



Item: AF: I-1

**AUDIT AND FINANCE COMMITTEE**  
**Tuesday, January 24, 2017**

**SUBJECT: REVIEW AUDIT REPORT FAU 16/17-1, PERFORMANCE BASED FUNDING  
DATA INTEGRITY AS OF OCTOBER 31, 2016.**

---

**PROPOSED COMMITTEE ACTION**

Acceptance of the audit as a basis of support for certification representations requested of the president and BOT chair by the Florida Board of Governors and fulfillment of the BOG's request for an audit of the completeness, accuracy and timeliness of data submissions.

**BACKGROUND INFORMATION**

The integrity of data provided to the Board of Governors is critical to the performance based funding decision-making process. The BOG has requested that an audit be conducted to evaluate the controls and processes established by state universities as part of its Strategic Plan and governance responsibilities. In addition, the BOG has requested that a data integrity certification form be signed by the president and BOT chair and submitted by March 1, 2017.

Our audit indicated that untimely data submissions to the BOG remains an issue for which management continues to seek the best course of action in mitigating.

**IMPLEMENTATION PLAN/DATE**

January 30, 2017.

**FISCAL IMPLICATIONS**

University data integrity is foundational to fiscal accountability and critical to future BOG performance based funding of Florida's public universities.

---

**Supporting Documentation:** OIG Report FAU 16/17-1, Performance Based Funding Data  
Integrity as of October 31, 2016.

**Presented by:** Mr. Morley Barnett, Inspector General

**Phone:** 561-297-3682

Report No. FAU 16/17-1  
Report Issue Date: January 12, 2017

FLORIDA ATLANTIC  
UNIVERSITY™

*Office of Inspector General*

Audit Report: *Performance Based Funding Data Integrity*

As of October 31, 2016

Use of Report

We are employed by Florida Atlantic University. This report is intended solely for the internal use of the State University System and is not intended to be used for any other purpose. This restriction is not intended to limit the distribution of this report, which is a matter of public record.

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

**REPORT ON THE AUDIT OF  
PERFORMANCE BASED FUNDING DATA INTEGRITY**

TABLE OF CONTENTS

<u>ITEM</u>	<u>PAGE</u>
LETTER OF TRANSMITTAL . . . . .	iii
EXECUTIVE SUMMARY . . . . .	iv
SCOPE AND OBJECTIVES . . . . .	1
BACKGROUND . . . . .	1
COMMENTS AND RECOMMENDATIONS . . . . .	3
CONCLUSION . . . . .	5
LIST OF REPORT APPENDICES (A, B and C) . . . . .	6

**Florida Board of Governors  
Performance Funding Allocation, 2016-2017  
June 23, 2016**

	Points	Allocation of State Investment	Allocation of Institutional Investment <sup>1</sup>	Total Performance Funding Allocation
FAMU	65	\$11,509,132	\$14,066,717	\$25,575,849
FAU	84	\$25,346,748	\$21,642,163	\$46,988,911
FGCU	67	\$8,010,396	\$9,790,484	\$17,800,880
FIU	76	\$25,253,750	\$30,865,695	\$56,119,445
FSU	68	\$35,574,608	\$43,480,076	\$79,054,684
NCF	59	\$0	\$2,740,857	\$2,740,857
UCF	84	\$39,301,181	\$38,697,580	\$77,998,761
UF	82	\$47,695,822	\$49,180,011	\$96,875,833
UNF	56	\$0	\$12,914,790	\$12,914,790
USF	79	\$32,308,363	\$39,488,000	\$71,796,363
UWF	57	\$0	\$12,133,627	\$12,133,627
<b>Total</b>		<b>\$225,000,000</b>	<b>\$275,000,000</b>	<b>\$500,000,000</b>



MEMORANDUM

TO: Dr. John Kelly  
President

FROM: Morley Barnett   
Inspector General

DATE: January 12, 2017

SUBJ: PERFORMANCE BASED FUNDING DATA INTEGRITY AUDIT

In accordance with the University's Internal Audit Plan for fiscal year 2016-17, 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, 2016. The report contained herein presents our scope and objectives and provides comments and conclusions resulting from procedures performed.

