Final Internal Audit Report 2019.01

FY19 Performance Based Funding Data Integrity

Issued to:
Audit and Compliance Committee:
Paul McElroy, Doug Burnett, Tom Bryan,
Oscar Munoz, Hans Tanzler, Sharon Wamble-
King, Kevin Hyde (ex-officio)

President: David Szymanski

Vice Presidents: Jay Coleman, Pam Chally,
Shari Shuman

Abby Willcox, Director Institutional Research
Jeff Durfee, Director IT Networking
Shawn Brayton, Director of Academic
Programs

Issued by:
Julia Hann, Chief Audit
Executive

Lead Auditor:
Khareem Gordon, IT
Internal Auditor

Table of Contents

The Swoop

Executive Summary

The University of North Florida (UNF), established in 1972, has gained national recognition for its quality, service, and signature emphasis on *Transformational Learning Opportunities* for students. The student population has grown to approximately 16,000, and the University has six colleges: Education and Human Services; Business; Health; Arts & Sciences; Honors; and Computing, Engineering, and Construction.

The integrity of data provided to the Florida Board of Governors (BOG) is critical to the performance-based funding (PBF) decision-making process. To provide assurance that the data submitted for this process is reliable, accurate, and complete, in 2014 the BOG developed a Data Integrity Certification process. University presidents and boards of trustees are required to execute a Data Integrity Certification affirmatively certifying each representation. The audit is to be conducted in accordance with professional auditing standards and is to be submitted to the Board of Governors for their annual meeting in March. The audit results provide the basis for the president's and the chair's certification.

This is the fifth iteration of the Performance Based Funding audit to support the data certification representations. Data integrity controls are embedded within key university processes. This year we focused on improving data integrity controls and ensuring controls are commensurate to risks inherent to maintaining data integrity. We categorize the overall residual risk ranking as *low* (Appendix I) because corrective action to address these observations are opportunities to further control the integrity of the data.

Summary of Recommendations

The Office of Internal Auditing's (OIA) mission is to provide an independent objective assurance and consulting activity which adds value and helps improve operations. Ensuring the integrity of data submitted to the BOG requires a holistic approach that involves many areas and technological controls. We identified two (2) "*Osprey Opportunities*" to address *minor* risk and will add best practices to further strengthen internal controls for ensuring data integrity. The rating scale is described in detail in **Appendix I** – Report and Item Ranking Scale. We used guidance from the Department of Education, best practices from the National Institute of Standards and Technology, and from ISACA. The recommendations below will make incremental improvements to the university's internal controls for ensuring data integrity. These items are discussed in detail in the **Observations and Recommendations** section of the report.

The Office of Internal Auditing recommends:

1. Consider additional controls to ensure the integrity and confidentiality of data submitted to the BOG.
2. Continue to clarify the approval status of programs exceeding 120 credit hours or reduce credit hours, where warranted.

Background, Objectives, and Scope

The Performance Based Funding Data Integrity Audit is required annually by the Board of Governors (BOG) and was part of the fiscal year 2019 risk-based audit plan approved by the University president and the board of trustees.

The Performance Based Funding Model was approved by the BOG in January 2014 and has incentivized universities and their boards of trustees to achieve excellence and performance improvements in key areas aligned to the State University System (SUS) Strategic Plan goals. Over the years, there have been several changes to the model. Most recently, in March 2018, Senate Bill 4 was signed into law requiring the inclusion of a 4-year, rather than a 6-year, graduation rate in the Performance Funding Model.

The Performance Funding Model includes 10 metrics used to evaluate the institutions on a range of issues. Two of the 10 metrics are choice metrics; one picked by the Board and another by the university's board of trustees. Appendix II defines the data submission files while Appendix III defines the metrics.

The Office of Institutional Research (IR) performs the University's data administration function by producing or coordinating all official data reports and electronic files submitted to federal, state, regional, and local agencies. IR has a director, an assistant director, a senior analyst, two analysts, a programmer analyst, and an office manager. IR is involved actively in the following committees: Data Governance, Student Records, and Advising Steering Committees. The president appointed the director of IR as the institutional data administrator to certify and to manage the submission of data to the BOG.

Data integrity controls exist throughout many of the University's data collecting, processing, and reporting processes. This year's audit is the fifth iteration of the Performance Based Funding audit. It is noted management has made several improvements, outlined below, to the internal controls over data integrity.

