July 25, 2012

Dr. Michael Johnson  
Vice President  
Southern Association of Colleges and Schools  
Commission on Colleges  
1866 Southern Lane  
Decatur, GA 30033-4097  

Dear Dr. Johnson:

I am transmitting Florida A&M University’s response to your June 25, 2012 request for information regarding the institution’s compliance with Comprehensive Standards 3.4.5 (academic policies), 3.9.1 (student rights), 3.10.3 (control of finances), and 3.11.2 (institutional environment).

Please let me know if any additional information or action is required.

Sincerely,

Larry Robinson  
Interim President

Enclosures

cc: Dr. Maurice Edington, Accreditation Liaison
Florida A&M University

Office of the President
1601 Martin Luther King Jr. Blvd.
Suite 400
Tallahassee, Florida 32307
(850) 599-3225

CS 3.4.5 - Academic Policies
Narrative

Date of Submission: July 25, 2012
Response to SACSCOC June 25, 2012 Letter

Contact Information:
Dr. Larry Robinson
Interim President
(850) 599-3225
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Dr. Maurice Edington
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CS 3.4.5 - Academic Policies

The institution publishes academic policies that adhere to principles of good educational practice. These policies are disseminated to students, faculty, and other interested parties through publications that accurately represent the programs and services of the institution.

Specific SACSCOC Concern:

Please provide documentation of your policies governing student and non-student eligibility to participate in university-sanctioned activities (clubs, teams, cheerleading, student trips, service projects, and the like). Include policies governing band participation. You do not need to include policies governing athletic participation in NCAA-related events. Address past, present, and planned future enforcement of these policies, especially concerning the band. If new policies have been instituted in the past two years, be explicit as to changes that have occurred.

General University Response to CS 3.4.5

Florida A&M University (FAMU) publishes academic policies that adhere to principles of good educational practice as established by the Board of Governors for the State University System of Florida (FLBOG), Southern Association of Colleges and Schools Commission on Colleges, and specialized accrediting bodies such as ABET, the National Council for Accreditation of Teacher Education (NCATE), the National Architecture Accrediting Board (NAAB), and the Commission on Accreditation in Physical Therapy Education (CAPTE). These policies are disseminated to students, faculty, staff, parents and other interested parties, through online publications and via hard copy, that accurately represent the programs and services of the institution. In addition, some of FAMU’s colleges, schools, and programs publish specific academic policies and procedures for their students that are also available online. Examples include the School of Graduate Studies and Research, the College of Pharmacy and Pharmaceutical Sciences, the FAMU/FSU College of Engineering, the Department of Computer Information Sciences, the School of Architecture, the School of Allied Health Sciences, the College of Law, and the College of Education.

The University Catalog (www.famu.edu/catalog) contains information concerning admission, registration, financial and academic policies, and degree requirements. It is published online via the University website and is revised every two years. All new and
transfer students are informed about the University Catalog during orientation sessions.

Under the auspices of the Office of the Provost, the Academic Policies Review Committee is responsible for providing a critical review of proposed policies or revisions as described in the "Academic Policies Creation Flow Chart" [1]. The Committee consists of faculty representation from all colleges and schools at the University. Also, it includes members from the Office of Academic Affairs, Registrar's Office, Faculty Senate and the Student Government Association (SGA). The Committee meets periodically to review existing or proposed academic policies. It makes recommendations to the Provost, through the chair of the Academic Policies Review Committee, whether to accept, reject, or modify new policies or make revisions to existing policies. The Provost, on behalf of the University President, presents recommended policies to the Academic Affairs Committee of the Board of Trustees (BOT). The Academic Affairs Committee makes its recommendation to the entire BOT for final approval. Approved policies are then disseminated to the university community through a variety of publications including the University website (www.famu.edu), University Catalog (www.famu.edu/catalog), Faculty Handbook (www.famu.edu/index.cfm?facultysenate&FacultyHandbook), and Student Handbook [2].

The Student Handbook is presented to all new students during orientation sessions and they are directed to the university website. In these sessions, students learn more about key policies as explained by representatives from the Offices of the Provost, Registrar, Financial Aid, and Student Affairs. Academic policies and procedures concerning the Family Educational Rights and Privacy Act (FERPA), Student Code of Conduct, and Observance of Religious Holy Days by Students are also described in the Student Handbook. The Student Handbook is updated by the Office of Student Affairs every two years. During the annual university-wide and departmental graduate student orientation, graduate students are given handbooks, manuals, and links to webpages which delineate all policies and procedures under which they will be governed while in graduate school. The Faculty Handbook is located on the University website; new faculty members receive instructions on how to access the Handbook at the Faculty
Planning Conference offered at the beginning of each academic year. The Handbook includes the University's history, governance and organization, administrative and student related policies, and information on tenure and promotion. Faculty and Academic policies are described in Sections II and III of the Faculty Handbook. Revisions to the Faculty Handbook are initiated by the Faculty Senate and approved by a vote of the Faculty Senate.