We have made one recommendation to address our finding. We concur with the response of the auditee which has been incorporated into the report. In accordance with our established procedures, follow-up will be performed subsequent to the issuance of this report to determine effective implementation of the recommendation by management.

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

Office of Inspector General • 777 Glades Road • Boca Raton, FL 33431

Tel: 561.297.3682 • Fax: 561.297.2479 • [www.fau.edu/admin/oig](http://www.fau.edu/admin/oig)

*An Equal Opportunity/Equal Access Institution*

---

## Executive Summary

---

In accordance with the University's Internal Audit Plan for fiscal year 2016-17, 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, 2016.

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 compliance testing of data elements comprising the *Degrees Awarded* file which is used in computations for seven of the ten performance based funding metrics.

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. Similar to the previous year's audit, we noted delays in submission of some data files required to compute several of the metrics. The details of this finding and suggestion for corrective action, along with other results of tests performed, can be found in the Comments and Recommendations section of this report.



January 12, 2017

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 the *Degrees Awarded* file, used in computations for seven of the ten performance based funding metrics.

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, 2016. Detailed testing of data submitted to the BOG was limited to information found in the SIFD - Degrees Awarded file. Other relevant information reviewed for the audit included BOG narratives on PBF metric derivations, data definitions, minutes of the University's data integrity committee, and documentation related to centralized and decentralized data validation, compilation and submission protocols.

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

### 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

Office of Inspector General • 777 Glades Road • Boca Raton, FL 33431

Tel: 561.297.3682 • Fax: 561.297.2479 • [www.fau.edu/admin/oig](http://www.fau.edu/admin/oig)

*An Equal Opportunity/Equal Access Institution*

choices of the BOG and FAU's Board of Trustees respectively. Listed below are the 10 performance based funding metrics which are applicable to Florida Atlantic University:

1. **Percent of Bachelor's Graduates Employed Full-time in Florida or Continuing their Education in the U.S. One Year After Graduation**
2. **Median Wages of Bachelor's Graduates Employed Full-time in Florida One Year After Graduation**
3. **Net Tuition per Degree for Resident Undergraduates [120-hour Program] eff 12/1/2016 \***
4. **Six-Year Graduation Rate for First-time-in-College (FTIC)**
5. **Students Academic Progress Rate [Second Year Retention Rate with GPA Above 2.0]**
6. **Bachelor's Degrees Awarded within Programs of Strategic Emphasis [including STEM]**
7. **University Access Rate [Percent of undergraduates with a Pell grant]**
8. **Graduate Degrees Awarded within Programs of Strategic Emphasis [including STEM]**
9. **Baccalaureate Degrees Awarded Without Excess Hours**
10. **Percent of Baccalaureate Degrees Awarded to Minorities**

\*Formerly, Metric 3 was the Average Cost per Undergraduate Degree to the Institution

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 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 edits errors have been fully addressed, official submission of data files to the BOG is controlled 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.

SIFD - Degrees Awarded submissions

The Degrees Awarded file is a crucial source of information submitted for each semester of the academic year for metrics 1, 2, 4, 5, 6, 8a and 10b. Similar to the structure of other data files, SIFD consists of tables which are comprised of various data elements.

For the current audit, elements of the university’s SIFD submitted for the 2016 spring semester were tested for validation with source documents. (Details of the SIFD scope and structure are further explained in Appendix B of this report).

COMMENTS AND RECOMMENDATIONS

Current Findings and Recommendations

Based on our detailed testing of twenty-nine data elements included in tables of the SIFD - *Degrees Awarded* file, we noted consistency between the submitted data and corresponding source documents. However, for overall metric-linked submissions due to the BOG during the past 12 months ended 10/31/16, we noted several instances of late data submissions based on the BOG’s *Due Date Master Calendar* and IEA data as listed below.

