FLORIDA ATLANTIC UNIVERSITY™

Office of Inspector General

Audit Report: *Performance Based Funding Data Integrity*

As of October 31, 2018

BOCA RATON • DANIA BEACH • DAVIE • FORT LAUDERDALE • JUPITER • PORT ST. LUCIE

REPORT ON THE AUDIT OF
PERFORMANCE BASED FUNDING DATA INTEGRITY

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2018 Performance-Based Funding Model
Final Metric Score Sheet

Scores in black are based on Excellence.   Scores in orange are based on Improvement.

Metric	FAMU	FAU	FGCU	FIU	FSU	NCF	UCF	UF	UNF	USF	UWF
1	7	8	8	7	7	10	7	9	8	8	6
2	6	9	9	9	8	4	9	10	8	8	8
3	10	10	7	10	10	10	2	8	1	6	10
4	5	3	2	10	10	10	5	10	1	10	6
5	3	7	4	10	10	1	7	10	4	6	7
6	7	10	10	9	7	10	10	10	10	10	10
7	10	9	7	10	6	6	9	6	7	9	9
8.a	9	10	10	9	8		10	10	9	10	10
8.b						4					
9	5	8	8	6	10	10	8	10	10	9	10
10.a	10										
10.b		10	10	10							
10.c					10						
10.d					10						
10.e							10				
10.f								10			
10.g									10		
10.h										10	
10.i											10
Total Score	72	84	75	90	86	75	77	93	68	86	86

Metric 1 - Percent of Bachelor's Graduates Employed and/or Continuing their Education Further 1 Yr after Graduation
Metric 2 - Median Average Wages of Undergraduates Employed 1 Yr after Graduation
Metric 3 - Net Tuition & Fees per 120 Credit Hours
Metric 4 - Four Year Graduation Rates (Full-time FTIC)
Metric 5 - Academic Progress Rate (2nd Year Retention with GPA above 2.0)
Metric 6 - Bachelor's Degrees Awarded in Areas of Strategic Emphasis (includes STEM)
Metric 7 - University Access Rate (Percent of Undergraduates with a Pell Grant)
Metric 8a - Graduate Degrees Awarded in Areas of Strategic Emphasis (includes STEM)
Metric 8b - Freshman in Top 10% of Graduating High School Class
Metric 9 - Board of Governors' Choice (see detailed sheets)
Metric 10 - Board of Trustees' Choice (see detailed sheets)

FAU
FLORIDA ATLANTIC UNIVERSITY

MEMORANDUM

TO: Dr. John Kelly
            President

FROM: Morley Barnett
            Inspector General

DATE: December 12, 2018

SUBJ: PERFORMANCE BASED FUNDING DATA INTEGRITY AUDIT

In accordance with the University's Internal Audit Plan for fiscal year 2018-19, and at the request of the Florida Board of Governors (BOG), we have conducted an audit of the processes and controls that Florida Atlantic University has in place related to data submissions in support of the BOG performance based funding metrics as of October 31, 2018. The report contained herein presents our scope and objectives and provides comments and conclusions resulting from procedures performed.

Please call me if you have any questions.

cc: University Provost
            Vice Presidents
            University Chief Information Officer
            University Data Administrator
            FAU Board of Trustees
            Inspector General, Florida Board of Governors
            Florida Auditor General

Executive Summary

In accordance with the University's Internal Audit Plan for fiscal year 2018-19, and at the request of the Florida Board of Governors (BOG), we have conducted an audit of the University's processes and controls which support data submitted to the BOG for its performance based funding (PBF) metrics. This audit was part of a system-wide examination of data integrity based on data due to be submitted to the BOG as of October 31, 2018.

The primary objectives of this audit were to:

- Evaluate controls and processes established by the Office of Institutional Effectiveness and Analysis and primary data custodians to ensure completeness, accuracy, and timeliness of data submitted to the BOG; and,

- Provide a reasonable basis of support for the Performance Based Funding Data Integrity Certification statement which is required to be signed by the University president and Board of Trustees chair.

