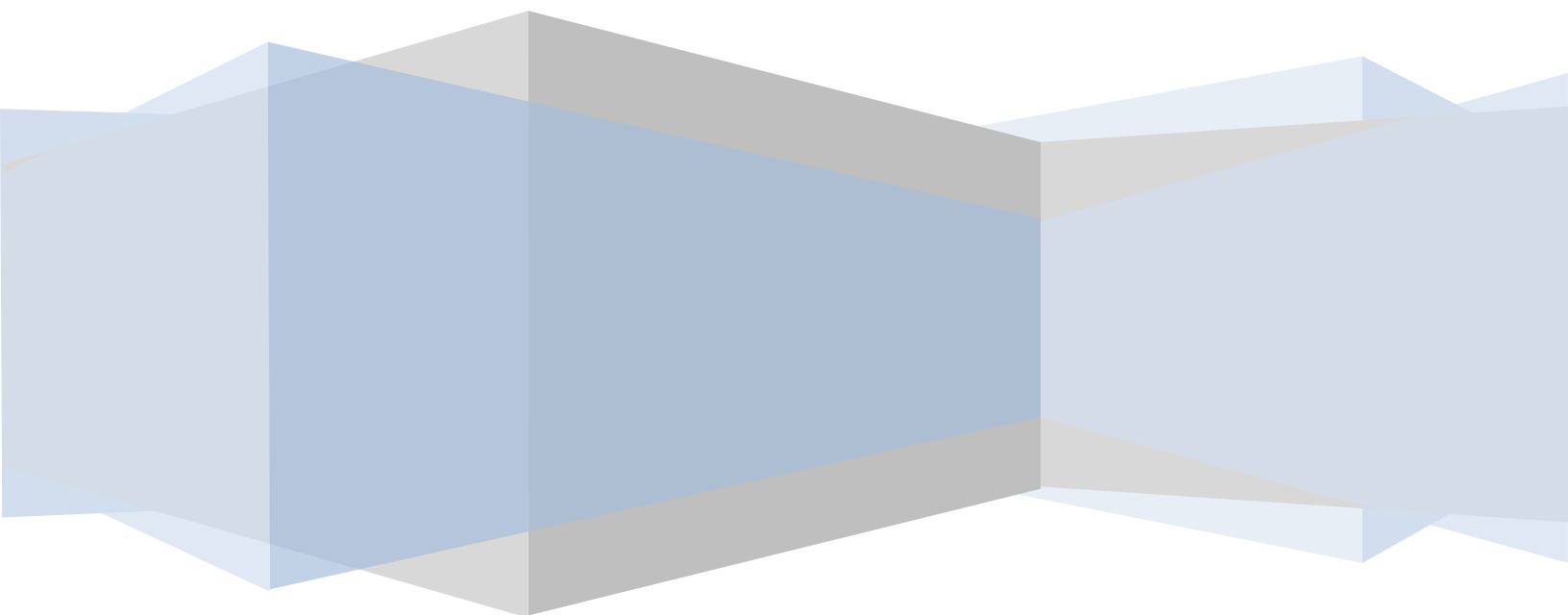# Florida Gulf Coast University

Performance Based Funding Data Integrity

Internal Audit Report

Report Date: January 29, 2025

PERFORMANCE BASED FUNDING DATA INTEGRITY AUDIT

EXECUTIVE SUMMARY

At the direction of the Florida Board of Governors (BOG), audit procedures were performed to determine whether Florida Gulf Coast University (University) has effective internal controls, processes and procedures in place to ensure the completeness, accuracy, and timeliness of the data submissions to the BOG which support the University's Performance Based Funding Metrics.

Audit procedures included, but were not limited to, the evaluation of internal controls, processes, and procedures established to ensure the completeness and accuracy of data submissions to the Board of Governors, which support performance measures funding. Additionally, limited testing with a confidence level of 95% was performed of data elements comprising the Student Instruction File (SIF), Degree Awarded (SIFD), Hours to Degree (HTD), Student Financial Aid (SFA), and Retention (RET) data submissions which are used in computations for Metrics 3, 4, 5, 9a, and 9b of the BOG performance based funding model.

Overall, our audit indicates that there are no significant deficiencies in the processes implemented by the University that relate to the integrity of data that supports the performance based funding model. The data testing provides reasonable assurance that the data submitted to the Board of Governors is complete, accurate and timely.

We wish to express our appreciation to the Data Administrator and the Office of Institutional Research and Data Analytics (Institutional Research) staff for their continued cooperation and assistance. Their knowledge was instrumental in the successful completion of the audit. In addition to their knowledge, it should be noted that Internal Audit has seen continued growth and improvement over the past audit cycles that has led to more robust and enhanced processes utilized by Institutional Research. Internal audit would like to thank Institutional Research for all their help in demonstrating continuous improvement with this process.