<u>Data Submission</u>	<u>Reporting Period</u>	<u>Due Date</u>	<u>Per IEA - Date File Submitted</u>	<u>Number of Days Late</u>	<u>Primary Data Custodian</u>
<b>Student Instruction File</b>					Registrar
	Summer 2015	09/28/15	10/12/15	14	
	Summer 2016	10/03/16	10/11/16	8	
<b>Student Financial Aid</b>					Financial Aid
	Annual 2014/15	10/09/15	10/16/15	7	
	Annual 2015/16	10/14/16	10/25/16	11	
<b>Degrees Awarded</b>					Registrar
	Summer 2015	10/09/15	11/10/15	32	
	Spring 2016	06/30/16	07/20/16	20	
<b>Instruction &amp; Research</b>					IEA
	Annual 2014/15	10/06/15	10/20/15	14	
	Annual 2015/16	10/17/16	11/04/16	18	
<b>Hours-to-Degree</b>					Registrar
	Annual 2014/15	11/13/15	11/20/15	7	
<b>Student Instruction - Prelim</b>					Registrar
	Fall 2015	10/09/15	11/04/15	26	
	Fall 2016	10/21/16	10/27/16	6	
<b>Retention</b>					IEA
	Annual 2014/15	01/20/16	02/01/16	12	
<b>Expenditure Analysis</b>					Financial Affairs
	Annual 2015/16	10/21/16	11/04/16	14	



Similar to the observation in our prior audit (FAU15/16-1), IEA management has indicated that some instances of filing tardiness were due to the untimely identification and correction of data errors by university personnel, late processing of programming changes mandated by the BOG and the effect (interdependence) that one late submission may have on other filings. Additional reasons given for delays impacting the current year's submissions included the conversion to the Workday system effective 7/1/15, as well as Hurricane Matthew in October 2016.

---

## Management's Response

---

### Action Plan:

IEA is recommending changes to the submission form so that those who submit the files, will readily see the due date and explain any reasons for delays in submission. If they do a resubmission, the reason for having to ask for a resubmission is also included on the form. The hope is that this will bring to their attention the need to be timely and accurate. IEA will also run SQL (Structured Query Language) code to check for errors found in the past in addition to the BOG edits. IEA also runs frequency reports to check for any unusual differences in current versus prior reporting. IEA will continue to send out notifications of deadlines - we now ask the file owner in the email to specify the reason for any late submissions and re-submissions.

### Proposed Changes

1. move submission type on top of Time period
2. Resubmission
3. **Original Submission**
  - 1) If Original is selected then
  - 2) In Time period field, provide a drop down list for terms for the Submission selected by the user, ex. Admission:
    - ADM Summer 2016
    - ADM Fall 2016
    - ADM Spring 2017
  - 3) Based n the select from 2, populate the pre-inserted BOG due date
  - 4) Comparing Due Date with Today's date minus 1 (system date-1)  
add in the comments field "Please specify the reason for late submission..."

**FAU SUDS Data File Submission Form**

**Submission:**

- Admissions
- College Prep
- College Prep Completions
- Limited Access Programs
- Student Instruction Final
- Student Instruction Preliminary
- Degrees Awarded
- Hours To Degree
- Retention
- Student Financial Aid
- Teacher Education
- Instruction and Research
- Expenditure Analysis
- Operating Budget
- Salary Category Detail
- University Employee
- Physical Facilities Space File

**Submission type:**  Original  Resubmission

**Time period:** --SELECT--

ADM Spring 2017      Feb 24, 2017

**Comments:**

**Certification:** 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.

Name:

Email:

### Implementation Date:

The request for changes to the submission form will be made by January 30, 2017

(IEA has sent out a notification of submission deadlines with a request that they specify any reasons for late submissions or resubmission during the spring 2017 semester. Each subsequent notification will include this language. We have already run SQL code and examined reports to check for prior errors with the SIF (Student Instruction File) and salary category detail submissions for the spring 2017 semester and will continue to do so going forward).

**Responsible Auditee:**

Dr. Jeff E. Hoyt, University Data Administrator

**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. As discussed in the Comments and Recommendations section of this report, we noted several instances of late submissions of data required by the BOG for performance based funding metrics, as similarly reported in last year's audit.

**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. As noted in the Comments and Recommendations section of this report, we continue to re-emphasize the timely submission of data files to the BOG as part of the University's overall data integrity and accountability goals.