Accomplishments:	Description:
1. Data Governance Committee	The Data Governance Committee is actively involved in emerging data governance issues.
2. Data Cookbook implementation	A business dictionary that contains the definitions of key data terms.
3. Process Documentation	The reporting process is being documented.
4. Timeliness of file submissions	Most files were submitted on time.
5. Data Owner Reviews	Data owners review file submissions.
6. Access Reviews	Data owners review, periodically, who has access to their data, ensuring a need-to-know standard.
7. Audit Logs	ITS implemented access logs to track activity on PBF files.
8. Automated reports	Automated reports to identify potential problems records.
9. Automated student records cleanup	Automated jobs which perform limited cleanup of student records to ensure accuracy.
10. Encryption	The hard drives of computers used by IR employees are being encrypted.

The objectives of the audit were to:

1. Determine whether the University has adequate controls in place to ensure the completeness, accuracy, and timeliness of data submissions to the BOG, which support the Performance Based Funding metrics;
2. Provide an objective basis of support for the president and board of trustees chair to sign the required representations in the Performance Based Funding - Data Integrity Certification which will be filed with the BOG on or before March 1, 2019;
3. Identify improvements in critical data collection processes supporting high risk metrics;
4. Follow up on the implementation of corrective action plans reported in the prior audit.

The scope of the audit included policies, procedures, and processes that support maintaining the integrity of data submitted to the Board of Governors for the Performance Based Metrics. We performed detailed testing on the Student Instruction File (SIF) and the Student Financial Aid (SFA). We selected the SIF and the SFA files because of the impact on the metrics. We tested other files during previous audit periods.

We compiled a list of data elements for the selected data files and identified business processes which are critical in the data lifecycle. We reviewed five business processes related to the metrics listed as having higher audit risk and lower scoring metrics:

1. Admissions,
2. Registration,
3. Grade Submissions,
4. Excess Hours,
5. Undergraduate Advising.

We conducted employee interviews, performed process walkthroughs, analytical reviews, and evaluated risks in the processes and its impact on each metric. Our observations and recommended process improvements for the business process reviews will be issued in a separate consulting memo.

The audit fieldwork started on September 24, 2018 and ended in December 13, 2018. We used several control frameworks to identify and to evaluate the data integrity controls at various points in the data lifecycle. We evaluated controls by using the National Institute of Standards and Technology (NIST) Cybersecurity Framework and the Control Objectives for Information and Related Technologies (COBIT) 5 Framework. The use of these frameworks is important to providing objective assurance as required in representations 1, 2, 3, and 4 of the Data Integrity Certification.

We conducted the audit in accordance with the International Standards for the Professional Practice of Internal Auditing published by the Institute of Internal Auditors (IIA), the Professional Practices Framework for IS Audit/Assurance and the IS Standards, Guidelines, and Procedures for Auditing Professionals issued by the Information Systems Audit and Control Association (ISACA), and the professional code of the International Information System Security Certification Consortium (ISC[2]).

Observations and Recommendations

Observation #1 Information Technology Controls
Osprey Opportunity
Minor Risk

UNF collects, stores, uses, and shares Family Educational Rights and Privacy Act (FERPA) protected data which includes personally identifiable information. The data submitted to the BOG is FERPA protected data and is uploaded via an encrypted connection to ensure integrity of the submission process.

The University's data classification policy states that restricted data, such as FERPA protected data, should be protected according to best practices. Best practices, such as NIST Cybersecurity Framework, list several controls that can be used to ensure data integrity.

Criteria
BOG Regulation 3.0075, Security of Data and Related Information Technology Resources, recommends policies and procedures regarding access control and transmission of sensitive/confidential data.

UNF policy 6.0220P, Data Classification Policy for restricted data, states restricted data is information protected by statutes, regulations, University policies or contractual language e.g. FERPA protected data.

Risk
Data integrity risks may increase without additional controls.

Cause
ITS is currently researching feasibility of additional controls in IR's IT environment.

Recommendation
Consider additional controls for FERPA protected student data in the IR environment.

Management Response
Institutional Research (IR) will submit a request to Information Technology Services (ITS) to have additional controls on department desktop and laptop computers subject to the feasibility of those controls. Please note all newer workstations at UNF are being deployed with additional controls. We anticipate that this will be completed prior to the end of January 2019.

UNF currently utilizes the following controls on networks and databases:

- Access controls at the workstation, database and network levels
- Network security (e.g. firewall, IPS, segmentation)
- Workstation security (e.g. antivirus, access controls)

Observation #2 Excess Hours
Osprey Opportunity
Minor Risk

During the audit, we learned the BOG has a process to approve bachelor's degree programs exceeding 120 credit hours by a university. As of Fall 2018, UNF had approval from the BOG for nine disciplines to require more than 120 credit hours. However, there are three additional programs at UNF exceeding 120 credit hours which the SUS BOG has not approved excess hours. We learned these programs are currently being vetted at the college level and through the University's Academic Program Committee (APC) approval process to reduce program requirements to 120 credit hours. The purpose of APC is to review curricular proposals for the creation, deletion, or modification of academic programs and courses.

Lastly, a third program within Sign Language Interpretation and Translation was added to the degree program inventory file by the BOG in fall 2007. In July 2007 notification included the new program design that allowed students at five Florida Community Colleges with interpreter training programs to bridge into a 4-year bachelor's program requiring 135 credit hours. UNF understood the program to be approved at 135 credit hours. However, in fall 2018, it was learned evidence of approval could not be located even though it is listed in the degree program inventory file.

Criteria
BOG Methodology and Procedures for *Percent of Bachelor's Degrees Awarded Without Excess Hours*, states in part "in accordance with the requirements of Section 1007.25(8), F.S., and Board regulation 8.014, the Board of Governors may approve a request by a university board of trustees for a bachelor's degree program to exceed 120 credit hours to degree."

Risk
Programs exceeding 120 credit hours without documented approval from the BOG may impact metrics calculations.

Cause
Through leadership transitions the college has worked to reduce program offerings to 120 credit hours. The Sign Language Interpretation and Translation discipline was unaware BOG documented approval was not on file.

Recommendation
We recommend the University continue to clarify the approval status of programs exceeding 120 credit hours or reduce credit hours, where warranted.

Management Response
The three Science Teacher Education programs (CIP 13.1205)—Biology, Chemistry, and Physics—have been revised, vetted, and approved via faculty governance curriculum procedures. Effective fall 2019, all Science Teacher Education programs will have an approved program length of 120 semester hours. The English Teacher Education program (CIP 13.1205) is currently undergoing the vetting and approval processes via faculty governance curriculum procedures. Academic Affairs anticipates approval of the program length reduction in early 2019.

The Mathematics Teacher Education (CIP 13.1311) program faculty were first advised to seek changes to the statewide common prerequisites. The request was denied at the state level and the Board of Governors recommended seeking approval to exceed 120 semester hours. The faculty prepared the necessary paperwork to request an exception to 120 semester hour program length, however, a decision was made by the dean and Provost to revise the curriculum to a program length of 120 semester hours. The reduction in program length is in the process of being vetted via faculty governance curriculum procedures and is expected to be approved by Faculty Association at its January 2019 meeting.

Academic Affairs will continue to monitor the faculty governance of curriculum processes for reducing the program length for the English Teacher Education and Mathematics Teacher Education programs.

With respect to ASL/English Interpreting (CIP 16.1603), the Associate of Science (AS) to Bachelor of Science (BS) program was approved by UNF's Board of Trustees in 2007 as a 135 semester hour degree program developed between UNF and FSCJ. After searching archives neither the Board of Governors nor UNF's President's Office have evidence stipulating Board of Governors' acceptance of UNF's program at 135 semester hours. In 2012 and 2014, the Board of Governors conducted an evaluation to ensure alignment of catalog hours to degree hours reported in the HTD file. The program was not listed on the 2012 audit however, it was listed on the 2014 audit. UNF provided a response to the 2014 audit to clarify the status of the program and that its program length was 135 semester hours. Board of Governors staff accepted UNF's response and did not request any further information. To this end, UNF thought the program length issue had been resolved and that no further action was required.

For CIP Codes where UNF is approved to offer a bachelor's degree in the discipline over 120 hours, college and department leadership will explore the feasibility of revising curriculum requirements to require less hours where appropriate with continued compliance with discipline specific accrediting bodies and industry best practices. For example, the Elementary Education (CIP 13.1202) is seeking to reduce the program length from the BOG approved 126 semester hours to 120 semester hours. The request is currently being vetted via faculty governance of curriculum procedures and is expected to be approved by Faculty Association at its January 2019 meeting.