The University has specific guidelines and eligibility requirements for university-sanctioned student organizations. These guidelines, which are described in University Regulation 2.030 [3] and the Student Handbook (pages 41-46), are disseminated to students and the campus community via the University's website. In addition, the University has an Anti-Hazing policy, University Regulation 2.028, which prohibits hazing activities on the part of any student(s), groups of students, or organizations affiliated with the University [4]. University Regulation 2.028 also stipulates that all University personnel with knowledge of information or activities related to hazing are required to report the information to the FAMU Department of Public Safety within 24 hours. University Regulations 2.028 and 2.030 are also included in the Student Handbook.

University Response to Specific CS 3.4.5 Concerns

Clubs and Organizations
During the 2011-12 academic year the University recognized and supported 144 student organizations [5]. The various types of university-sanctioned student organizations include but are not limited to Campus Wide, Departmental, Academic-related, City/County/State, Military-related (Pershing Rifles and Pershing Angels), Performing Arts, Cultural, Political, Religious, Recreational, and Volunteer Service. The Marching Band is a component of the Department of Music and is not classified as a student organization.

As mentioned above, University policies and procedures governing participation in university-sanctioned student clubs and organizations are described in the Student
FAMU Response to SACSCOC June 25, 2012 Letter – CS 3.4.5

Handbook and University Regulation 2.030 [3], which are disseminated to students and the campus community via the University website. University policy requires that all student clubs and organizations must register annually with the Office of Student Activities (OSA). The OSA holds workshops and seminars throughout the academic year to ensure that student participants and club advisors are aware of university policies and procedures [6]. Participation in policies and procedures workshops are mandatory.

The Cheerleading Handbook describes the eligibility guidelines for participation in the FAMU Cheerleading Squad [7]. Currently enrolled and incoming freshman students at FAMU and Tallahassee Community College (TCC) are eligible for participation in cheerleading. Students enrolled at FAMU and TCC are eligible for participation in intramural sports. Additionally, students enrolled at FAMU and Tallahassee Community College are also eligible for participation in service projects.

Eligibility Requirements for Clubs and Organizations:

Prior to 2012, the requirements for participation in student clubs and organizations were as follows:

- Students must be officially enrolled and in good standing at the University;
- Individuals not enrolled at the University are not eligible for participation;
- Students must maintain a minimum GPA of 2.0;
- Only full time, officially registered students shall be eligible to serve as appointed or elected officers in student organizations;
- All clubs and organizations must have an advisor who is employed full time at the University (minimum of three years) as a faculty, staff and/or administrator.

Beginning 2012, the University enhanced the eligibility guidelines to include more rigorous academic requirements as described below [2]:

- Students must have earned 12 or more credit hours;
FAMU Response to SACSCOC June 25, 2012 Letter – CS 3.4.5

- Students must maintain a minimum GPA of 2.5;
- Students must earn a minimum of 30 hours of community service hours;
- Students must attend five (5) Personal and Professional Development Training sessions or workshops through the Office of Student Activities.

These changes in eligibility requirements were made to enhance the freshman year experience and in an effort to increase student retention and progression. First semester freshman students will be prohibited from becoming official members of university-sanctioned clubs and organizations. However, first semester students may still participate as members and/or hold offices in academic clubs or organizations that do not have an extensive intake process. In August 2011, the Office of Student Activities initiated this process upon reviewing best practices nationally. An Intake Review Committee was formed during the Spring of 2012 to gauge the opinions and concerns of the various “potentially affected” groups of students, faculty and staff. A total of five meetings were held and the proposed changes were eventually presented to the University President who is currently reviewing them for final approval. The most noted change from the four above listed is the fact that 24 credit hours will be required for joining a club or organization basically eliminating most freshmen participation.

Enforcement:
Any organization in violation of the guidelines will not be certified as a student organization. Eligibility requirements of the members in each organization are confirmed by the advisor during the certification of the organization in the beginning of the academic year.

Music Groups
The FAMU Marching Band, known as the Marching “100,” is housed in the Department of Music, along with other student music ensembles (Flute Choir, Concert Choir, Jazz Ensemble, Percussion Ensemble, Saxophone Quartet, and Symphonic Band). Ensembles are University courses and, therefore, do not fall under the clubs and organizations structure. Each course instructor of record reports to the Department of Music Chair.
All of the music ensembles are governed by the same set of department and University guidelines. In response to the recent hazing related events, the University has conducted a detailed review of existing policies and procedures that govern student participation in music ensembles and associated travel. The narrative below outlines the University policies and procedures that were in place prior to the recent hazing related events and a description of the policies and procedures that have been developed and/or implemented after the hazing related events.

**Academic Policies Specific to the Marching Band in Place Before the November 2011 Incident:** The Marching Band eligibility requirements that were in place prior to November 2011 are described in the Band Handbook and Constitution [8]. The Band Handbook describes the policies and regulations that govern band participation and operation. The Band Handbook is provided to each member of the band during their mandatory participation in the annual two-week Pre-Drill program, that takes place in August, prior to the start of the fall semester [9]. During the Pre-Drill program, students participate in anti-hazing workshops, in addition to the band training activities. As described in the Band Handbook, participation in the Marching Band was limited to students who were properly enrolled at FAMU, Florida State University (FSU), or Tallahassee Community College (TCC). Florida State University and TCC students were required to enroll in a Marching Band course [10] at FAMU (MUN 1110 or MUN 3133) in order to be eligible for band participation, as noted on page 6 of the Band Handbook.