We believe our audit can be relied upon by the University Board of Trustees and president as a basis for certifying the representations made to the Board of Governors related to the integrity of data required for its performance based funding model. Applicable comments have been made in the certification statement to reflect the current audit finding related to timeliness of data submissions to the BOG.

\*\*\*\*\*

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: Mike Hewett, CIA, CGAP, CBA, CFSA  
Morley Barnett, CPA, CFE



Performance Based Funding Data Integrity Audit  
10/31/2016

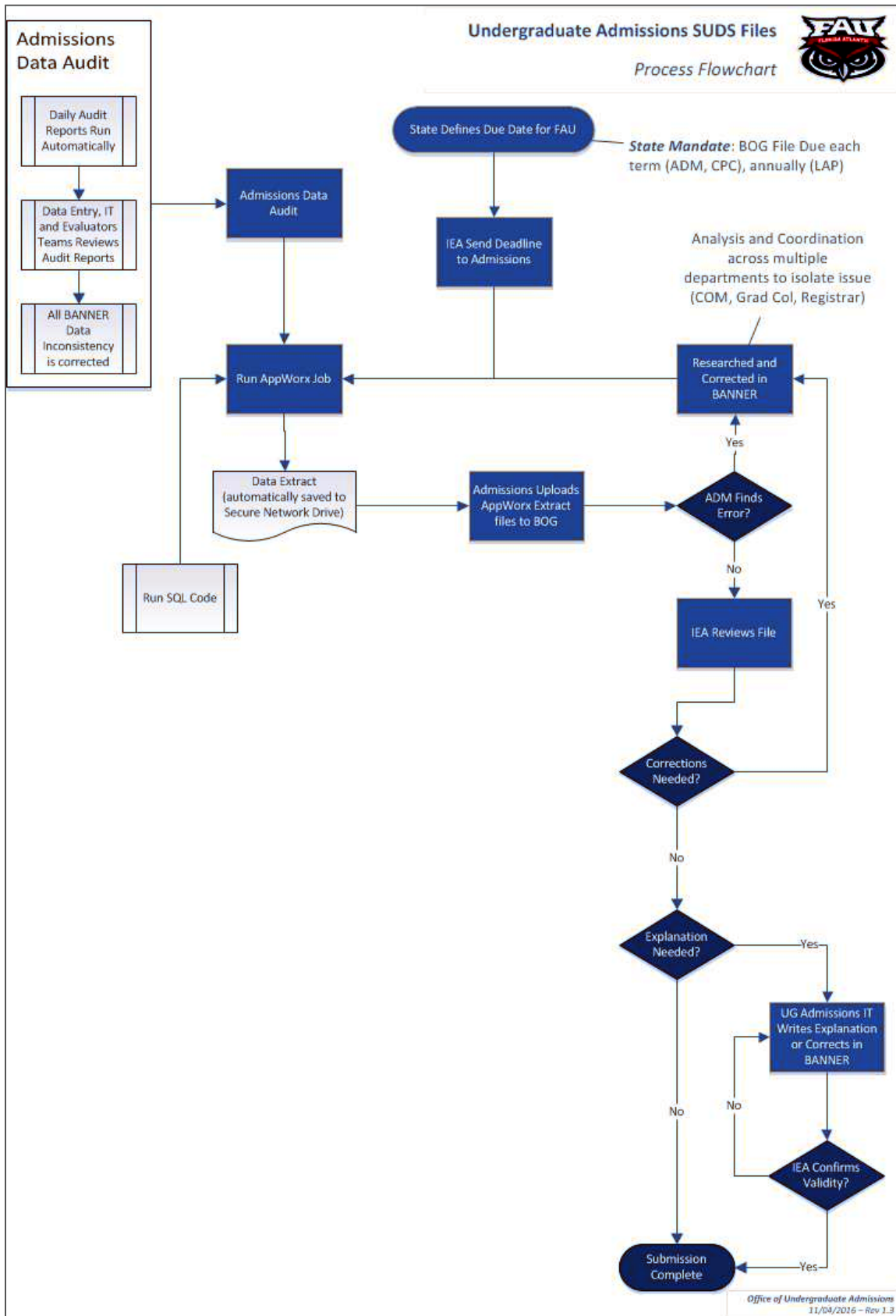
\*\*\*LIST OF REPORT APPENDICES\*\*\*

Appendix

- TYPICAL INTERNAL DATA PROCESS FLOW AND SUBMISSION TO BOG A
- SUMMARY OF *DEGREES AWARDED (SIFD)* FILE B
- DATA INTEGRITY CERTIFICATION STATEMENT REQUIRED BY BOG C  
(with applicable comments for representation # 8)

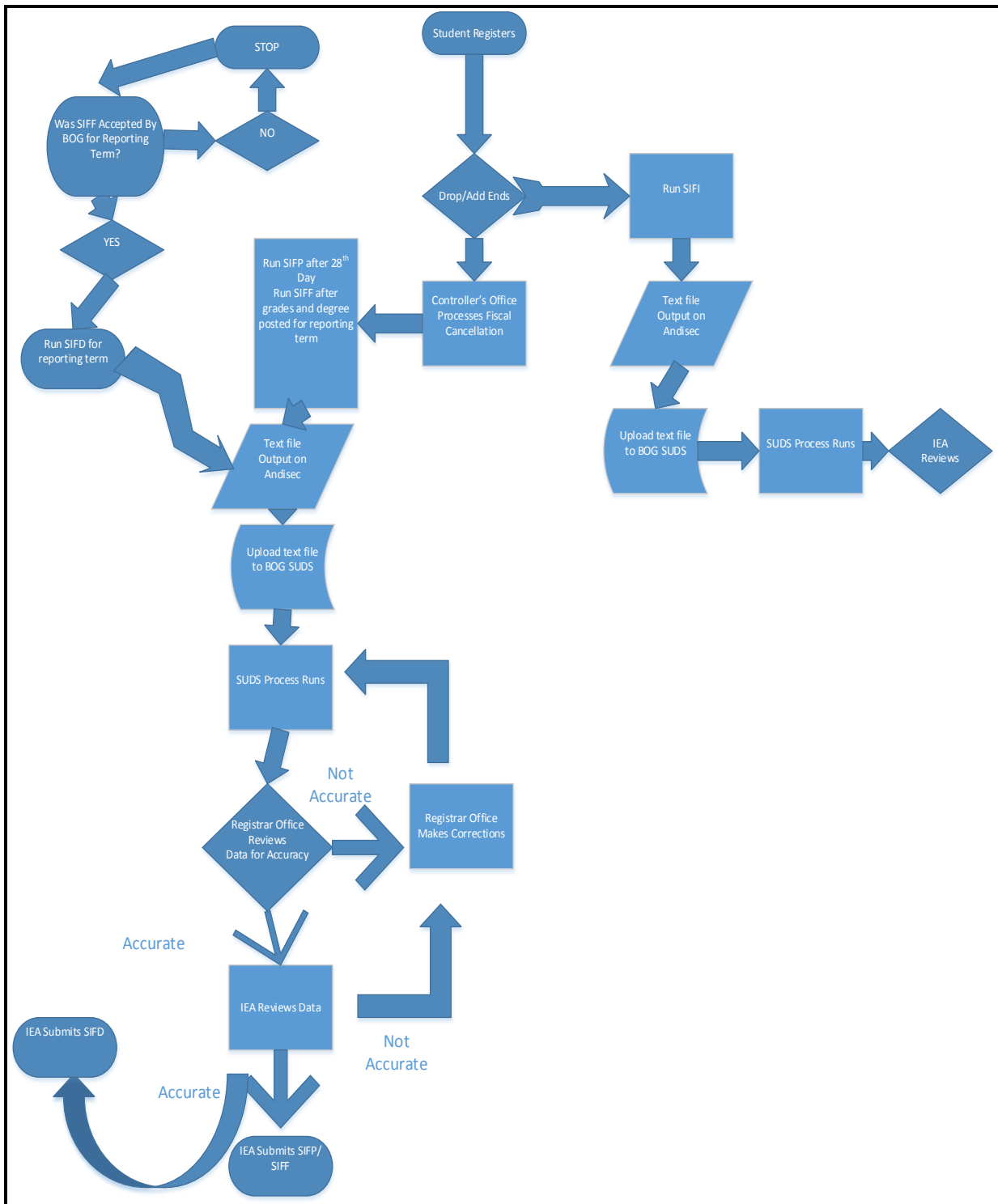
**Typical Process Flow for Data Integrity and Submission to the Florida Board of Governors**

