

EXECUTIVE SUMMARY

We audited Performance Funding Metrics as of October 31, 2016. This audit is included in our 2016/17 audit work plan, as determined by our annual risk assessment. Our objectives were to:

- Verify the appointment of the Data Administrator by the UWF President.
- Evaluate the processes used by the Data Administrator and data custodians to ensure the completeness, and accuracy of submission of data to the Board of Governors (BOG).
- Verify timely submissions of data files to the Florida Board of Governors.
- Evaluate system access controls and user privileges to ensure they are properly assigned and periodically reviewed.
- Assess the consistency of data submissions with the data definitions and guidance provided by the BOG.
- Evaluate the accuracy of the data collected and data files submitted.
- Confirm the report and explanation to the BOG of all critical data errors.

Audit fieldwork began on August 8, 2016, and ended on January 9, 2017. Our audit was conducted in accordance with the Institute of Internal Auditors International Standards for the Professional Practice of Internal Auditing and generally accepted auditing principles.

BACKGROUND

The Florida Board of Governors (BOG) has broad governance responsibilities affecting administrative and budgetary matters for Florida's 12 public universities. Beginning in fiscal year 2013-14, the BOG instituted a performance funding program that is based on 10 performance metrics. These metrics are used to evaluate the institutions on a range of issues including graduation rates, job placement, cost per degree, and retention rates, among other things.

On April 14, 2016, the Governor of Florida signed a new 100-point BOG performance-based funding model into

law. The same metrics are in place, but the scoring of the metrics has been revised.

Since the model was first introduced in 2014, student graduation and retention rates have been on the rise, with Florida boasting the highest graduation rates of the 10 largest states. The number of undergraduate STEM degrees is also up by 30 percent in the past five years, and the number of graduate STEM degrees is up 17 percent.

PRIOR AUDIT

An audit of the University Performance Metrics was performed in 2015 with the report issued on December 14, 2015. This audit found two opportunities for improvement:

1. The GPA calculation reported on the BOG metrics data file was inaccurate.
2. Two data file resubmissions to the BOG occurred during our audit as a result of misinterpretation and miscommunication.
 - The Student Instruction File was found to be in error for three reporting periods.
 - The expenses for the Florida Virtual Campus (FLVC) were miscoded in the Operating Budget file used to compute the Cost to Degree.

All findings have been fully rectified.

NOTABLE STRENGTHS

The UWF Data Administrator (DA) in coordination with other State of Florida University data administrators formed a Council of Data Administrators (CODA), in which the UWF DA is the chairperson. CODA's Vision Statement asserts: CODA exists to promote and ensure that reliable and consistent data are used and reported by State University System of Florida (SUS) institutions for current and future information-based decisions.

It is especially valuable for UWF to have the DA in a leadership role in the group. This keeps the University

better informed of any issues and changes to metric data reporting.

KEY OBSERVATIONS

Overall, internal controls over the completeness, accuracy, and timeliness of data submissions to the BOG appear sound. The audit revealed one opportunity for improvement:

The number of Banner¹ users who have access to view and change student Social Security Numbers (SSNs) is unreasonably high.

SUGGESTED MANAGEMENT ACTIONS

- Department Security Managers should review Banner authorizations to ensure that only staff members with duties that require the ability to view and edit SSNs have this ability.

CONCLUSION

Based on our audit, we have concluded that the controls and processes UWF has in place to ensure the completeness, accuracy and timely submission of data to the BOG in support of performance based funding are adequate. Further, we believe that our audit can be relied upon by the University Board of Trustees and President as a basis for certifying the representations made to the BOG related to the integrity of data required for its performance based funding model.

We appreciate the cooperation, professionalism and responsiveness of the staff who were involved in the audit.

Respectfully submitted,

Betsy Bowers, CIA, CFE, CGFM, CICA, CRMA
Associate Vice President
Internal Auditing & Compliance

Audit performed by: Dan Bevil, CICA

¹ Banner is UWF's Enterprise Resource Planning application.

REPORT PROVIDED TO THE FOLLOWING:

Dr. Martha Saunders, President
Dr. George Ellenberg, Interim Provost/Vice President of Academic Affairs
Dr. Joffery Gaymon, Associate Vice President, Enrollment Affairs
Dr. Steven Cunningham, Vice President Finance and Administration Division/CFO
Dr. Michael White, Director Institutional Effectiveness, ASPIRE
Mort O'Sullivan, Chair BOT
Richard Baker, Chair BOT Audit & Compliance Committee
Bob Jones, BOT Audit & Compliance Committee
Greg Britton, BOT Audit & Compliance Committee
James Felder, Interim General Counsel
Keith King, Associate Director of Institutional Research
Melanie Haveard, Executive Director and CTO, Information Technology Services
Shelly Blake, Director of Budgets, Academic Affairs
Christine Dillard, Assistant Director, Human Resources
Jim Stultz, Manager, FL Auditor General
Ken Danley, Supervisor, FL Auditor General
Jaime Hoelscher, Audit Supervisor, FL Auditor General
Joe Maleszewski, BOG Chief Inspector General
Lori Clark, BOG Compliance and Audit Specialist
Rebecca Luntsford, BOT Liaison