**Academic Policies in Place After the November 2011 Incident:** Following the November 2011 hazing incidents, the University President formed a Crisis Management Team (CMT) to conduct a thorough review of existing University policies and procedures related to hazing, the Marching Band, and the eligibility requirements for all campus student organizations [11]. Over the next several months, the University President, CMT, and the FAMU BOT developed a set of comprehensive measures and actions to enhance existing University policies and procedures governing the operation
of clubs, organizations, and The Marching Band. These measures are outlined in the University's Anti-Hazing Plan [12], and they are currently being implemented as described below.

Administrative Actions:

(1) On November 22, 2011, the President announced that the Marching Band, and all other music groups under the auspices of the Department of Music would be suspended indefinitely, pending further review [13]. The President subsequently announced that the Marching Band would remain on suspension throughout the 2012-13 academic year while the University worked to implement enhanced policies and procedures governing band operations [14].

(2) The administrative position of Executive to the President for Anti-Hazing was established and subsequently advertised on the University's employment website beginning July 18, 2012 [15]. The Executive Assistant will report to the University President and will be responsible for coordinating the University's anti-hazing efforts. Specific duties will include: assessing the reporting and evaluation of complaints/reports regarding students who have allegedly violated the code of conduct relating to hazing; conducting investigative briefings with the President; monitoring the coordination of student briefings, hearings, and records/files maintenance; drafting of appropriate reports and letters; evaluating and implementing safety and educational programming; maintaining a database; and compiling statistical hazing related reports and other data requests for external or internal entities. The Executive Assistant will also monitor the maintenance of official records of anti-hazing agreements, police reports, judicial reports, and longitudinal hazing data and work collaboratively with various University units in effectuating various conduct and safety related programming and activities.

(3) The administrative position of Music Department Compliance Officer was established and subsequently advertised on the University's employment website beginning July 18, 2012 [16]. The Compliance Officer will report to the Executive Assistant for Anti-Hazing and will be responsible for ensuring the overall
compliance of the music department and music organizations with University policies and procedures. Specific duties will include: monitoring compliance with the provisions of the Student Code of Conduct [17] and Due Process [18] Regulations to include anti-hazing and university imposed sanctions; academic eligibility requirements; meetings and practice limitations; travel; designation and collection of fees; and training and certification of faculty, staff and students. The Compliance Officer shall also monitor individuals and organizations under sanction by the university and national organizations. The Compliance Officer will also be responsible for verifying the completion of all required official certification forms; monitor student travel and practice related activities; maintain certification records; and report all instances of non-compliance to the Executive Assistant, Dean, Music Department Chair, and Directors.

(4) A new organizational structure (Figure 1 below) and revised operating guidelines have been implemented within the Department of Music [12]. Under the previous administrative structure, the department chair also simultaneously served as the director of all ensembles within the department. The revised structure creates individual directors for each ensemble, who will each report to the department chair. The former Director of Bands also simultaneously served in the capacity of department chair. The revised procedures prohibit the department chair from serving as director of any other ensemble. The department will revise its existing handbook to include the eligibility requirements, code of conduct and a mandatory anti-hazing pledge. The chair, directors and all faculty and staff in the music department along with all teaching assistants, research associates and volunteers are required to receive training provided to advisors of all student organizations and take an anti-hazing pledge provided by the Division of Student Affairs. Adherence to these requirements will be monitored and reported to the administration through the Music Department Compliance Officer.
Figure 1.
## Enhanced Eligibility and Requirements:

The table below summarizes the enhancements that have been made to the eligibility requirements for participation in the Marching Band.