*Office of Undergraduate Admissions*



**Typical Process Flow for Data Integrity and Submission to the Florida Board of Governors**

***Office of the Registrar***



Performance Based Funding Data Integrity Audit  
Fiscal Year 2016/17

**Degrees Awarded (SIFD) Data submission**

Column Name	Element Name	Element #	Basic explanation of elements (original data source)	Data Table	Related Metric
1 UNIV_ROW_ID	University Row Identifier	2002	Code used by the university to identify a particular row in a file submission. Created using a four character report identifier (ie: 'D14S' for Degrees Awarded Spring 2014) concatenated with a four character alpha-numeric record counter	Degrees Awarded (Deg)	1, 2
2 REPT_TIME_FRAME	Reporting Time Frame	2001	Code indicating the time frame to which the data apply. Use current submission term date.	"	1, 2, 4, 5
3 REPT_INST	Reporting Institution	1045	The university within the SUS reporting this information -- code as 'FAU'	"	1, 2, 6, 8a, 10b
4 PERSON_ID	Person Identification Number	1029	A nine digit number assigned to an individual for identification purposes. Use the student's social security number if available. If unavailable, use the FAU ZNumber.	"	1, 2
5 FEE_CLASS_KIND	Fee Classification - Kind	1107	The classification of the type of registration fees (money charged by the university for instruction) and other payments made by the student to the university for educational purposes.	"	1, 2, 4, 5
6 TERM_DEG_GRANT	Term Degree Granted	1412	Code indicating the academic term in which a degree was granted to the student by the reporting institution. This date may or may not be equal to the value coded in Term Identifier (REPT_TIME_FRAME 02001).	"	1, 2, 6, 8a, 10b
7 DEG_LEVEL_GRANT	Degree - Level Granted	1081	The degree, certificate, or diploma awarded the student this term. Use the degree_level value from SHRDGMR	"	1, 2, 6, 8a, 10b
8 CIP_DEGREE	Degree Program Category	1082	The classification associated with the degree program in which the degree was awarded. Use the CIP code of the SHRDGMR major code	"	1, 2, 6, 8a, 10b
9 MAJOR_IND	Major Indicator	2015	Sequence number. Count of major on degree. Code 1 for 1st program, 2 for 2nd program, etc.	"	1, 2, 6, 8a
10 TCHR_PREP_DOE_CD	State-Approved Teacher Prep Pgm - DOE Code	1425	Florida Dept of Education (FDOE) classification of State Approved Teacher Preparation Program.	"	1, 2
11 DEMO_TIME_FRAME	Demo Time Frame	2041	Demographic Time Frame. Use current submission term date	"	1, 2
12 DEMO_DATA_SOURCE	Demo Data Source	2019	Source of demographic information for the current record. USE 'SIFD' for Degrees Awarded file	"	1, 2
13 AWARD_SOURCE	Award Source	2014	Source of the award contained in the current record. USE 'SIFD' for the Degrees Awarded file	"	1, 2
14 TCHR_PREP_DOE_LEVEL	State-Approved Teacher Prep Pgm - DOE Level	1423	This element identifies the levels of the Teacher Preparation Programs as approved by the Department of Education, Bureau of Educator Recruitment and Professional Development(ERPD). Set this value to '.' in all records	"	1, 2
15 TCHR_EDU_PGM_METHOD	Teacher Education Program Method	1436	A code indicating the method used to complete this State Approved Teacher Preparation Program	"	1, 2
16 CIP_FRAC_DEG	Degree Program Fraction of Degree Granted	1083	Portion of degree awarded in given program. This value is coded as 1 divided by the count of degree majors listed in SHRDGMR for the term	"	1, 2, 6, 8a, 10b
17 DOC_CLASS	Doctoral Classification	2039	IPEDS Reclassification of Doctorate and First-Professional Degrees. If the degree level in SHRDGMR is 'D', then if the CIP code in SHRDGMR is '513818' - code this data element with a value of 'P'. If other CIP codes - code this element with a value of 'R'. If the degree level in SHRDGMR is not 'D' - code this element with a value of '.'	"	1, 2
18 BE_CD	Budget Entity Code, SUS	1007	A code to indicate the budget entity in which the resource is administered or generated.	"	1, 2
19 U_RESV_1	University Filler Field 1	2003	University defined information. Created for Degrees Awarded file as follows: ZNumber    'P'    pidm    '^'    degree sequence number in SHRDGMR    '^'    degree code in SHRDGMR    '^'    college code in SHRDGMR    '^'    major code in SHRDGMR	"	1, 2
20 CAMPUS_CD_ADMIN	Administrative Campus Code	2050	Main campus or branch campus administratively responsible for the student. Set this value to '0001' in all records (for Boca Raton campus)	"	1, 2

Performance Based Funding Data Integrity Audit  
Fiscal Year 2016/17

**Degrees Awarded (SIFD) Data submission**

Column Name	Element Name	Element #	Basic explanation of elements (original data source)	Data Table	Related Metric
1 RACE_ETHNICITY	Racial/Ethnic Group	1044	Categories used to describe groups to which individuals belong, identify with, or belong in the eyes of the community. The categories do not denote scientific definitions of anthropological origins. A person may be counted in only one group. The manner of collection of the racial/ethnic information is left to the discretion of the institution provided that the system which is established results in reasonably accurate data, which may be replicated by others when the same documented system is utilized.	Person Demographics (DEMO)	10b
2 HISPANIC-FLG	Hispanic or Latino	1491	A person of Cuban, Mexican, Puerto Rican, South or Central American, or other Spanish culture or origin, regardless of race.	"	"
3 AM_IND_ALASKAN_FLG	American Indian/Alaska Native	1492	A person having origins in any of the original peoples of North and South America (including Central America), and who maintains tribal affiliation or community attachment.	"	"
4 ASIAN_FLG	Asian	1493	A person having origins in any of the original peoples of the Far East, Southeast Asia, or the Indian subcontinent including, for example, Cambodia, China, India, Japan, Korea, Malaysia, Pakistan, the Philippine Islands, Thailand, and Vietnam.	"	"
5 BLACK_AFRICAN_AM_FLG	Black or African American	1494	A person having origins in any of the black racial groups of Africa.	"	"
6 NAT-HAWAII_PAC_IS_FLG	Native Hawaiian or Other Pacific Islander	1495	A person having origins in any of the original peoples of Hawaii, Guam, Samoa, or other Pacific Islands.	"	"
7 WHITE_FLG	White	1496	A person having origins in any of the original peoples of Europe, the Middle East, or North Africa.	"	"
8 NON_RES_ALIEN_FLG	Non-resident Alien Flag	2043	An indication that neither race nor ethnicity is available and that the individual has not been reported as a non-resident alien. When NO_RACE_REPORTED_FLG equals 'Y' all other Race/Ethnicity flags must equal 'N'.	"	"
9 NO_RACE_REPORT_FLG	No Race Reported	1497	Non-resident Alien Flag. When NON_RES_ALIEN_FLG equals 'Y' all Race/Ethnicity flags must equal 'N'.	"	"



Name of University: \_\_\_\_\_

**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 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), 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"/>	



## 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 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 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"/>	Management is aware of several instances of late data submissions and is diligently working to ensure that these are minimized. Overall, the accuracy of data for late submissions was of paramount importance, and information was provided to the BOG in time for critical performance based funding determinations.
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 <b>Submit for Approval</b> 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 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	<input type="checkbox"/>	<input type="checkbox"/>	

# Performance Based Funding Data Integrity Certification

Performance Based Funding Data Integrity Certification Representations			
Representations	Yes	No	Comment / Reference
artificially inflating performance metrics.			
<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: _____ Date _____  <div style="margin-left: 40px;">President</div> </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: _____ Date _____  <div style="margin-left: 40px;">Board of Trustees Chair</div> </p>			