University of
West Florida

*Internal Auditing & Compliance
Audit: Performance Funding Data
Integrity - 2016
Report #: UWF16-17_002
Date: January 24, 2017*

**OBSERVATIONS
WITH
MANAGEMENT'S
RESPONSES**

**Performance
Funding Data
Integrity-2016
UWF 16-17_002**

OBSERVATION WITH MANAGEMENT RESPONSE

What We Found	Forty-three (43) staff members have made changes to SSNs since the implementation of Banner in the fall of 2004, eighty (80) people currently have access to do so, including one Federal Work Study student. An unreasonable amount of Banner users have access to see and change SSNs.
Why the Issue is Important	<p>Limiting access to sensitive data can reduce the risk of stolen private information and provides the basis for segregation of duties.</p> <p>According to UWF procedures set forth in Confluence regarding Reviewing, Verifying and Affirming Banner Access Privileges, this periodic review <i>“is necessary to ensure that employees have Banner access appropriate to their job functions, and that this access is kept current as employee roles and job responsibilities change. It is also necessary that employees maintain a reasonable separation of duties to prevent situations which create a conflict of interest.”</i></p>
What is Causing the Issue	Staff members are typically provided with the default access to Banner that requires intervention to remove this access in accordance with the user’s job duties.
What is Expected or Required	  Banner users should have access to data based on the “least privilege” principle.
What We Suggest	Access should be reviewed and updated according to the needs of the department and staff.
Responsible Auditees	<p>Dr. George Ellenberg, Interim Provost, VP, Academic Affairs</p> <p>Dr. Steve Cunningham, Vice President, Finance and Administration</p>
Action Management Commits To	The Office of Enrollment Affairs acknowledges that more regular and formal review should be performed in regards to faculty, staff and student employees that have been granted access to the Banner General Person Identification form ² . Each office was provided with a list of staff members with access to update the SSN field. Because of internal protocols within each office, many staff members with

² This General Person Identification form within Banner is called SPAIDEN.



access do not appear to have touched the SSN field. Of the 80 staff members, 29 no longer need the same level access. Based on job functionality, 51 staff members are appropriately assigned access.

The Office of the Registrar will work with ITS to have a Banner Tableau report requested that shows changes made to the SSN field in SPAIDEN to include user names and date change made. The Office of the Registrar and Office of Undergraduate Admissions (the two primary offices that grant access to this form) will review the user names and changes to ensure that only appropriate/approved staff are making updates. Both Admissions and Registrar Banner security roles that grant access to SPAIDEN and the SSN field, will also be reviewed to ensure they are appropriately assigned based on job functions. The new report and review process will be fully implemented by April 28, 2017. The report will be reconciled and saved on a quarterly basis.

Implementation Date

April 28, 2017



Performance Based Funding

March 2017 Data Integrity Certification

Name of University: University of West Florida

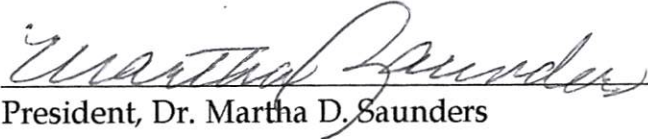

INSTRUCTIONS: Please respond "Yes" or "No" for each representation below. Explain any "No" responses to ensure clarity of the representation you are making to the Board of Governors. Modify representations to reflect any noted audit findings.

Performance Based Funding Data Integrity Certification Representations			
Representations	Yes	No	Comment / Reference
1. I am responsible for establishing and maintaining, and have established and maintained, effective internal controls and monitoring over my university's collection and reporting of data submitted to the Board of Governors Office which will be used by the Board of Governors in Performance Based Funding decision-making.	<input checked="" 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 checked="" type="checkbox"/>	<input type="checkbox"/>	
3. In accordance with Board of Governors Regulation 1.001(3), 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 checked="" 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 checked="" 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 checked="" type="checkbox"/>	<input type="checkbox"/>	
6. In accordance with Board of Governors Regulation 3.007, I have tasked	<input checked="" type="checkbox"/>	<input type="checkbox"/>	

Performance Based Funding Data Integrity Certification

Performance Based Funding Data Integrity Certification Representations			
Representations	Yes	No	Comment / Reference
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 of Governors Information Resource Management (IRM) 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 checked="" 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 checked="" 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 checked="" 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 checked="" type="checkbox"/>	<input type="checkbox"/>	
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.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	

Performance Based Funding Data Integrity Certification

Performance Based Funding Data Integrity Certification Representations			
Representations	Yes	No	Comment / Reference
<p>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.</p>			
<p>Certification: <u></u> Date <u>2/21/17</u></p> <p style="margin-left: 40px;">President, Dr. Martha D. Saunders</p>			
<p>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.</p>			
<p>Certification: <u></u> Date <u>2/21/17</u></p> <p style="margin-left: 40px;">Board of Trustees Chair, Mort O'Sullivan</p>			