This audit was conducted in accordance with the International Standards for the Professional Practice of Internal Auditing, issued by the Institute of Internal Auditors. The audit procedures provided a reasonable basis for our opinion and the following reportable observations and recommendations.

OBJECTIVES

A. Determine whether there are effective internal controls, processes, and procedures to ensure the completeness, and accuracy and timeliness of data submissions to the Board of Governors, which support performance measures funding.

B. Provide a reasonable basis of support for the President and Florida Gulf Coast University Board of Trustees (BOT) Chair to sign the representations included in the Performance Based Funding Data Integrity Certification, which will be submitted to the BOT and filed with the Board of Governors by March 1, 2025.

AUDIT SCOPE – End of Fieldwork was January 29, 2025.

- Review of Section 1001.92, Florida Statutes.

- Review of Board of Governors Regulations 1001(3)(f), 3.007 and 5.001.

- Review of applicable policies, procedures and control processes related to data submissions associated with performance data metrics.

- Review samples of relevant data submissions from September 29, 2023 to September 30, 2024. See Appendix A for the list of required submissions that relate to performance metrics during the audited time period.

- Detailed sample testing of data elements in the submissions submitted to the BOG was limited to the submissions files that support metrics 3, 4, 5, 9a and 9b. See Appendix B for metric definitions with supporting submissions and table elements for the tested metrics.

- Test of completeness of Pell grants, admitted students, degrees awarded and enrollment.

BACKGROUND

The BOG has broad governance responsibilities that affect administrative and budgetary matters for Florida's public universities. Beginning in fiscal year 2013 – 2014, the BOG instituted the Performance Funding Model which is based on ten performance metrics used to evaluate the institutions on a range of issues.

The 2023-2024 metrics are as follows:

1. Percent of Bachelor's Graduates Enrolled or Employed ($40,000+), One Year After Graduation
2. Median Wages of Bachelor's Graduates Employed Full-time, One Year After Graduation
3. Cost to the Student, Net Tuition & Fees for Resident Undergraduates per 120 Credit Hours
4. Four Year FTIC Graduation Rate
5. Academic Progress Rate, 2nd Year Retention with GPA Above 2.0
6. Bachelor's Degrees within Programs of Strategic Emphasis
7. University Access Rate, Percent of Undergraduates with a Pell-grant
8. Graduate Degrees within Programs of Strategic Emphasis
9a. Three-Year Graduation Rate for FCS Associate in Arts Transfer Student 9b. Six-Year Graduation Rate for Students who are Awarded a Pell Grant in their First Year (BOG Choice Metric)
10. Number of Bachelor's Degrees Awarded to Hispanic and African-American Students (BOT Choice Metric)

According to information published by the BOG in January 2023, the following are key components of the funding model:

- Institutions are evaluated on either Excellence or Improvement for each metric.
- Data is based on one-year data.

- The benchmarks for Excellence are based on the Board of Governors 2025 System Strategic Plan goals and analysis of relevant data trends, whereas the benchmarks for Improvement were determined after reviewing data trends for each metric.
- The Florida Legislature and Governor determine the amount of new state funding and an amount of institutional funding that will come from each university's recurring state base appropriation.

The amount of the state investment appropriated by the Legislature and Governor for performance funding will be augmented by an amount reallocated from the university system base budget. These "institutional base" funds are in turn, the cumulative recurring state appropriations the Legislature has appropriated to the BOG, and then from the BOG to each institution.

The highest point value for each metric is 10 points, with the exception of metric 9a. and 9b which have a highest point value of 5 points each. All 10 of the metrics have equal weight. There is a maximum of 100 possible points.

PBF Points	Plans	State Investment	Institutional Investment
70 and above (If 2 flat or down years only)	Student Success	Eligible 100%	Eligible 100%
60 - 69	Student Success	Eligible 50%	Eligible 100%
Below 60	Improvement	Eligible 50%	Eligible 100% (1 time only)

The BOG 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 State University System (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 Performance Based Funding (PBF) metrics is the responsibility of the University's Data Administrator in Institutional Research, and is scheduled to be uploaded to SUDS based on the BOG's Due Date Master Calendar. Data uploaded to SUDS are subject to edit checks to help ensure consistency with BOG-defined data elements, and accuracy of the information submitted. Once Institutional Research is satisfied that any edit errors have been fully addressed, Institutional Research makes an official submission of data files to the BOG. This process is depicted further in Appendix C.

Each file submission by Institutional Research includes an electronic certification in which the University's Data Administrator certifies that the data represents the University for the term(s) being reported as required by BOG Regulation 3.007.