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<thead>
<tr>
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<td><strong>Limitation on number of practice hours:</strong> Practice hours shall be limited to 20 hours per week. No group practices shall be conducted without the supervision of music department staff or in any unauthorized locations.</td>
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<td>Music Ensemble members must be enrolled as full-time students at Florida A&amp;M University, Florida State University, or Tallahassee Community College to be eligible to practice and perform.</td>
<td><strong>Non-FAMU students ineligible for band participation:</strong> Music Ensemble members must be enrolled as full-time students at Florida A&amp;M University to be eligible to practice, perform, receive financial aid or scholarships.</td>
</tr>
<tr>
<td>No maximum number of years of eligibility</td>
<td><strong>Limitation on years of eligibility:</strong> A maximum of four years of eligibility will be allowed for participation in Music Department bands.</td>
</tr>
<tr>
<td>No established criteria for academic progression for eligibility.</td>
<td><strong>Academic progression requirements:</strong> Students must adhere to the following progression standards in order to maintain eligibility: (a) Twenty-four-semester hours of academic credit prior to the start of the second year of enrollment; (b) Eighteen-semester hours of academic credit since the beginning of the previous fall term or since the beginning of the preceding regular two semesters; and (c) Six-semester hours of academic credit during the preceding regular academic term (e.g., fall semester) in which the student has been enrolled full time.</td>
</tr>
</tbody>
</table>
Procedures for Group Travel:
As described in the Anti-Hazing Plan [12], travel by students, faculty and staff shall conform to all existing University policies and procedures. Additional requirements for travel by music department organizations shall include: pre-approval of all students, faculty, staff and non-employees by Directors, the Music Department Chair and the Dean prior to initiating the travel approval process; assessment of the adequacy of chaperones to provide oversight of the group by the Music Department Chair and the Dean; assessment of adequate funding to support the proposed travel by the Music Department Chair and the Dean; and certification of each traveler by the Compliance Officer using official University issued identification cards and rosters provided by the University Registrar showing compliance with academic and course enrollment requirements. Travel Advances shall be provided in accordance with University policy only to travelers certified by the Compliance Officer. Payments must be signed for by each individual traveler. All travel records shall be housed by the Chair, the Dean’s Office and in the office of the University Comptroller.
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<tr>
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<tr>
<td>1</td>
<td>Academic Policies Flow Chart</td>
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<td>2</td>
<td>Student Handbook, &quot;The Fang.&quot;</td>
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<td>3</td>
<td>University Regulation 2.030 – Student Activities</td>
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<td>4</td>
<td>University Regulation 2.028 – Anti-Hazing</td>
</tr>
<tr>
<td>5</td>
<td>Registered Clubs and Organizations for 2011-12</td>
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<td>6</td>
<td>List of Workshops</td>
</tr>
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<td>7</td>
<td>Cheerleading Handbook</td>
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<td>8</td>
<td>Band Handbook</td>
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<td>9</td>
<td>Pre-Drill Packet</td>
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<tr>
<td>10</td>
<td>Marching Band Course Descriptions</td>
</tr>
<tr>
<td>11</td>
<td>Crisis Management Team Meeting Agenda – December 1, 2011</td>
</tr>
<tr>
<td>12</td>
<td>Anti-Hazing Plan</td>
</tr>
<tr>
<td>13</td>
<td>Band Suspension Announcement – November 22, 2011</td>
</tr>
<tr>
<td>14</td>
<td>Band Suspension Press Release – May 14, 2014</td>
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<tr>
<td>15</td>
<td>Position Vacancy – Executive Assistant to the President</td>
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<tr>
<td>16</td>
<td>Position Vacancy – Music Compliance Director</td>
</tr>
<tr>
<td>17</td>
<td>University Regulation 2.012 – Code of Conduct</td>
</tr>
<tr>
<td>18</td>
<td>University Regulation 2.013 – Due Process</td>
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Florida A&M University

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CS 3.9.1 – Statement of Student Rights and Responsibilities

Narrative

Date of Submission: July 25, 2012
Response to SACSCOC June 25, 2012 Letter

Contact Information:
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SACSCOC Liaison
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maurice.edington@famu.edu
CS 3.9.1 – Statement of Student Rights and Responsibilities

The institution publishes a clear and appropriate statement of student rights and responsibilities and disseminates the statement to the campus community.

Specific SACS Concern:

Please provide documentation of your policies governing student and non-student eligibility to participate in university-sanctioned activities (clubs, teams, cheerleading, student trips, service projects, and the like.) Include policies governing band participation. You do not need to include policies governing athletic participation in NCAA-related events. Address past, present, and planned future enforcement of these policies, especially concerning the band. If new policies have been instituted in the past two years, be explicit as to changes that have occurred.

General University Response to CS 3.9.1

Sections 1002.21(4) and 1006.50 Florida Statutes require that each state university and community college compile and provide to its students an up-to-date student handbook that includes, but is not specifically limited to, student rights and responsibilities [1][2]. Consequently, Florida A&M University (FAMU) disseminates through its Student Handbook [3], regulations and clear and appropriate information regarding student rights and responsibilities to the University community. These rights and responsibilities, as outlined in The Student Handbook [3], include information regarding:

- Academic Grievances
- Anti-hazing (revised June 2012)
- Due Process and Other Rights and Responsibilities
- Non-Discrimination
- Student Code of Conduct
- Federal Educational Rights and Privacy Act
- Other Policies and Expectations

The Office of Student Life through the Office of Judicial Affairs has primary responsibility for developing, evaluating, implementing, and disseminating this information. University Regulations 2.012 (Student Code of Conduct) [4] and 2.013 (Due Process) [5] fall within the purview of the Office of Judicial Affairs. These regulations are evaluated and disseminated on an annual basis. Both regulations are published in the Student
Handbook [3], and are available on the University website (http://www.famu.edu/regulations/2.012Conduct,StudentCodeof.pdf and http://www.famu.edu/regulations/2.013DueProcess,OtherRightsandResponsibilities.pdf, respectively).

Any and all changes to these regulations must be submitted for approval to the FAMU University Board of Trustees (BOT) after appropriate notice has been provided to the University community. All new and transfer students are instructed during student orientation regarding their rights and responsibilities. Students are informed of the availability of the Student Handbook [3] online via the University website (http://www.famu.edu/StudentLife/STUDENT%20HANDBOOK%20(FANG)%202012-2014.pdf). Additionally, students are informed of FAMU's Non-Discrimination Policy and Discrimination and Harassment Complaint Procedures, University Regulation 10.103 [6], which is available on the University's website (http://www.famu.edu/regulations/Regulation10.103Non-DiscriminationPolicyandDiscriminationandHarassmentComplaintProcedures.pdf), and discussed in the Student Handbook [3]. FAMU's Non-Discrimination Policy and Discrimination and Harassment Complaint Procedures are within the purview of the Office of Equal Opportunity Programs.