Audit procedures included, but were not limited to, the evaluation of internal controls as those controls relate to the accomplishment of the foregoing audit objectives, as well as limited compliance testing of data elements comprising the *Degrees Awarded* and *Student Financial Aid* data files which are used in computations for Metrics 4 and 7 of the BOG performance based funding model.

Based on our observations and tests performed, we are of the opinion that the University's processes and internal controls for data compilation and reporting to the BOG are adequate. There were no findings or recommendations as a result of this audit.

December 12, 2018

Dr. John Kelly
President
Florida Atlantic University
Boca Raton, Florida

Dear President Kelly:

SCOPE AND OBJECTIVES

At the request of the Florida Board of Governors, we have conducted an audit of the processes used by the University to ensure the completeness, accuracy, and timeliness of data submissions to the BOG. As part of this system-wide audit, we chose to focus on data elements supporting Metric #4 – *Four-Year Graduation Rate,* and Metric #7 – *University Access Rate*.

The primary objectives of this audit were to:

- Evaluate controls and processes established by the Office of Institutional Effectiveness and Analysis and primary data custodians to ensure completeness, accuracy and timeliness of data submitted to the BOG; and,

- Provide a reasonable basis of support for the Performance Based Funding Data Integrity Certification statement which is required to be signed by the University president and Board of Trustees chair.

Our audit covered data submissions to the BOG through October 31, 2018. Detailed testing of data submitted to the BOG was limited to information found in the *Degrees Awarded (SIFD)* and *Student Financial Aid (SFA)* files, used for calculation of Metrics #4 and #7 respectively. Elements located in data tables of these two files were tested on a sample basis for validation with information primarily recorded in the Banner Student System and other records such as scanned documents maintained in the University's virtual imaging system - VIP. Other relevant information reviewed for the audit included BOG narratives on PBF metric derivations, BOG data definitions, minutes of the University's data integrity committee, and documentation related to controls over centralized and decentralized data validation, compilation and submission protocols.

Our audit was conducted in accordance with the Institute of Internal Auditors' International Standards for the Professional Practice of Internal Auditing.

BACKGROUND

The Florida Board of Governors has broad governance responsibilities affecting administrative and budgetary matters for Florida's 12 public universities. In January 2014, the BOG approved a performance funding model for the State University System of Florida (SUS) based on ten metrics, the first eight of which are common to all institutions and the last two reflecting the choices of the BOG and each university's board of trustees respectively. Listed below are the 10 performance based funding metrics which are applicable to Florida Atlantic University for the 2018/19 scoring cycle:

1. **Percent of Bachelor's Graduates Employed (Earning $25,000 +) or Continuing their Education**
2. **Median Wages of Bachelor's Graduates Employed Full-time**
3. **Average Cost to the Student** (Net Tuition per 120 Credit Hours)
4. **Four Year Graduation Rate** (Full-time FTIC)
5. **Academic Progress Rate (Second Year Retention Rate with GPA Above 2.0)**
6. **Bachelor's Degrees Awarded in Areas of Strategic Emphasis**
7. **University Access Rate** (Percent of Undergraduates with a Pell grant)
8. **Graduate Degrees Awarded in Areas of Strategic Emphasis**
9. **Percent of Baccalaureate Degrees Awarded Without Excess Hours**
10. **Percent of Baccalaureate Degrees Awarded to Minorities**

The BOG performance funding model has four guiding principles: 1) use metrics that align with SUS Strategic Plan goals, 2) reward Excellence or Improvement, 3) have a few clear, simple metrics, and 4) acknowledge the unique mission of the different SUS institutions.

Controls over Data Validation, Compilation, and Submission

The Florida Board of Governors maintains a student unit record database titled the State University Database System (SUDS). This database contains over 400 data elements about students, faculty and programs at SUS institutions. SUDS is part of a web-based portal developed by the BOG for the SUS to report data, and has centralized security protocols for access, data encryption, and password controls. Initial input of data files supporting PBF metrics is the responsibility of primary data custodians, such as the Admissions Office, Office of the Registrar, and Student Financial Aid, and is scheduled to be uploaded to SUDS based on the BOG's *Due Date Master Calendar*. Data uploaded to SUDS by various departments are subject to edit checks to help ensure propriety, consistency with BOG-defined data elements, and accuracy of information submitted. Once satisfied that any edit errors have been fully addressed, official submission of data files to the BOG is managed by the Office of Institutional Effectiveness and Analysis (IEA), a unit within the Office of Information Technology.