AUDIT PROCEDURES

Audit procedures were conducted to address the Data Integrity Certification Representations provided by the BOG. These procedures included, but were not limited to:

- Identifying and evaluating key processes used by the Data Administrator and applicable University departments responsible for the data to ensure the completeness, accuracy, and timeliness of data submissions to the BOG.

- Interviewing key personnel responsible for the data being reported and submitted to the BOG. Reviewing key internal controls and processes in place over data input, Banner access, SUDS access, validation tables, data submission procedures, error resolution, staff training, and other controls specific to the department and submission of accurate and timely data.

- Verifying the accuracy of the data submitted to the BOG for Metric 3, Cost to the Student; Metric 4, Four Year FTIC Graduation Rate; Metric 5, Academic Progress Rate; Metric 9a, Three-Year Graduation Rate for FCS Associate in Arts Transfer Student; and Metric 9b, Six-Year Graduation Rate for Students who are awarded a Pell Grant in their First Year.

- Verifying the completeness of data files submitted for Pell grants, admitted students, degrees awarded and enrolled students.

- Testing for Metrics 3, 4, 5, 9a and 9b included data from 7 of 13 submissions during the audit period.

Submission Name	Table	Frequency of Submission	# of Elements Tested	Sample Items	Total Elements Tested for this Submission
Student Instruction File (SIF)	Enrollments	Fall, Spring, Summer	18	180	3,240
Student Instruction File (SIF)	Courses Taken	Fall, Spring, Summer	4	180	720
Student Instruction File (SIF)	Fee Waivers	Fall, Spring, Summer	3	180	540
Hours to Degree (HTD)	Hours to Degree	Fall, Spring, Summer	5	180	900
Hours to Degree (HTD)	Courses Taken	Fall, Spring, Summer	8	180	1,440
Student Financial Aid (SFA)	Financial Aid Awards	Annual	5	60	300

Degrees Awarded (SIFD)	Degrees Awarded	Fall, Spring, Summer	3	180	540
Retention (RET)	Cohort Changes	Annual	6	39*	234

*Size of population was a total of 39

- This corresponded to a 95% confidence level for our testing. During the prior year, we tested the data submissions for a different group of Metrics (6, 8, and 10), and each year, we select a different set of Metrics to test based on our annual risk assessment.

- Reviewing 2024 SUDS plan, metric definitions, and other key Performance Based Funding documents.

- Verifying submission files tested were submitted by the due date as identified on the SUDS website.

- Reviewing controls related to the access and provisioning of users associated with the SUDS System. This included reviewing the current processes utilized to grant and remove access in addition to reviewing the access controls surrounding the authorization of users logging in to the system. Furthermore, Internal Audit reviewed a current listing of all those individuals who have access to the SUDS system for appropriateness of access to the BOG's application portal.

- Reviewing current change management processes utilized for the correction of data and modification of code utilized to pull current data for the Performance Based Funding Metrics.

- Reviewing Banner access and termination procedures and quarterly Banner security reviews to determine whether controls are in place regarding access to Banner.

CONCLUSION

In our opinion, based upon the work performed, the internal controls, processes and procedures in place to ensure the completeness, accuracy, and overall timeliness of data submissions that affect performance-based funding metrics are operating effectively.

We believe our audit can be relied upon by the President and the Florida Gulf Coast University Board of Trustees as a basis for certifying representations to the Board of Governors related to the integrity of data required for its Performance Based Funding Model.

Audit Performed by: Jena Valerioti, MBA, CIA, Internal Auditor III, Ron Tortorello, MSIA, CISA, CISM, CRISC, CDPSE Internal Auditor III

Audit Supervised and Reviewed by: William Foster, MBA, CPA, CIA, CGAP, CFE, CRMA, CCSA, CISA, Director, Internal Audit

APPENDIX A
METRIC RELATED SUBMISSIONS

Due Date	Submission	Term or Year	Report Time Frame
9/29/2023	Degrees Awarded (SIFD)	Summer 2023	202305
10/6/2023	Student Financial Aid (SFA)	Annual 2022	20222023
10/20/2023	Admissions (ADM)	Fall 20232	202308
10/27/2023	Student Instruction File Preliminary (SIFP)	Fall 2023	202308
11/17/2023	Hours to Degree (HTD)	Annual 2022	20222023
1/12/2024	Student Instruction File (SIF)	Fall 2023	202308
1/19/2024	Degrees Awarded (SIFD)	Fall 2023	202308
1/26/2024	Retention (RET)	Annual 2022	20222023
3/8/2024	Admissions (ADM)	Spring 2024	202401
6/7/2024	Student Instruction File (SIF)	Spring 2024	202401
6/28/2024	Degrees Awarded (SIFD)	Spring 2024	202401
9/6/2024	Admissions (ADM)	Summer 2024	202405
9/20/2024	Student Instruction File (SIF)	Summer 2024	202405