As stated in the FAMU Catalog [7], each college, school, and/or academic unit within the University has internal procedures addressing student rights and responsibilities pertaining to academic matters. The student is expected to follow the procedures established by the college, school, and/or academic unit in which the student is pursuing his or her course of study; however, academic grievances regarding a course grade must be filed with the college, school and/or academic unit in which the course is offered. The procedures are located in the administrative offices of the Dean or Director for each college, school and/or academic unit. Because each college, school and/or academic unit has an established procedure, students should contact the appropriate academic area to initiate implementation.
Students who live in University Housing are informed of housing policies and their rights as residential students. The Residence Life Guidebook [8] references the Student Code of Conduct and applicable state and federal laws. The Housing Agreement [9] (http://www.famu.edu/index.cfm?a=Housing&p=HousingContractualAgreement), which students sign, includes the following statement: "By signing the Housing Agreement, the student agrees to be responsible for knowing and observing University regulations, procedures, as well as guidelines for residential facility living that may be published by the Housing office, and all applicable federal, state and local laws." A copy of the Housing Handbook is distributed to all residents during check-in. Both Housing Agreement and Residence Life Guidebook are available on the University website (http://www.famu.edu/regulations/Regulation%202%20001%20Final%205-12-11.pdf) and Residence Life Guidebook, respectively). Students may contact the University Housing Department to obtain copies of the aforementioned policies.

All students traveling, domestically or internationally, must complete a Domestic or International Travel Participation Agreement (D/ITPA) [10][11], a copy of which may be obtained from the appropriate academic dean’s office, the Office of Student Activities or the Office of Risk Management. The completed original document (D/ITPA) is kept in the office of the unit or organization sponsoring the trip. Additionally, students/student groups representing the University on out-of-town trips must submit to the director of the responsible/sponsoring department, and/or the appropriate academic dean’s office at least (3) days prior to departure, a roster to include names and student identification numbers of persons traveling, mode of travel, destination, date of departure, expected date or return and how they may be reached in case of an emergency. Said information must be reviewed as to completeness or accurateness by the Advisor of the sponsoring organization. Travel Documents are also in the Risk Management Operation Manual [12]. Information regarding Domestic and International Travel for students is also included in the Student Handbook [3]. As previously stated, the Student Handbook is available on the University’s website.
University Response to Specific CS 3.9.1 Concerns

Academic Policies in Place After November 2011 Incident

In response to the November incident, the University suspended the Marching Band through 2013, and developed an Anti-Hazing Plan [13], which was presented to the FAMU Board of Trustees on June 6, 2012 [14]. The plan includes a series of policy and procedural changes. To monitor and enforce overall academic policies for student participation in the Music Department, the following positions were created: (1) Executive Assistant to the President for Anti-Hazing and (2) Music Department Compliance Officer. The positions were advertised on July 18, 2012.

The Compliance Officer shall be responsible for ensuring the overall compliance of the Music department with University policies and procedures and Music Department guidelines specified in approved handbooks [15] [16]. The Compliance Officer’s scope of work shall include, but is not be limited to, monitoring compliance with the provisions of the Student Code of Conduct [4], Due Process [5], and Anti-Hazing [6]. Regulations to include anti-hazing and university imposed sanctions; academic eligibility requirements; meetings and practice limitations; travel; designation and collection of fees; and training and certification of faculty, staff and students. The Compliance Officer shall also monitor individuals and organizations under sanction by the University and national organizations. The Compliance Officer shall also verify the completion of all required official certification forms including student physical examinations where appropriate; monitor student travel and practice related activities; maintain certification records; and report all instances of non-compliance to the Executive Assistant, Dean, Music Department Chair, and Directors.

The University has implemented a new organizational structure with the director of marching and pep bands reporting to the music department chair. The chair of the department shall not simultaneously serve in the director position and department chair as was done previously.
Eligibility of a Student

Students are encouraged to participate and become involved in student clubs and organizations. Only currently and officially registered students in good standing, with a minimum GPA of 2.0 shall be eligible for active membership status in student clubs and organizations. The Marching Band does not fall under the rubric of student clubs and organizations. Previously, the Band was not subject to the minimum GPA of 2.0. New requirements for participation in the Marching Band have been developed and are described in the Anti-Hazing Plan [13]. Academic or Non-Academic organizations will be certified through the Office of Student Activities. All academic organizations will be the responsibility of the respective academic unit/area.

Effective Fall Semester 2012, in order to participate in any club or organization, a student must fully comply with the following requirements: earn 24 or more semester credit hours; a minimum grade point average (GPA) of 2.5; earn a minimum of 30 hours of community service hours; and attend a five (5) session Personal and Professional Development Training course or workshop through the Office of Student Activities (OSA). Only full time, officially registered students shall be eligible to serve as appointed or elected officers in registered student organizations. It is the responsibility of the advisor to the organization to ensure compliance with this requirement. Additional requirements for joining an organization may be obtained from the Office of Student Activities or the respective organization. Refer to page 42 of the Student Handbook, which is found on the University website [3].