Each file submission by IEA is subject to an affirmation statement in SUDS which declares that data submitted for approval "represents electronic certification of this data per Board of Governors Regulation 3.007". The University also requires an internal certification by departments when they upload data to SUDS. The internal certification is an email notification to IEA from the departmental data custodian manager which states "I certify that the approved business process for submission of the data file(s) has been followed and that the data submission is free from any major errors and accurate to the best of my knowledge."

Board of Governors acceptance of data submissions is a formal process which is documented in SUDS, and if a submission is rejected it will be subject to resubmission protocols set by the BOG.

Degrees Awarded and Student Financial Aid data submissions

As part of the audit, we chose to focus on Metrics 4 and 7 based on significant changes in the computations and implications for the 2018/19 performance based metrics scoring cycle. Since implementation of the performance metrics model for the State University System in 2014, Metric #4 had been established to evaluate the 6-Year graduation rate for first-time-in-college (FTIC) students from the same university. Evaluation for this metric was recently changed to a 4-Year rate benchmark, with the most current information based on FTIC students graduating in the 2018 summer semester. Universities that meet or exceed the 50% mark under the new standard will be granted maximum points, while those with a 4-Year graduation rate below 38.8% will receive no points. Similarly, Metric #7, which measures the level of undergraduates receiving Pell grants, had an unchanged benchmark scoring rate since 2014. Recent changes to this metric make it more restrictive by allowing universities to only score maximum points if the percent of undergraduates receiving Pell grants comprise 42% or more of enrollment. The most current information filed with the BOG for this metric reflect undergraduate students enrolled during the 2017 fall semester.

COMMENTS AND RECOMMENDATIONS

Current Findings and Recommendations

No findings were noted as a result of this audit.

Prior Audit Recommendations

Our examination generally includes a follow-up on findings and recommendations of prior internal audits, where the subjects of such findings are applicable to the scope of the current audit being performed.

Within the past three years, our office has conducted data integrity audits related to the BOG performance based funding model. There were no reportable findings in the prior year's audit and any audit recommendations reported in similar audits completed during the last three fiscal years were satisfactorily addressed with appropriate corrective action.

CONCLUSION

Based on our audit, we have concluded that the controls and processes which Florida Atlantic University has in place to ensure the accuracy and completeness of data submitted to the Board of Governors in support of performance based funding are adequate.

We believe our audit can be relied upon by the University Board of Trustees and president as a basis for certifying representations to the Board of Governors related to the integrity of data required for its performance based funding model.

We wish to thank the staffs of the Office of Institutional Effectiveness and Analysis, Office of the Registrar, and other primary data custodians for their cooperation and assistance which contributed to the successful completion of this audit.