Metric	Definition	Submissions and Table Elements
3. Cost to the Student Net Tuition & Fees for Resident Undergraduates per 120 Credit Hours	This metric compares the average sticker price and the average gift aid amount. The sticker price includes: (1) tuition and fees for resident undergraduates; (2) books and supplies (we use a proxy as calculated by the College Board); and (3) the average number of credit hours attempted by students who were admitted as an FTIC student who graduated with a bachelor's degree from a program that requires only 120 credit hours. The gift aid amount includes: (1) financial aid (grants, scholarships, waivers and third-party payments) provided to resident undergraduate students during the most recent academic year; (2) the total number of credit hours for those resident undergraduates. The average gift aid award per credit hour was multiplied by 120 and compared to the sticker price. Sources: State University Database System (SUDS), the Legislature's annual General Appropriations Act, and university required fees as approved by the Florida Board of Governors.	**Submission: SIF;** **Table: Enrollments** 01106 – Fee Classification – Residency 01060 – Student Classification Level 02041 – Demo Time Frame 01095 – University Identifier **Table: Courses taken** 01103 – Student Section Funding Flag 01097 – Student Section Credit 02041 – Demo Time Frame 01095 – University Identifier **Table: Fee Waivers** 01401 – Term Amount 02041 – Demo Time Frame 01095 – University Identifier **Submission: HTD** **Table: Hours To Degree** 01477 – Catalog – Hours to Degree 01413 – Type of Student at Time of Most Recent Admission 01412 – Term Degree Granted 02001 – Reporting Time Frame 01095 – University Identifier **Table: Courses To Degree** 01482 – Course Institution Code 01484 – Course System Code 01485 – Course Grouping Code 01489 – Credit Hour Usage Indicator 01459 – Section Credit 02065 – Excess Hours Exclusion 02001 – Reporting Time Frame 01095 – University Identifier **Submission: SFA** **Table: Financial Aid Awards** 01253 – Financial Aid Award Program Identifier 02040 – Award Payment Term 02037 – Term Amount 01095 – University Identifier

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 admit' students who were admitted as a degree-seeking student prior to high school graduation. Students who were enrolled in advanced graduate programs during their 4th year were excluded. Source: State University Database System (SUDS).	**Submission: SIF** **Table: Enrollments** 01063 – Current Term Course Load 01067 – Last Institution Code 01068 – Type of Student at Date of Entry 01060 – Student Classification Level 01112 – Degree - Highest Level Held 01107 – Fee Classification – Kind 01420 – Date of Most Recent Admission 01413 – Type of Student at Time of Most Recent Admission 01411 – Institution Granting Highest Degree 02001 – Reporting Time Frame 01095 – University Identifier **Submission: SIFD** **Table: Degrees Awarded** 01081 – Degree – Level Granted 01412 – Term Degree Granted 01095 – University Identifier **Submission: RET** **Table: Ret_Cohort_Chgs** 01429 – Cohort Type 01465 – Student-Right-to-Know (SRK) Flag 01442 – Cohort Adjustment Flag 01095 – University Identifier 02001 – Reporting Time Frame 01458 – FTIC Full-Time Indicator-Entering Term
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 next Fall term with 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).	Same as elements as PBF4 + additional elements for SIF Enrollments below **Submission: SIF** **Table: Enrollments** 01085 – Institutional Hours for GPA 01086 – Total Institutional Hours Grade Points Related: 01088 – Term Credit Hours for GPA 01089 – Term Credit Hours Earned 01090 – Term Grade Points Earned

9a. Three-Year Graduation Rate for FCS Associate in Arts Transfer Student	This transfer cohort is defined as undergraduates entering in fall term (or summer continuing to fall) from the Florida College System with an Associate in Arts (AA) degree. The rate is the percentage of the initial cohort that has either graduated from the same institution by the summer term of their third academic year. Both full-time and part-time students are used in the calculation. Students who were flagged as enrolled in advanced graduate programs that would not earn a bachelor's degree are excluded. Source: State University Database System (SUDS)	**Same elements as PBF4**
9b. Six-Year Graduation Rate for Students who are Awarded a Pell Grant in their First Year	This metric is based on the percentage of students who started in the Fall (or summer continuing to Fall) term and were enrolled full-time or part-time in their first semester and who received a Pell Grant during their first year and who graduated from the same institution by the summer term of their sixth year. Students who were flagged as enrolled in advanced graduate programs that would not earn a bachelor's degree were excluded. Source: State University Database System (SUDS).	**Same elements as PBF4 plus** **Submission: SFA** **Table: Financial Aid Awards** 01253 – Financial Aid Award Program Identifier 02040 – Award Payment Term 02001 – Reporting Time Frame 01095 – University Identifier

APPENDIX C

Overview of the University SUDS Submission Data & Process Flows