Subsequent to the November hazing death of one of the drum majors and the resulting suspension of the Marching Band, the University Leadership Team and the Internal Crisis Management Team (CMT) determined that it was appropriate to take the opportunity to assess the overall intake (membership) process of clubs and organizations in general and to ensure continuous compliance by those entities with current policies and procedures.¹ Student eligibility to participate in the Music

¹ All organizations and clubs were and are still allowed to conduct regular meetings and activities/events except membership intake. A membership intake committee was established by the University to review
Department's ensembles, which includes the Marching Band, is addressed in the Anti-Hazing Plan [13]. The Band is not considered a club or organization; rather, it is an integral component of the Music Department.

New requirements for participation in the Marching Band have been developed and are described in the Anti-Hazing Plan, which will take effect upon the lifting of the suspension. These requirements are described below:

**Academic Eligibility Requirements**

The details of eligibility requirements for membership in music department organizations shall be included in the department's handbook. These criteria shall only include factors pertaining to academic standards; musicianship; practice, performance and class attendance and decorum; student code of conduct; physical condition ascertained by physical examination; and medical consent and liability release. Academic requirements for course enrollment, prerequisites, and other degree requirements are included in the University Catalog.

requests from academically affiliated clubs and organizations and to determine if there would be irreparable harm caused to the clubs or organizations if their membership intake was not reinstated during the Spring 2012 period of suspension. All new membership intakes for clubs and organizations will resume Fall Semester 2012.
Enhanced Eligibility and Requirements:
The table below summarizes the enhancements that have been made to the eligibility requirements for participation in the Marching Band.

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Travel
Travel by students, faculty and staff shall conform to all existing University policies and procedures. Additional requirements for travel by Music Department organizations shall include pre-approval of all students, faculty, staff and non-employees by Directors, the
Music Department Chair and the Dean prior to initiating the travel approval process; assessment of the adequacy of chaperones to provide oversight of the group by the Music Department Chair and the Dean; assessment of adequate funding to support the proposed travel by the Music Department Chair and the Dean; and certification of each traveler by the Compliance Officer using official University issued identification cards and rosters provided by the University Registrar showing compliance with academic and course enrollment requirements.

Travel Advances shall be provided in accordance with University policy only to travelers certified by the Compliance Officer. Payments must be signed for by each individual traveler. All travel records shall be housed by the Chair, the Dean’s Office and in the office of the University Comptroller.

The University publishes a clear and appropriate statement of student rights responsibility, policies governing student and non-student eligibility to participate in university-sanctioned activities. Moreover, the University has instituted enhanced measures to strengthen the enforcement of University policies and procedures, especially those concerning the Band.
<table>
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<th>DOCUMENTATION</th>
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<tr>
<td>1. Florida Statutes, Section 1002.21(4), Post Secondary Student and Parent Rights</td>
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<td>2. Florida Statutes, Section 1006.50, Post Secondary Student Handbooks</td>
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<td>4. University Regulation 2.012, Student Code of Conduct</td>
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<td>6. University Regulation 10.103, Non-Discrimination Policy and Discrimination and Harassment Complaint Procedures</td>
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<td>8. University Housing and Residence Life Guide Book</td>
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<td>9. Florida A&amp;M University Housing Agreement</td>
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<td>10. FAMU Domestic Travel Agreement Form</td>
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<td>11. FAMU International Travel Agreement Form (<a href="http://www.famu.edu/oied/UserFiles/File/Forms/Eaep/Intl-Travel-Agreement-Form.pdf">http://www.famu.edu/oied/UserFiles/File/Forms/Eaep/Intl-Travel-Agreement-Form.pdf</a>)</td>
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<td>13. FAMU Anti-Hazing Plan</td>
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<td>14. Agenda for Board of Trustees June 6, 2012 Meeting</td>
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<td>15. Music Department Handbook</td>
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<td>16. Band Handbook and Constitution</td>
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Florida A&M University

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CS 3.10.3 – Control of Finances

Narrative

Date of Submission: July 25, 2012
Response to SACSCOC June 25, 2012 Letter

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CS 3.10.3 – Control of Finances

The institution exercise appropriate control over its financial resources

Specific SACS Concern:

Please summarize the current state of your investigation into the alleged issues related to financial fraud (some of these were announced last November), and actions taken to correct the problems uncovered in the Internal Auditor function.

General Response to CS 3.10.3

Florida A&M University (FAMU) exercises appropriate control over its financial resources. The basis for financial controls within FAMU is established by Florida Statutes [1] and the FAMU Board of Trustees (BOT) policies [2], which includes Guiding Principles for Fiscal Affairs. The University’s financial control is maintained with fiscal policies and procedures, available both in hard copy and on the university’s website [3]. Guiding all financial transactions, these procedures comply with FAMU BOT, Florida Board of Governors (BOG), and state and federal guidelines and regulations. It is important to note that the FAMU Administrative and Financial Services Division is continuously reviewing, evaluating, revising and developing additional policies and procedures to enhance financial controls.