Morley Barnett, CPA, CPE
Inspector General

Audit performed by: Morley Barnett, CPA, CFE
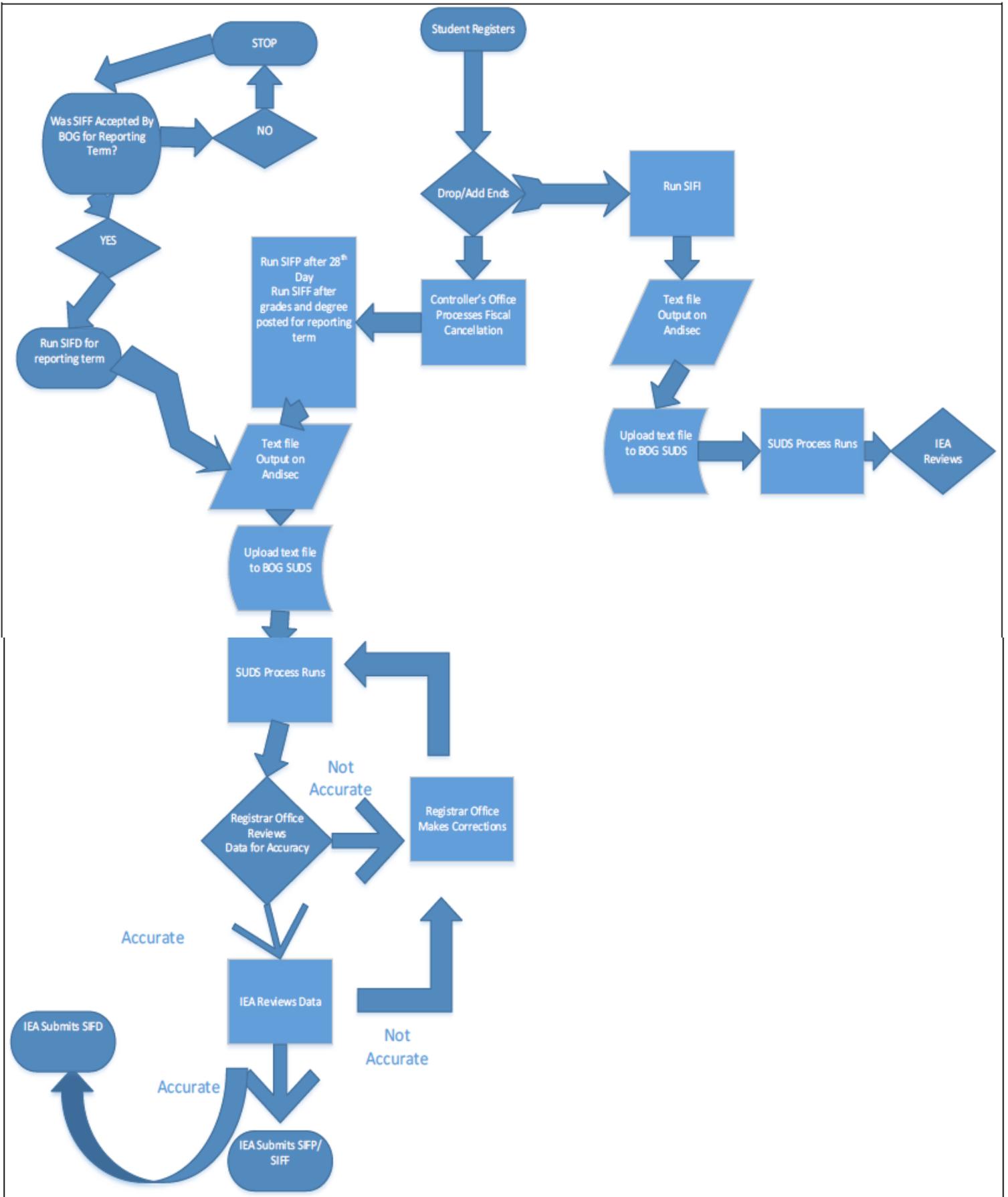   Allaire Vroman

Performance Based Funding Data Integrity Audit
10/31/2018

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- Metric #4, *Retention and Graduation Rates*	
- Metric #7, *University Access Rate*	
• DATA INTEGRITY CERTIFICATION STATEMENT REQUIRED BY BOG	C

- STOP
- Student Registers
- Was SIFF Accepted By BOG for Reporting Term?
- NO
- YES
- Drop/Add Ends
- Run SIFI
- Run SIFP after 28th Day / Run SIFF after grades and degree posted for reporting term
- Controller's Office Processes Fiscal Cancellation
- Text file Output on Andisec
- Run SIFD for reporting term
- Text file Output on Andisec
- Upload text file to BOG SUDS
- SUDS Process Runs
- IEA Reviews
- Upload text file to BOG SUDS
- SUDS Process Runs
- Registrar Office Reviews Data for Accuracy
- Not Accurate
- Registrar Office Makes Corrections
- Accurate
- IEA Reviews Data
- Not Accurate
- IEA Submits SIFD
- Accurate
- IEA Submits SIFP/SIFF

Performance Funding Metrics
Retention and Graduation Rates

OVERVIEW
OF METHODOLOGY
AND PROCEDURES

REVISED 07/13/2018

STATE UNIVERSITY SYSTEM *of* FLORIDA
Board of Governors

Background

The national standard graduation rate was created by the Student Right to Know Act of 1990, which required institutions of higher education receiving federal financial assistance to report graduation rates to current and prospective students via the US Department of Education's Integrated Postsecondary Education Data System (IPEDS). This act established the graduation rate based on 150% of the normal time for completion from the program - which is six years for a four-year program.

In 2011, the Board of Governors included retention and graduation rate metrics in its 2012-2025 System Strategic Plan. In 2014, the importance of the retention and graduation rate data was further elevated by their inclusion in a new Performance-Based Funding (PBF) Model. In 2018, the Florida Legislature changed the graduation rate metric included in PBF from a six-year to a four-year measure. This document provides details on the methodology and procedures used by Board of Governors staff during the analysis of the retention and graduation rate data as reported in the annual Accountability Report and used in the Performance Based Funding model.

1. Overview of Data Sources & Procedure

The State University System of Florida Board of Governors maintains a student unit record database titled the State University Database System (SUDS). This database contains over 400 data elements about students, faculty and programs at SUS institutions. Retention and graduation rate data are finalized using the Retention submission. The Board's Office of Data & Analytics (ODA) unit builds the Retention file annually using data from the Admission (ADM), Student Instruction File (SIF) and the Degrees Awarded (SIFD) submissions that have been previously submitted by university Data Administrators. Once Retention has been built, each university Data Administrator reviews the Retention data and works with ODA staff to make edits before university Data Administrators approve and submit the final data to ODA. After universities have approved the Retention submission, the Board's ODA staff calculate the number of students in a cohort (which serves as the denominator) and the number of those same students who are retained or graduated by a specified year (which serves as the numerator). ODA staff then provide the results of the retention and graduation rate data analysis to each university Data Administrator for their review and approval prior to the data being shared with, and approved by, each university Board of Trustee and the Board of Governors as part of the Accountability Plan process.

2. Defining the Cohort

A cohort is a group of people used in a study who have something in common. In this case, a cohort is composed of students who were all admitted to the university during the same year. The number of students who are assigned to a cohort serves as the denominator in the calculation of retention and graduation rates. University Data Administrators classify students based on the following components which Board staff use to determine student cohorts:

a. **Student Level:**
   Only the students who meet the following criteria are included in the cohort.
   - STUDENT CLASS LEVEL [#1060] is either L (lower division undergraduate) or U (upper division undergraduate).
   - DEGREE HIGHEST HELD [#1112] must be less than a Bachelor's.
   - FEE CLASSIFICATION KIND [#1107] must equal 'G' (general instruction).

b. **Cohort Year:**
   A year is measured differently in retention and graduation data than the standard academic year (of summer, fall, spring). A retention cohort year is defined as the fall, spring, and summer terms. Students selected for inclusion within each Cohort Year are based on the following rule:
   - DATE MOST RECENT ADMISSION [#1420] equals REPORTING TIME FRAME [#2001].

c. **Cohort Types:**

The COHORT TYPE [#1429] is a derived element that is built by ODA and is based on the TYPE OF STUDENT AT TIME OF MOST RECENT ADMISSION [#1413] as assigned by the university.

- First-Time in College Students include two types of students:
  - Students who are admitted into a university for the first time and who have earned less than 12 credit hours after high school graduation [#1413= 'B'].
  - Students who are considered 'Early Admits' because they have been officially admitted and are seeking a degree at the university prior to their high school graduation [#1413= 'E'].

- AA Transfer Students who have transferred from the Florida College System with an Associate in Arts Degree. This value is based on the three following elements:
  - TYPE OF STUDENT AT DATE OF ENTRY [#1068] or TYPE OF STUDENT AT TIME OF MOST RECENT ADMISSION [#1413] equals 'J'.
  - DEGREE HIGHEST HELD [#1112] equals 'A' (Associates).
  - LAST INSTITUTIONAL CODE [#1067] or INSTITUTION GRANTING HIGHEST DEGREE [#1411] must equal a Florida Public Community College.

- Other Transfer Students include all other undergraduate transfer students.

d. **Student Right to Know Flag:**

The STUDENT RIGHT TO KNOW (SRK) FLAG [#1437] is an entry status indicator that is a 'Yes/No' flag based on the term (Summer, Fall, or Spring) that a student is first admitted.

- YES: If a student enters the institution in the fall term the SRK flag will be set to 'Yes'. If a student enters the institution in the summer term and progresses to fall term, the SRK flag will be set to 'Yes'.

- NO: If a student enters in the summer term and does not progress to the fall term; or, if a student enters in the spring term the SRK flag will be set to 'No'.

e. **Full-Time / Part-Time Indicator:**

The FULL-TIME / PART-TIME INDICATOR [#1433] is an indicator based on the number of credit hours attempted (not earned) during their first fall term. A student entering in the fall and taking 12 or more credit hours will remain in the full-time category regardless of the number of credits taken in subsequent terms.

- This indicator is based on the CURRENT TERM COURSE LOAD [#1063] which is the number of hours enrolled/attempted during a term. This excludes courses that are audited, all credits awarded during the term through 'Credit by Examination'. Students completing prior term incompletes are not included unless they have registered and paid fees for the credits they are completing.

- This indicator is used in reporting retention and graduation data to the federal government - to IPEDS.

f. **Cohort Revisions and Adjustments:**

The US Congress and the US Dept. of Education allow institutions to make revisions and adjustments to their student cohorts. There is a difference between revising and adjusting a cohort. Revising a cohort means modifying the cohort data to reflect better information that has become available since the cohort was first reported. Adjusting a cohort means subtracting any allowable exclusions from the revised cohort to establish a denominator for graduation rate calculation. These cohort adjustments are typically the cause of the differences between historical and updated retention and graduation rates.

- Cohort Adjustment Flag [#1442] is a data element on the Retention Cohort Changes (RETC) table that is used to indicate that a retention file record has been modified based on a change in status of the student at the institution.
  - o University Data Administrators identify the students who have died, suffered a permanent disability, left to serve in the Armed Services, left to serve in with Foreign Aid Service of the federal government (such as the Peace Corps), or left to serve on an Official Church Mission. These students are removed from the cohort and are not included in the retention and graduation rates.
  - o University Data Administrators also can identify students who enter an Advanced Graduate program (e.g., PharmD) without earning a bachelor's degree. Since these students do not earn a bachelor's degree, they can be removed from the standard FTIC cohort. This is technically an adjustment, not an exclusion because students are moved from one cohort to another.

3. Calculating the Number Retained or Graduated

a. Second Year Retention Rates

- Cohorts: The number of students in the cohort serves as the denominator for the retention rate, and is based on the following rules: Cohort Type= 'FTIC'; Student Right to Know (SRK)= 'Yes'; FT/PT Indicator= 'Full-time'.
  - o The methodology used for the Retention Rate in the annual Accountability Report is different from what is reported to the U.S. Department of Education's Integrated Postsecondary Education Data System (IPEDS). The primary difference is due to timing – the retention rate that is reported to IPEDS is based on preliminary enrollment data; whereas the retention rate in the annual Accountability Report is based on final enrollment data.

- Retained: The number of students in the cohort who are enrolled during the second fall term serves as the numerator for the retention rate.

- As part of the Performance Based Funding model, the Board of Governors decided to add a Grade Point Average (GPA) component to the standard retention rate metric to gain a sense of how well students who are retained are doing in their courses. This new metric is called the Academic Progress Rate. Board staff decided to use a cumulative GPA (at the end of the first year - before the second fall term) of at least 2.0 as a threshold because it is a commonly referenced measure of satisfactory academic progress. In fact, FTICs who returned for their 2nd fall with a GPA above 2.0 are *8 times more likely* to graduate within six years than students who begin their second Fall with a GPA of less than 2.0.

b. Four Year FTIC Graduation Rates

- Cohorts: The number of students in the cohort serves as the denominator for the graduation rate. The denominator used in the calculation of the four-year FTIC graduation rate is based on the following: Cohort Type= 'FTIC' ('B' and 'E'); SRK= 'Yes'; FT/PT Indicator= 'Full-time' only; when Cohort Adjust Indicator is not equal to 'A','B', 'F', 'K','P', 'T' and when Degree Level Sought (#01053) in the fourth year is not equal to a Pharmacy Degree ('W').
- Graduated: The number of students in the cohort who graduated within four years (by the fourth summer term after entry) from the same university serves as the numerator for the graduation rate. It is important to note that a small number of degrees are reported to SUDS after the degree was awarded – these are called 'late degrees'. The methodology for four-year graduation rates include these 'late degrees'; however, late degrees that haven't already been submitted on the SIFD must be submitted on the Retention submission to be included in the graduation rates.

Performance Funding Metrics
University Access Rate
(Percent of Undergraduates with a Pell Grant)

OVERVIEW
OF METHODOLOGY
AND PROCEDURES

REVISED 06/08/2016

STATE UNIVERSITY SYSTEM *of* FLORIDA
Board of Governors

The State University System of Florida included the University Access Rate in the Performance-Based Funding model to help preserve access for students from low-income families. This document provides details on the methodology and procedures used by Board of Governors staff to calculate the percentage of undergraduates with a Pell-Grant as reported in the annual Accountability Report and used in the Performance Based Funding model.

BOG Analysis of State University Database System (SUDS) Data

The State University System of Florida Board of Governors maintains a student unit record database titled the State University Database System (SUDS). This database contains over 400 data elements about students, faculty and programs at SUS institutions. The University Access Rate is based on data from the enrollment table on the Student Instruction File (SIF), and the Awards table on the Student Financial Aid (SFA) file.

a. **Numerator**: Board staff query the Financial Aid Awards table within SUDS to identify the students who received a Pell Grant (award_prog_id='001') during the Fall term (award_payment_term= 'yyyy08').

 ▪ In addition to demonstrating financial need, the US Dept. of Education considers other factors when determining eligibility for a federal Pell grant. For example, students must be a US citizen or an eligible noncitizen[1]. The US Dept. of Education does provide a few exceptions whereby non-resident aliens can receive a Pell grant. SUDS does not collect information to allow Board staff to determine the Pell-eligibility for non-resident aliens; therefore, Board staff exclude non-resident aliens (#2043 = 'Y') from both the numerator and denominator for this metric.

b. **Denominator**: Board IR staff identify all degree-seeking undergraduate (both lower and upper divisions) students enrolled in the Fall term. In addition, Board staff exclude unclassified students (student_class_level='N') and post-baccalaureate students (stu_recent_adm_typ= 'P') from the denominator because these students are not eligible for a Pell grant.

Note on US Dept. of Education Pell Data

The US Dept. of Education reports data for the 'Percent of Undergraduate Students Receiving Pell Grants' online at the Integrated Postsecondary Education Data System (IPEDS) website. However, Board staff decided not to use the IPEDS data for this metric for the following reasons:

 ▪ Since there is funding attached to the data, Board staff felt it was preferable to calculate the percentage of undergraduates receiving Pell grants using the student level data that is available in SUDS rather than simply using the data that universities report to IPEDS.

 ▪ Board staff also felt that the methodology that is used by IPEDS to generate their percentage of under-graduates who received a Pell grant is flawed. In IPEDS, the numerator is based on the number of students who received a Pell grant anytime during a particular academic year. Alternatively, the denominator is only based on the students enrolled during the Fall term – including unclassified students who are not seeking a degree and therefore not eligible for financial aid. Furthermore, the IPEDS Financial Aid survey imports the total headcount denominator from their Fall Enrollment survey. Due to the IPEDS schedule for data submissions, the State University System of Florida institutions use the *preliminary* Student Instruction File (SIFP) data when reporting the total Fall enrollment counts on the Fall Enrollment survey, so the denominator that IPEDS uses to calculate the percentage of undergraduates who received a Pell grant is based on preliminary data.

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[1] For more information about eligibility requirements for the federal Pell grant, see: https://studentaid.ed.gov/sa/eligibility/basic-criteria.

STATE
UNIVERSITY
SYSTEM
of FLORIDA
Board of Governors

Performance Based Funding
March 2019 Data Integrity Certification

University Name: _____

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

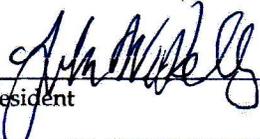| Performance Based Funding Data Integrity Certification Representations			
Representations	**Yes**	**No**	**Comment / Reference**
1. I am responsible for establishing and maintaining, and have established and maintained, effective internal controls and monitoring over my university's collection and reporting of data submitted to the Board of Governors Office which will be used by the Board of Governors in Performance Based Funding decision-making.	☑	☐	
2. These internal controls and monitoring activities include, but are not limited to, reliable processes, controls, and procedures designed to ensure that data required in reports filed with my Board of Trustees and the Board of Governors are recorded, processed, summarized, and reported in a manner which ensures its accuracy and completeness.	☑	☐	
3. In accordance with Board of Governors Regulation 1.001(3)(f), my Board of Trustees has required that I maintain an effective information system to provide accurate, timely, and cost-effective information about the university, and shall require that all data and reporting requirements of the Board of Governors are met.	☑	☐	
4. In accordance with Board of Governors Regulation 3.007, my university shall provide accurate data to the Board of Governors Office.	☑	☐	
5. In accordance with Board of Governors Regulation 3.007, I have appointed a Data Administrator to certify and manage the submission of data to the Board of Governors Office.	☑	☐	

Performance Based Funding
Data Integrity Certification

Performance Based Funding Data Integrity Certification Representations			
Representations	**Yes**	**No**	**Comment / Reference**
6. In accordance with Board of Governors Regulation 3.007, I have tasked my Data Administrator to ensure the data file (prior to submission) is consistent with the criteria established by the Board of Governors Data Committee. The due diligence includes performing tests on the file using applications/processes provided by the Board Office.	☑	☐	
7. When critical errors have been identified, through the processes identified in item #6, a written explanation of the critical errors was included with the file submission.	☑	☐	
8. In accordance with Board of Governors Regulation 3.007, my Data Administrator has submitted data files to the Board of Governors Office in accordance with the specified schedule.	☑	☐	
9. In accordance with Board of Governors Regulation 3.007, my Data Administrator electronically certifies data submissions in the State University Data System by acknowledging the following statement, "Ready to submit: Pressing **Submit for Approval** represents electronic certification of this data per Board of Governors Regulation 3.007."	☑	☐	
10. I am responsible for taking timely and appropriate preventive / corrective actions for deficiencies noted through reviews, audits, and investigations.	☑	☐	
11. I recognize that the Board's Performance Based Funding initiative will drive university policy on a wide range of university operations – from admissions through graduation. I certify that university policy changes and decisions impacting this initiative have been made to bring the university's operations and practices in line with State University System Strategic Plan goals and have not been made for the purposes of artificially inflating performance metrics.	☑	☐	
12. I certify that I agreed to the scope of work for the Performance Based Funding Data Integrity Audit conducted by my chief audit executive.	☑	☐	

Performance Based Funding Data Integrity Certification Form   *Page 2*

Performance Based Funding
Data Integrity Certification

I certify that all information provided as part of the Board of Governors Performance Based Funding Data Integrity Certification is true and correct to the best of my knowledge; and I understand that any unsubstantiated, false, misleading, or withheld information relating to these statements render this certification void. My signature below acknowledges that I have read and understand these statements. I certify that this information will be reported to the board of trustees and the Board of Governors.

Certification: _____ Date _1/15/19_
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 _1/15/19_
Board of Trustees Chair