Appendix I

Report and Item Ranking Scale

Overall Report Residual Risk Ranking

- **Low**
    - The internal control system scoped within the audit is functioning satisfactorily and remaining operating risks are low.
    - The collective audit issues are considered minor deficiencies.
    - Related corrective action need only be addressed to improve current operations.

- **Moderate**
    - The internal control system scoped within the audit is functioning in a manner that provides reasonable assurance that most major risks will be mitigated.
    - Corrective action to address the audit issues may not be critical to the university's business operations as a whole but should be addressed to minimize financial, reputational, operational and strategic risks.

- **High**
    - The internal control system scoped within the audit needs major improvement.
    - The deficiencies identified could significantly impair operations.
    - If corrective action is not implemented timely, issues may escalate to cause critical financial, reputational, operational or strategic risks.
    - Corrective action plans should be given a priority.

Reportable Item Ranking Scale

- **Minor Risk [*Osprey Opportunity*]**
    - Observation reportable to address a nominal risk.
    - Recommendations provide opportunities for improvement.
    - Minor violations of procedures, rules, or regulations.
    - Routine administration attention requested.
    - Corrective action strongly recommended to improve quality or processes of area being audited.

- **Notable Risk**
    - Significant observation reportable to address an increased risk.
    - Multiple violations of policies and procedures, and/or weak internal controls.
    - Important opportunity to improve effectiveness and efficiency.
    - Corrective action required.

- **Critical Risk**
    - Major observation reportable due to a critical risk to the university.
    - Material violation of policies/procedures/laws, and/or unacceptable internal controls, and/or high risk for fraud/waste/abuse, and/or major opportunity to improve effectiveness and efficiency.
    - Material risk identified. Immediate corrective action required.

Appendix II

Data Files

Metric	Description	Submitted Data File Name	Data Used/Created by BOG	Functional Data User
1	Percent of Bachelor's Graduates Employed Full-Time in Florida or Continuing Education in U.S. one year after Graduation	SIFP, SIF, SIFD	Accountability Report (table 4O), National Student Clearinghouse (NSC), Florida Education and Training Placement Information Program (FETPIP) analysis of Wage Record Interchange System (WRIS2), and Federal Employment Data Exchange (FEDES)	Registrar
2	Median Wages of Bachelor's Graduates Employed Full-Time in Florida one year after Graduation	SIFP, SIF, SIFD	Accountability Report (table 4O), FETPIP, WRIS2, FEDES, and NSC	Registrar
3	Cost to the Student: Net Tuition & Fees per 120 Credit Hours	HTD, SFA, SIF	Accountability Report (Table 1D)	Registrar
4	Six Year Graduation Rate FTIC (first time in college) Students	SIF, SIFP, SIFD, RET	Accountability Report (Table 4D)	Registrar
5	Academic Progress Rate	SIF, RET	Accountability Report (Table 4B)	Registrar
6	Bachelor's Degrees Awarded in Areas of Strategic Emphasis (includes STEM)	SIFD	Accountability Report (Table 4H)	Registrar
7	University Access Rate	SFA, SIF	Accountability Report (Table 3E)	Financial Aid, Registrar
8	Graduate Degrees Awarded in Areas of Strategic Emphasis (includes Stem)	SIFD	Accountability Report (Table 5C)	Registrar
9	BOG Choice: Percent of Bachelor's Degrees Without Excess Hours	HTD	Accountability Report (Table 4J)	Registrar
10	BOT Choice: Undergraduate FTE Enrollments in Online Courses	SIF	Accountability Report (Table 3C)	Registrar

SIFP = Student Instruction File – Preliminary
SIF = Student Instruction File
SIFD = Student Instruction File – Degrees Awarded
HTD = Hours to Degree

RET = Retention File
SFA = Student Financial Aid

Appendix III
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 require 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).

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).

BOT Choice Metric

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).

Performance Based Funding
March 2019 Data Integrity Certification

STATE UNIVERSITY SYSTEM *of* **FLORIDA**
Board of Governors

University Name: <u>University of North Florida</u>

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.

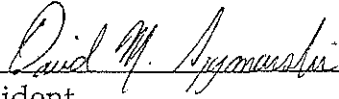| Performance Based Funding Data Integrity Certification Representations			
Representations	Yes	No	Comment / Reference
1. I am responsible for establishing and maintaining, and have established and maintained, effective internal controls and monitoring over my university's collection and reporting of 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: _David M. Armstrong_   Date _1/4/19_
      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 _1/17/19_
      Board of Trustees Chair