Additionally, the University’s strategic plan outlines five strategic priorities that are designed to actualize FAMU’s mission [4]. It aims to create an environment where operational policies, procedures, and processes are continuously improved. Accordingly, management has outlined specific goals to improve administrative processes throughout the University; to reduce institutional risk through risk management assessment and annual audit plans; to develop a University audit plan annually [5]; and to develop and implement business re-engineering initiatives [6]. The audit plan is designed to ensure compliance with applicable laws, rules, regulations, policies and procedures. Moreover, with the appropriate assessment and evaluation of internal controls, the plan contributes to the safeguarding of University assets against waste, loss or irregularities. Together these goals are intended to actualize FAMU’s mission as well as to ensure that the University exercises appropriate control over its
financial resources. In 2011-12, in its business re-engineering initiatives, Transformation Through Technology Enhancement (T3E) [7], the University established the Office of Administrative Services Assistance Program (ASAP) [8] to provide assistance to FAMU’s colleges/schools and administrative units in all business processes. ASAP’s purpose is to be the first line of response to resolving departmental fiscal and administrative issues, and serves as liaison to the University’s centralized units to include Human Resources, Controllers Office, Budget and Purchasing. In addition, ASAP also identifies, analyzes and evaluates work-flow processes to recommend improvements to existing policies, practices and procedures.

Fiscal Policies and Procedures
The Division of Administrative and Financial Services (DAFS) is responsible for enforcing fiscal policies and procedures as well as conducting its operations in compliance with them. The DAFS supervises the Offices ASAP, Business and Auxiliary Services, Controllers, Finance, University Budget, Plant Operations and Maintenance, Construction and Facilities Management, Administrative Services, and Purchasing [9].

The University received an unqualified opinion from the Auditor General’s office for the fiscal year ending June 30, 2011 [10]. The Administrative and Financial Division, under the auspices of the Chief Financial Officer (CFO), has placed qualified persons with strong financial backgrounds to manage critical areas within the Division. These qualified individuals have many years of experience in accounting practices and principles, financial management and higher education [11] [12].

The FAMU BOT maintains an internal audit and compliance function that is an integral component of the governance structure. The Division of Audit and Compliance (A&C) [13] provides insight into the mitigation of business risk to assist the BOT and University management in the effective discharge of their responsibilities as related to the University policies, processes, programs, information systems, internal controls, and management reporting.
The A&C provides independent, objective assurance and consulting services designed to add value and improve the University’s operations. It helps the University accomplish its objectives by bringing a systematic, disciplined approach to evaluate and improve the effectiveness of risk management, control, and governance processes.

The A&C serves as a proactive business partner with University management by evaluating business processes, controls, compliance mechanisms and technologies to ensure:

- Business risks are appropriately identified and managed;
- Assets and resources are properly controlled;
- Operational, financial, and managerial information is accurate and reliable;
- University actions are in compliance with policies, procedures, standards, and state and federal laws and regulations;
- Effective coordination and cooperation is provided to external auditors to avoid duplication of effort;
- Allegations of fraud, waste, and abuse, and complaints received from the Chief Inspector General and Board of Governors (BOG) are appropriately investigated; and
- Quality and continuous improvement are fostered in the University’s control process.

Response to Specific CS 3.10.3 Concerns

Specific SACSCOC Concern:

Please summarize the current state of your investigation into the alleged issues related to financial fraud (some of these issues were announced last November), and actions taken to correct the problems uncovered in the Internal Auditor function.

Financial Fraud Investigation

In light of the recent hazing incident, several inquiries have been made by external investigative entities, specifically, the Florida Department of Law Enforcement (FDLE) and the Florida Board of Governors (BOG). FDLE informed the FAMU BOT on
December 2, 2012, of its intent to launch a criminal investigation as a result of the events that occurred on November 19, 2011 in Orange County, Florida [14].

In the second letter, dated December 6, 2012, FDLE informed the University that any information derived from the criminal inquiry is protected from release and that any such release has the potential to adversely impact the investigation, and has requested that the University suspend any ongoing disciplinary or administrative reviews, pending conclusion of the criminal investigation [15]. On December 13, 2012, the FAMU Board of Trustees' received a third letter from FDLE stating that information developed during the course of the criminal investigation, along with information obtained from other sources, has identified potential violations of criminal law relating to fraud and/or misconduct by employees of and/or persons associated with FAMU [16]. The University continues to comply with all requests by FDLE in a thorough, complete and expeditious manner.

The FDLE investigation is still ongoing and no specific end date has been determined at this time. Based on the request from FDLE, the University is not in the process of conducting any administrative reviews related to financial fraud. The FDLE has not provided the University with any preliminary reports of its findings; therefore, no actions have been taken relative to the results of the investigation. Once the investigation concludes, the University will take all appropriate actions necessary to strengthen its processes and procedures if warranted.

As a result of the December 13, 2011 letter from the FDLE indicating potential financial fraud, the University is in the process of reviewing the ASAP initiative, financial procedures, financial forms and policies related to financial management and oversight. The University will continue to take proactive approaches to strengthen processes and procedures to ensure the proper control and management of University finances.

In January 2012, the Board of Governors (BOG) began its investigation of the University's "... anti-hazing program ..." [17]. Currently, the University is fully
cooperating with the BOG investigation. The BOG has not provided the University with any preliminary reports of its findings; therefore, no actions have been taken relative to the results of the investigation. Once the investigation concludes, the University will take all appropriate actions necessary to strengthen its processes and procedures if warranted.

Internal Auditor Function

As a result of a whistle-blower allegation, which indicated that the Division of Audit and Compliance (A&C) did not follow professional standards governing performance of internal auditing services, the University contracted with the firm of Sniffen & Spellman, PA to conduct a review of internal auditor processes. In addition, the Vice President for Audit and Compliance resigned in November 2011 and one other employee in the division was terminated.

In June 2012, the University hired a permanent Vice President for Audit and Compliance who has 22 years of audit experience as an auditor in higher education audits, including three years as supervisor in the Office of the Auditor General performing financial, operational, and federal awards audits of public colleges and universities [18].

Sniffen & Spellman conducted an investigation and issued a report dated November 9, 2011 [19]. The investigation concluded the following:

- The Division of Audit and Compliance (A&C) knowingly presented 15 audit or review reports to the Board of Trustees (BOT) audit committee in the form of “executive summaries,” when, at the time the reports were submitted, no final report had been prepared, thus leading recipients to believe that all work had been conducted and completed when, in fact, it had not.
- Thirteen of the fifteen reports were also submitted to the Board of Governors (BOG) in the form of “executive summaries.”
- A&C failed to affirmatively report to University management and/or the BOT that it did not have a mandatory quality assurance and improvement plan in place as
required by Institute of Internal Auditors (IIA) Standards and its own Charter and internal operating procedures. Thus, it could not represent to University management or the BOT that its reports were prepared in accordance with IIA standards.

- A&C knowingly misrepresented to the BOT audit committee in its 2010-2011 audit plan that its audits would be conducted in accordance with IIA Standards when it knew it could not make such representations.
- A&C failed to conduct audits and reviews in accordance with IIA standards.
- A&C failed to appropriately identify, analyze, evaluate and document sufficient information relative to the audits and reviews it conducted, contrary to IIA standards.
- A&C failed to conduct audits and reviews in accordance with its Charter and its own operating procedures manual.
- A&C knowingly misrepresented to the BOT Audit Committee in its 2011/12 Audit Plan that a proper risk assessment had been undertaken by A&C when it had not.
- Of the 15 audit or review reports submitted to the BOT audit committee, 12 either had substantive work performed after the date of submission or did not exhibit sufficient work to support the reported conclusions.

Sniffen & Spellman, PA did not investigate the allegation that the Division of Audit and Compliance failed to conduct investigations objectively due to time constraints and budgetary restrictions. To ensure that all issues related to the whistle blower allegations were reviewed, the University contracted with Accretive Solutions, a professional firm specializing in enterprise risk management, to perform the assessment to address and correct the above-noted deficiencies [20]. The following assessments were performed:

- A university-wide risk assessment to identify key high risk areas within the University, and
- A gap analysis to identify which of A&C policies and procedures were not meeting audit standards.
The Division of Audit and Compliance has used the risk assessment performed by Accretive Solutions in establishing the audit topics and objectives included in the 2012-2013 Audit Work Plan [21]. The audit plan was reviewed and approved by the Audit Committee and Board of Trustees at its June 2012 meeting.

As described previously, the Sniffen & Spellman investigation identified 15 audits/reviews conducted by A&C that did not meet audit standards. The Division evaluated all 15 audits/reviews to determine the benefit of re-performing the work. Our evaluation disclosed that seven would not be re-performed based on the following:

- The reported findings and conclusions for five audits/reviews were substantiated in the work papers prepared by A&C, although the documented work was deficient in a way that did not affect the conclusion as reported by A&C, and
- Two of the topics have been recently reviewed without findings, or are under review by other investigative agencies and the State of Florida Auditor General Office as part of the 2012 Operational Audit for the year ending June 2012. This review has not been finalized by either agency.

The University retained Ernst & Young, an outside independent firm, to re-perform the work for the remaining eight audits [22]. The BOT engaged Ernst & Young to investigate whether the investigations conducted by A&C were done objectively, whether applicable professional standards were adhered to, and whether sufficient documentation was developed to support findings and conclusions. The work is in progress and a report is expected to be released within the next 90 days.

In addition to the two above assessments and reviews, the FAMU Division of Audit and Compliance performed a comprehensive self-assessment of the University Board of Trustees operating procedures that focused upon the processes by which the Audit Committee provides oversight of the University's Division of Audit and Compliance (A&C). The self-assessment activity resulted in the following:
Audit charters for both A&C and the BOT Audit Committee were revised in April and June 2012 to align the charters with the model charters of the Institute of Internal Auditors [23] [24],

In May 2012, a report on Audit Committee practices and trends prepared by an international accounting firm was provided to BOT Committee members for information and review [25], and

Training related to its responsibilities will be provided to the BOT Audit Committee beginning in the Fall 2012.

Based upon the gaps identified and corrective actions recommended by Accretive Solutions in the gap analysis, A&C is developing a quality assurance and improvement program that covers all aspects of the internal audit activity, which is expected to be in place by December 2012. The following steps are being taken to establish a quality assurance and improvement program:

- An operating policies and procedures manual was prepared and is in use as of May 2012 [26],
- