard reports to identify errors or anomalies which may cause the files to be rejected. There is an iterative process to validate that the submissions are free from BOG identified errors. These items are corrected or explained on the source file and uploaded to the system to be checked again. 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.

The BOG developed a Data Integrity Certification process to obtain assurances that the data submitted to the BOG for PBF and preeminence status 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 D).

Organizational Responsibilities

The Office of Institutional Planning and Research (IPR) is responsible for providing university leadership with information that supports institutional planning, policy formation and decision making; serving as a comprehensive source for information about the institution; and administering the reporting of institutional data to state and federal entities.

The IPR consisted of a data administrator, appointed to certify and manage the submission of data, and eight other staff responsible for completing BOG requests as well as requests from other internal or external entities. The IPR estimated they annually receive more than 1,200 data requests, of which at least 40 percent originate from the BOG.

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, key 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 and were included within the scope of this audit:

- **Office of Admissions (Admissions):** Responsible for the admission records related to freshman, transfer, graduate, online and international students. This data was used for the calculation of average high school GPA (Preeminence Metric 1a) and average SAT score (Preeminence Metric 1b). The admission data also served as the underlying source to derive the key PBF elements for the Enrollments table.
- **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 the PBF and preeminence 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 for determining the cost to the student (PBF Metric 3) and excess hours (PBF Metric 9).
- **Bursar:** Responsible for processing waivers in the Student Financial System. This data was used in PBF 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 Cost to Student (PBF Metric 3) and University Access Rate (PBF Metric 7).
- **Cost Analysis:** Responsible for compiling the cost of research expenditures reported in the National Science Foundation (NSF) Higher Education Research and Development Survey (HERD). This information is used for determining the amount of research expenditures in multiple preeminence metrics.
- **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 BOT 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 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 E 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, 2018, with audit report UF-19-723-08 issued October 30, 2018. 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 and preeminence metrics, we conducted employee interviews, performed analytical reviews, evaluated risks related to each metric, reviewed program extraction 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 for PBF and preeminence metrics. 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 certify and manage the submission of data to the SUS management information system. We verified the president had formally appointed the IPR director as the DA for the university and her job description clearly defined her role as the DA. We noted that the IPR director has the overall responsibility to serve as the official point of contact with the BOG for submission 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 council can improve communication or find solutions that institutions consistently address related to SUDS such as standardizing codes or edits between data elements.

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. The Office of Data Analytics is responsible to collect and manage the SUDS submissions for the BOG. Pursuant to the schedule set forth in the submission section of the specification of each file, IPR utilized a Data Request System to communicate and monitor the required deadlines with data owners.

Extensive procedures were performed by the data owners during their data extraction and review, and by the IPR during their review and submissions. We noted IPR worked with the data owners and the BOG to resolve errors or inconsistencies within data elements. Each data owner was required to submit a certification statement summarizing the work performed to verify the accuracy of the data, the supporting documents were maintained, and to acknowledge that the file was ready to submit.

We noted that IPR had comprehensive written procedures and checklists to document the work initiation and quality-checking procedures to validate the accuracy of the data being submitted. For example, IPR staff reviewed and compared historical data for validity. We reviewed the support and verified their review was adequately documented in the Data Quality Review summary where it provided a reference and steps that were needed to resolve the data issues from recurring in subsequent submissions

With the implementation of the new student system as described in the IT section below, we verified IPR performed an extensive review in checking the accuracy and consistency of data for all elements amongst the tables within the submission for SIF and SIFD. We reviewed the Data Quality Review Summary and email correspondence to address data issues and discrepancies such as student demographics, courses taken, student group, fundable credit hours, and residency.

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 store and retrieve documentation and correspondence concerning the submissions for the metrics.

We tested all twelve SUDS submissions for PBF and preeminence from October 1, 2018 (the date of our last audit) through September 30, 2019 to verify timeliness and certification by the data owners. We noted that all submissions were submitted by data owners with certification for accuracy and explanations of any errors, approved by the DA, and accepted by the BOG. However, we noted that four submissions were not submitted according to the scheduled date due to technical difficulties of resolving errors in the new student system. Specifically, the delay of the Fall 2018 SIF submission impacted the timely submission of SIFD and Retention as these files verified the referential integrity from SIF. While there were no formal extension procedures, we verified that the DA had notified the BOG chief data officer of the planned delay prior to the submission date to ensure the revised submission date would meet their reporting requirements.

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

Information Technology

The university completed a large-scale three-year project in December 2018 to implement a new student information system, Oracle/PeopleSoft Campus Solutions, to replace the decades old mainframe-based student systems. Key offices, dedicated staff, and an implementation consultant were involved in the project and Campus Solutions was implemented on August 20, 2018 with a stabilization period through the end of the year.

For this audit period, we noted that the reporting conversions had been completed for SIF and SIFD submissions. Conversely, the development, testing, and review was underway for Admissions, SFA and HTD. Due to the timing of new systems, data conversion and new data input, the submission for SIF and SIFD were sourced from Campus Solutions while others used the mainframe as the authoritative source and system of record. The legacy mainframe system was still used for some processing until the system was officially decommissioned and shut down on October 2, 2019.

To gain an understanding of the new information systems and data, we interviewed staff, reviewed project documentation and meeting notes, and engaged with a federation of student data users. The Campus Solutions information system was designed to store and update transactional student data in real time. UFIT utilized DataStage, a specialized set of extraction, translation, and loading (ETL) processes, as part of the SUDS reporting. The ETL processing began with making “snapshots” of the transactional data. A daily snapshot was created for preparing the BOG data tables and getting the submission files ready for data owners to review. As each BOG SUDS submission was nearing its due date, a special “frozen snapshot” was created on the freeze date. The frozen snapshot was then used to build the submission tables. After the submission, the “build” tables were copied into an “archive” table. In this manner, permanent secure records of the data were kept as that data existed in the transactional system precisely at the time the snapshot was taken, to ensure reproducibility, auditability, and accountability.

We reviewed the ETL processes and program code for SIF and SIFD to ensure that the BOG reporting requirements were adequately addressed. Our review focused on the program logic, data flow, and data mappings. We evaluated the key elements pertaining to PBF and preeminence metrics for alignment with the SUDS Data Dictionary definitions. Based on our review of the system documentation, we concluded that the programming logic steps were reasonable for accurate and complete data extraction and transformation. We identified one category of student type, post-baccalaureate, that was not coded accurately. Although this student type did not have any impact on the relevant metrics, we reported the error to management and staff confirmed with IT that it was corrected. Overall, we concluded that the reported data elements were derived appropriately from the Campus Solutions system of record data sources.

Program change management controls were in place for Campus Solutions applications, production scheduled jobs and the DataStage ETLs, as well as generated reports in the Cognos Analytics environment. SUDS submission data was stored in staging tables in an Oracle database in Campus Solutions. A custom application allows OUR and Admissions staff to make corrections to the data prior to generating the submission file for uploading to SUDS. IT staff were tasked with the system and program changes. Functional staff could make changes to data only through the applications, providing a separation of job functions. We reviewed system and data security to ensure direct data access to files and relational database tables had been controlled. Appropriate role-based security for DataStage was assigned to staff based on their job duties, as well as appropriate Oracle database access restrictions. In addition, IT had adequate process in place to document requests to update the submission file including the SQL code used and the records affected.

Based on our review, we determined that there were adequate IT system controls in place for change management, access restrictions, data quality, audit logging, and overall security of student data in Campus Solutions.

DATA OWNERS

Using the established BOG methodology for PBF and preeminence, we performed a risk analysis to determine the level of review, including the amount of testing we would perform with data owners. Our risk analysis took into consideration changes in the information systems and internal procedures for extraction, review, and submission processes. We also considered staffing changes, changes in reporting requirements between years, variances in the data reported, and score received. Based on the results of our risk analysis, our review primarily focused on university data submissions. We did not include in the scope of our review the three preeminence metrics in which the BOG utilized third party information directly.

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 and preeminence metrics. 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 codes. An example of a change noted in the SUS data workshop was that a new value for Benacquisto Scholars was added to the waiver type for SIF, which related to Metric 3.

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

Office of Admissions

Admissions was responsible for application servicing for all levels of student entry into the university including beginning freshmen, transfers, graduate students, online students, students applying to professional school programs, and international recruitment strategies.

Historically, Admissions used the legacy mainframe-based systems for all information processing. As part of the COMPASS project, Admissions implemented a new admission processing system, known as Slate, in September 2018, for future applications. The submissions for Fall 2018 and Spring 2019 were continually sourced from the mainframe while admission applications processing transitioned to Slate.

We performed a walk-through of controls at Admissions including edit processes, error correction, and data extraction and upload processes. Written procedures and a processing checklist were in place to verify the accuracy of data for submissions generated using the mainframe. Admissions staff reviewed internal reports and SUDS system error reports for inconsistencies and invalid data. Example of errors reported included invalid last institution code, mismatch for degree highest held, and missing high school GPA/test scores.

We randomly selected 100 records from the Fall 2018 and Spring 2019 submissions to verify the accuracy of key elements identified for the preeminence metrics. Our testing noted that the high school GPA and college GPA were accurately reported for admitted students. However, we identified six instances where the best sub-score for ACT was not reported. We discussed these exceptions with IPR and concluded there was no impact to any PBF or preeminence metrics, and management has confirmed that this issue was corrected in the new system.

Based on the results of our review, we concluded that the Admissions' processes were reasonable for extraction, review and upload of student data to the SUDS in the mainframe environment.

The Summer 2019 data was submitted on September 20, 2019 and was the first file sourced from Slate. Due to the timing of the audit, our review was limited to the review of the general processing controls and testing of the mainframe process, as new procedures were being developed for Slate. For example, staff stated they compared the submission data to admission type reports from Slate to identify the correct population of students.

Office of University Registrar (OUR)

In Campus Solutions an academic structure consisted of a student's career, program, and plans. These records are linked to the terms, classes, grades and graduation in the Student Information System, which is the authoritative system of records for the SIF, SIFP, SIFD, and HTD submissions. Metrics generated from these records involved graduation, retention, academic progress, and information regarding the programs of strategic emphasis (STEM programs).

The OUR utilized continuous monitoring procedures to help assure the student data was accurate. The OUR quality control checks looked for internal inconsistencies in the data such as a student with invalid degree level sought, undergraduate students with an invalid degree highest held, invalid race or gender code, and student class level inconsistent with other data. Additionally, written procedures specifically addressed processing and review of ad hoc reports, production jobs, and uploads. We noted that the quality control procedures were performed by experienced staff prior to the final review by the DA. With the conversion of more than 19 million student enrollment records from legacy mainframe data, the OUR worked closely with IT to identify and resolve data issues such as programming logic or data mapping for elements in the SIF submissions for both Fall 2018 and Spring 2019.

To ascertain the accuracy of the data submitted for SIF and SIFD, we analyzed the submitted data for Spring 2019 as compared to the system data represented by a frozen snapshot generated in the ETL process. Our analysis noted that very minimal changes (less than 0.2 percent) were made to correct SUDS reported diagnostic errors. We evaluated all these adjustments and determined they were reasonable based on the correlation with other variables from the file.

We utilized various testing methods to verify the reported information agreed to the data in Campus Solutions. For some elements we verified 100 percent of the data and others we selected a random sample of student records from the SIF and SIFD submissions covering all the key elements identified in the BOG Methodology. We found several instances where the total institutional grade points and hours in the Fall 2018 SIF submission did not match. Upon discussions with IPR, we concluded that the errors did not have an impact on PBF metrics, and the root cause was identified and corrected.

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.

Bursar's Office

Waivers are a non-cash method of satisfying all or a portion of tuition and fee costs, which include state-authorized waivers, graduate assistantship/fellowship, employee education program, and UF department awarded waivers. We noted that the Bursar's Office had an adequate process in place for ensuring that waivers were applied to the correct students' accounts in the myUFL Student Financial System.

Additionally, IPR had coordinated with the Bursar's Office for validation of the waivers, which were reported as part of the SIF submission and used for PBF Metric 3. We compared the submission file with the frozen snapshot and confirmed the minor differences were appropriate as it pertained to university's regulations on state funding. We also ran an enterprise report for Spring 2019 and determined that the total dollar amount of all waivers reported was accurately reflected in myUFL. Based on our audit results, we concluded that the procedures used to report waivers were generally adequate.

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 contains a listing of courses for each student that indicates whether the course was used to satisfy their degree.

The annual submission for 2017-2018 HTD was generated from the legacy mainframe student records system prior to decommissioning. The key OUA staff confirmed that there were no procedural changes relating to the HTD submission, which utilized the Student Academic Support System (SASS) to evaluate the student's academic records in reference to the completion of program requirements for each degree. To build the HTD file, the IT staff had developed an automated process to pull all the data together from the OUR core files in the Student Records System and combine that with the degree audits to create the submission file.

Through the review of correspondence, we observed that there were shared efforts amongst OUA and OUR in checking the count of students and courses data for accuracy. We randomly selected 30 students and verified that the students' course information in CTD matched the data in the student record system. We found no differences for the key elements tested. 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. Universities generally use financial aid to offset the published tuition price to recruit students based on merit and/or to impact campus diversity. The BOG utilized the amount of grants and scholarships students received to calculate cost to the student for PBF Metric 3 and to evaluate the percentage rate of university access for students from low-income families (PBF 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 variances in financial aid award programs such as the Florida Public Student Assistance Grant.

We randomly selected 100 financial aid awards and verified the amount reported to the BOG agreed with the SFA financial records in the system without exception.

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

Office of Technology Licensing (OTL)

The 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.

We reviewed the process OTL utilized to reporting licenses. As noted in the 2019 Accountability Plan, there were a total of 226 licenses reported to the AUTM for the 2018 fiscal year. We verified that the number of licenses reported agreed with the information tracked in the internal database. Based on our review, the processes to compile and report the licensing information were generally adequate to promote that the licenses were accurately reported.

Cost Analysis

Total research expenditures reported to the NSF were used in the preeminence metrics. Cost Analysis was responsible for responding to the NSF HERD survey and had developed queries using myUFL general ledger data to identify all university research-related expenses. Adequate written procedures were established to ascertain the specific accounting chart fields used to identify research expenditures. In addition, the information was reviewed and approved by the university controller and director for the Division of Sponsored Programs prior to submission.

We compared the total research expenditures reported in the 2018 HERD survey with the university's audited financial statement ended on June 30, 2018. We determined that the amounts reported were comparable and far exceeded the minimum threshold established for the preeminence metrics.

Based on our audit results, we concluded that the procedures used to report amounts in the HERD survey used by the BOG were adequate.

OTHER COMMENTS

Retention

The BOG built an annual retention file using data submitted from ADM, SIF, and SIFD. It established the number of students in a cohort and the number of those same students who are retained or graduated by a specified year. Such information is used in the calculation of retention and graduation rates for both the PBF and preeminence metrics.

We noted that IPR had procedures and processes in place for reviewing and analyzing the retention data generated by the BOG. Specifically, staff compared the generated data with internal data to establish the correct cohort population for first-time in college and transfer students. In addition, IPR had processes in place for submitting the appropriate cohort adjustments as permitted by the BOG. We noted that IPR staff obtained data from OUR for deceased students so they could be removed from the cohort. IPR analyzed the degree information in the retention file for the identification of students who were admitted to an Advanced Graduate program, such as Pharmacy or Accounting, without first earning a bachelor's degree.

We randomly selected 15 students in the 2017-2018 Retention file and verified the enrollment records in Campus Solutions. Our review confirmed that the adjustments to the cohort were appropriate as the students were enrolled in a graduate degree program for Pharmacy or Accounting and were not awarded a bachelor's degree. Based on the audit results, we determined there were adequate controls in place over the verification of accuracy on the retention submission.

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 on errors 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 and preeminence metrics. Below is a summary of the resubmissions that occurred during the audit period:

- Retention for 2017-2018 was resubmitted to align the graduation rate with federal reporting (IPEDS) based on the BOG's clarification of cohort adjustments.
- The summer 2018 Admission file was resubmitted due to incomplete reporting of all test scores for applicants. Management explained that the IT staff did not correctly change the programming logic to reflect new the BOG requirement.
- The fall 2018 Admission file was resubmitted to correct a specific student group (PaCE students). Management explained that the data was erroneously generated in the legacy mainframe student system.

Based on management's assertions and our detailed review of these submissions, we determined that the resubmissions were completed for data changes that would have no impact on the university's PBF and preeminence metrics and did not represent potential issues for future submissions as Admissions was migrating to Campus Solutions.

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 2019, there were 48 employees with access to SUDS. The DA and three IPR staff were the only individuals authorized to finalize submissions. In addition, the DA and IPR associate director of Analytic Services 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 generated 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.

General Comment

We wish to express our appreciation to the management and staff of the Office of Institutional Planning and Research, UFIT Enterprise Systems, the Office of the University Registrar, the Office of Admissions, Cost Analysis 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
Lily Ly
Choi Choi

Preeminent Research University Funding Metrics

Metric #	Measure	2019	% over Required
1a	Average GPA <i>An average weighted grade point average of <u>4.0 higher</u> on a 4.0 scale for fall semester incoming freshmen</i>	4.4	10%
1b	Average SAT Score <i>An average SAT score <u>1200 or higher</u> on a 1600-point scale for fall semester incoming freshmen</i>	1355	13%
2	Public University National Ranking <i>A top-50 ranking on <u>at least two</u> well-known and highly respected national public university rankings</i>	10	400%
3	Freshman Retention Rate <i><u>90 percent or higher</u> for full-time, first-time-in-college students</i>	96	7%
4	Four-year Graduation Rate <i><u>60 percent or higher</u> for full-time, first-time-in-college students</i>	67.1	12%
5	National Academic Memberships <i><u>Six or more</u> faculty members at the state university who are members of a national academy</i>	29	383%
6	Science & Engineering Research Expenditures (\$M) <i>Total annual research expenditures, including federal research expenditures, of \$ <u>200 million or more</u></i>	\$831	316%
7	Non-Medical Science & Engineering Research Expenditures (\$M) <i>Total annual research expenditures in diversified nonmedical sciences of \$ <u>150 million or more</u></i>	\$506	237%
8	Number of Broad Disciplines Ranked in Top 100 for Research Expenditures <i>A top-100 university national ranking for research expenditures in <u>five or more</u> science, technology, engineering, or mathematics fields of study</i>	7 of 8	40%
9	Utility Patents Awarded <i><u>One hundred or more</u> total patents awarded by the United States Patent and Trademark Office for the most recent 3-year period</i>	319	219%
10	Doctoral Degrees Awarded Annually <i><u>Four hundred or more</u> doctoral degrees awarded annually</i>	1,627	307%
11	Number of Post-Doctoral Appointees <i><u>Two hundred or more</u> postdoctoral appointees annually</i>	661	231%
12	Endowment Size (\$Millions) <i>An endowment of \$<u>500 million or more</u></i>	\$1,735	247%

PERFORMANCE BASED FUNDING 2019 METRIC DEFINITIONS

Attachment B

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 2019 METRIC DEFINITIONS

Attachment B

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 2019 METRIC DEFINITIONS

Attachment B

BOT Choice Metrics

10a. Percent of R&D Expenditures Funded from External Sources FAMU	<p>This metric reports the amount of research expenditures that was funded from federal, private industry and other (non-state and non-institutional) sources.</p> <p>Source: Accountability Report (Table 6A), National Science Foundation annual survey of Higher Education Research and Development (HERD).</p>
10b. Bachelor's Degrees Awarded to Minorities FAU, FGCU, FIU	<p>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.</p> <p>Source: Accountability Report (Table 4I), State University Database System (SUDS).</p>
10c. National Rank Higher than Predicted by the Financial Resources Ranking Based on U.S. and World News FSU	<p>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.</p> <p>Source: US News and World Report's annual National University rankings.</p>
10d. Percent of Undergraduate Seniors Participating in a Research Course NCF	<p>This metric is based on the percentage of undergraduate seniors who participate in a research course during their senior year.</p> <p>Source: New College of Florida.</p>
10e. Number of Bachelor Degrees Awarded Annually UCF	<p>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.</p> <p>Source: Accountability Report (Table 4G), State University Database System (SUDS).</p>
10f. Number of Licenses/Options Executed Annually UF	<p>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.</p> <p>Source: Accountability Report (Table 6A), University of Florida.</p>
10g. Percent of Undergraduate FTE in Online Courses UNF	<p>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.).</p> <p>Source: Accountability Report (Table 3C), State University Database System (SUDS).</p>
10h. Number of Postdoctoral Appointees USF	<p>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.</p> <p>Source: National Science Foundation/National Institutes of Health annual Survey of Graduate Students and Postdoctorates in Science and Engineering (GSS).</p>
10i. Percentage of Adult Undergraduates Enrolled UWF	<p>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.</p> <p>Source: State University Database System (SUDS).</p>

Performance Based Funding Metric Scores

Metric #	Metric Description	Points	2016-2017	2017-2018	2018-2019	2019-2020
1	Percent of Bachelor's Graduates Enrolled or Employed (earning at least \$25,000) - in the U.S. One Year After Graduation <i>Metric benchmark scale was changed in 2017-2018</i>	Points Received	6	8	9	9
		Maximum Points	10	10	10	10
		Percent of Maximum	60%	80%	90%	90%
2	Median Wages of Bachelor's Graduates Employed Full-time One Year After Graduation <i>Metric calculation and benchmark scale were changed in 2017-2018</i>	Points Received	8	10	10	10
		Maximum Points	10	10	10	10
		Percent of Maximum	80%	100%	100%	100%
3	Cost to the Student - Net Tuition and Fees per 120 credit hours	Points Received	6	8	8	10
		Maximum Points	10	10	10	10
		Percent of Maximum	60%	80%	80%	100%
4	Four Year FTIC Graduation Rate - Percent of first-time-In-college students who graduate within four years <i>Metric change in 2018-2019 from Six Year FTIC Graduation Rate</i>	Points Received	10	10	10	10
		Maximum Points	10	10	10	10
		Percent of Maximum	100%	100%	100%	100%
5	Academic Progress Rate - 2nd Year Retention with GPA Above 2.0	Points Received	10	10	10	10
		Maximum Points	10	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	10	10	10	10
		Maximum Points	10	10	10	10
		Percent of Maximum	100%	100%	100%	100%
7	University Access Rate - Percent of Undergraduates with a Pell-grant <i>Access rate benchmark was changed in 2018-2019 due to Senate Bill 4</i>	Points Received	10	9	6	6
		Maximum Points	10	10	10	10
		Percent of Maximum	100%	90%	60%	60%
8a	Graduate Degrees Awarded within Programs of Strategic Emphasis - as designated by the Board of Governors	Points Received	10	10	10	10
		Maximum Points	10	10	10	10
		Percent of Maximum	100%	100%	100%	100%
9	Percent of Bachelor's Degrees without Excess Hours <i>Metric change in 2018-2019 from Number of Faculty Awards: applies to UF and FSU only</i>	Points Received	5	10	10	10
		Maximum Points	10	10	10	10
		Percent of Maximum	50%	100%	100%	100%
10f	Number of Licenses/Options Executed Annually: applies to UF only <i>Metric was changed in 2017-2018</i>	Points Received	7	10	10	10
		Maximum Points	10	10	10	10
		Percent of Maximum	70%	100%	100%	100%
Note:	Points in red are based on improvement scoring	Total Points Received	82	95	93	95
		Maximum Points	100	100	100	100
		Percent of Maximum	82%	95%	93%	95%



STATE
UNIVERSITY
SYSTEM
of FLORIDA
Board of Governors

Data Integrity Certification

March 2020

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 **significant or material** audit findings.

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 and Preeminence or Emerging Preeminence Status.	<input type="checkbox"/>	<input type="checkbox"/>	
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.	<input type="checkbox"/>	<input type="checkbox"/>	
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.	<input type="checkbox"/>	<input type="checkbox"/>	
4. In accordance with Board of Governors Regulation 3.007, my university shall provide accurate data to the Board of Governors Office.	<input type="checkbox"/>	<input type="checkbox"/>	
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.	<input type="checkbox"/>	<input type="checkbox"/>	

Data Integrity Certification

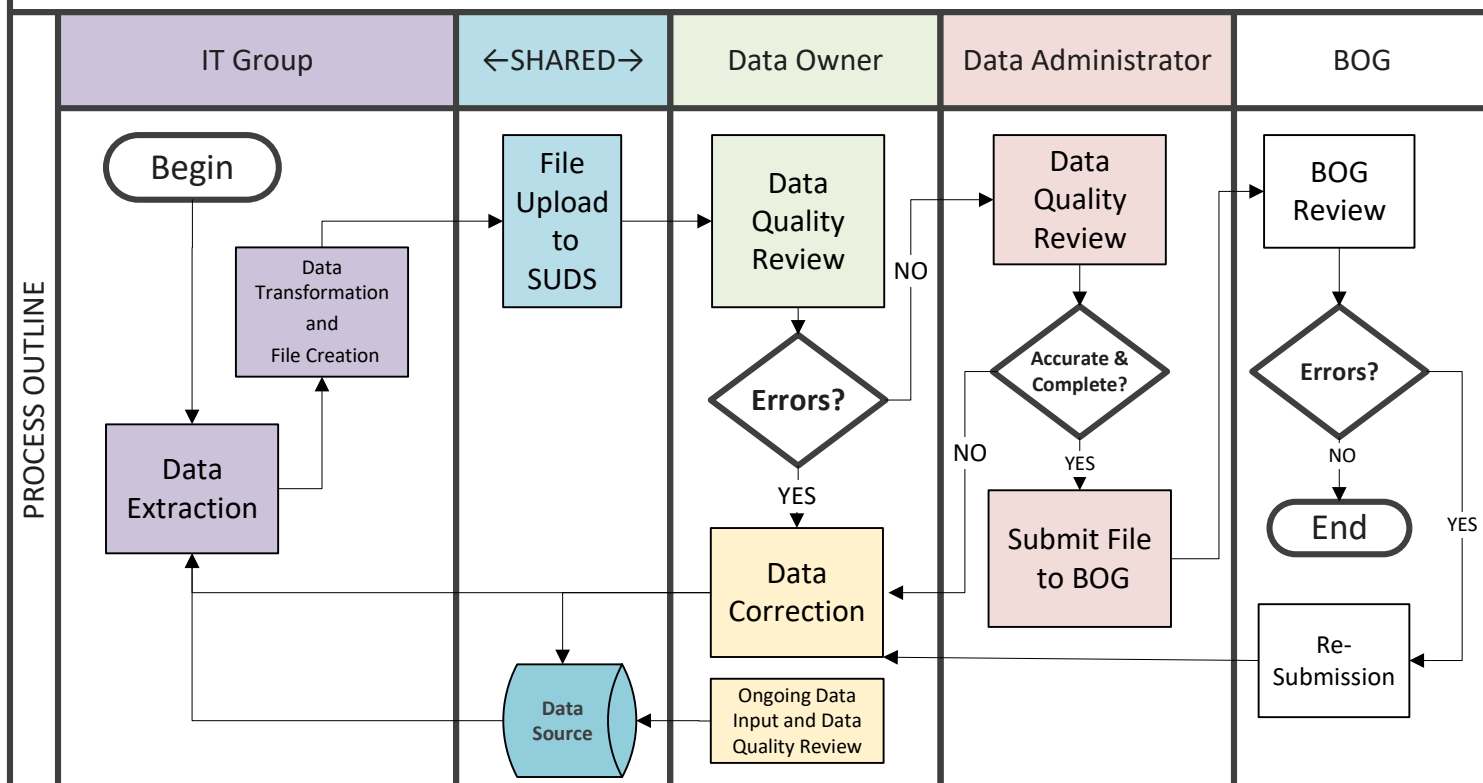
Data Integrity Certification Representations			
Representations	Yes	No	Comment / Reference
6. In accordance with Board of Governors Regulation 3.007, I have tasked my Data Administrator to ensure the data file (prior to submission) is consistent with the criteria established by the Board of Governors Data Committee. The due diligence includes performing tests on the file using applications, processes, and data definitions provided by the Board Office.	<input type="checkbox"/>	<input type="checkbox"/>	
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.	<input type="checkbox"/>	<input type="checkbox"/>	
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.	<input type="checkbox"/>	<input type="checkbox"/>	
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."	<input type="checkbox"/>	<input type="checkbox"/>	
10. I am responsible for taking timely and appropriate preventive/ corrective actions for deficiencies noted through reviews, audits, and investigations.	<input type="checkbox"/>	<input type="checkbox"/>	
11. 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.	<input type="checkbox"/>	<input type="checkbox"/>	

Data Integrity Certification

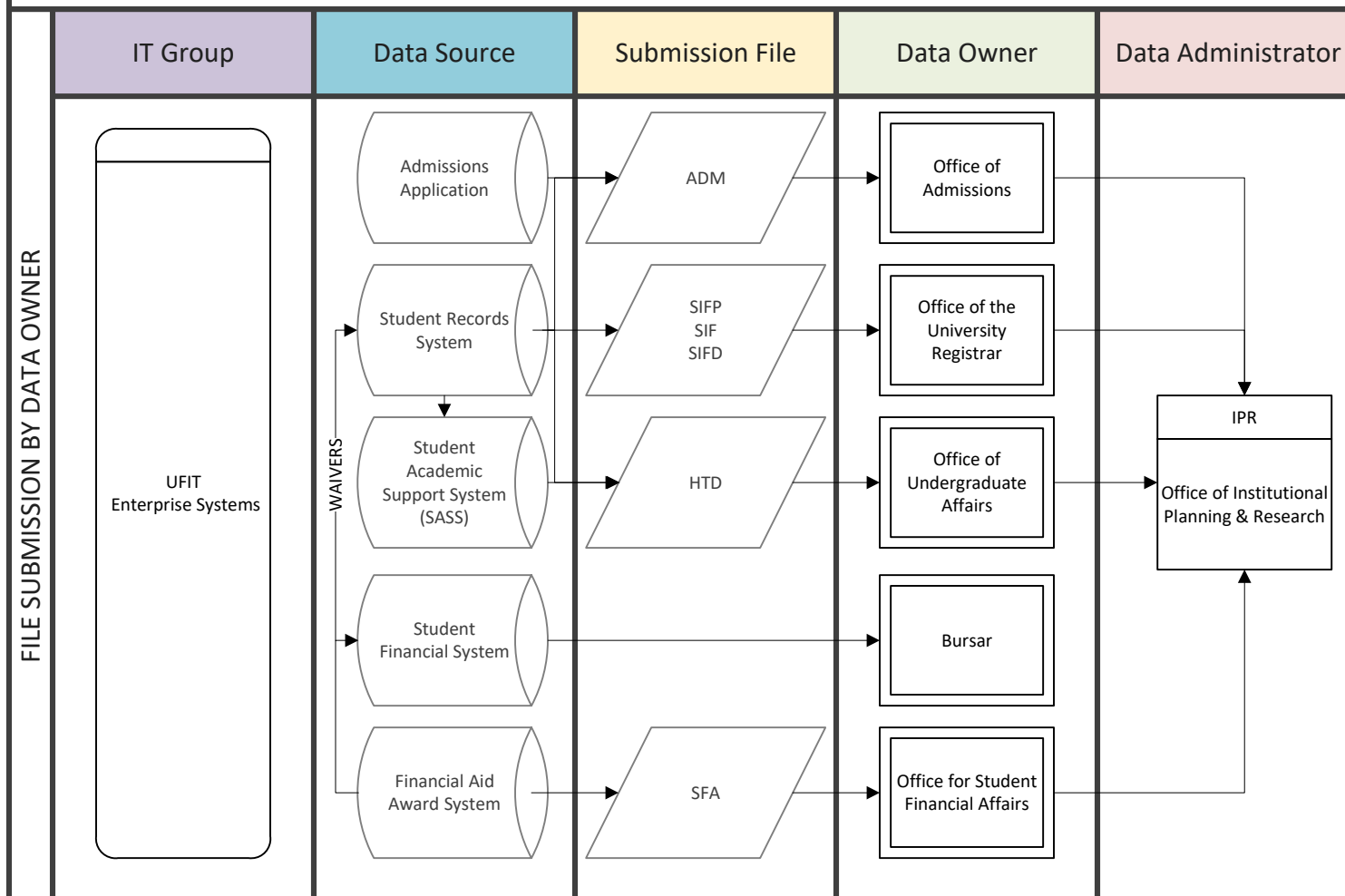
Data Integrity Certification Representations			
Representations	Yes	No	Comment / Reference
12. I certify that I agreed to the scope of work for the Performance Based Funding Data Integrity Audit and the Preeminence or Emerging Preeminence Data Integrity Audit (if applicable) conducted by my chief audit executive.	<input type="checkbox"/>	<input type="checkbox"/>	
13. 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.	<input type="checkbox"/>	<input type="checkbox"/>	

Data Integrity Certification Representations, Signatures
<p>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.</p> <p>Certification: _____ Date _____</p> <p style="text-align: center;">President</p>
<p>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.</p> <p>Certification: _____ Date _____</p> <p style="text-align: center;">Board of Trustees Chair</p>

Overview of the University SUDS Submission Data & Process Flows



Data Flow by Owner





Office of the Provost and Senior Vice President

235 Tigert Hall
PO Box 113175
Gainesville, FL 32611-3175
352-392-2404 Tel
352-392-8735 Fax

November 19, 2019

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, 2019. I have reviewed the substance of that report in a meeting with Joe Canella and the audit staff in an exit meeting on November 7, 2019.

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,

A handwritten signature in black ink that reads "Joseph Glover". The signature is written in a cursive, flowing style.

Joseph Glover
Provost and Senior Vice President for Academic Affairs



STATE
UNIVERSITY
SYSTEM
of FLORIDA
Board of Governors

Data Integrity Certification

March 2020

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 **significant or material** audit findings.

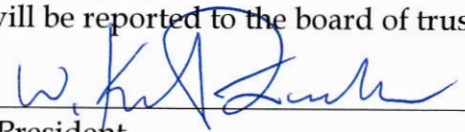
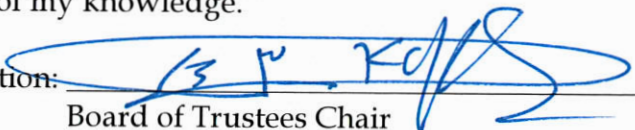
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2. These internal controls and monitoring activities include, but are not limited to, reliable processes, controls, and procedures designed to ensure that data required in reports filed with my Board of Trustees and the Board of Governors are recorded, processed, summarized, and reported in a manner which ensures its accuracy and completeness.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
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Data Integrity Certification

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Data Integrity Certification Representations, Signatures	
<p>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.</p>	
<p>Certification: <u></u> President</p>	<p>Date: <u>12-4-2019</u></p>
<p>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.</p>	
<p>Certification: <u></u> Board of Trustees Chair</p>	<p>Date: <u>12-6-2019</u></p>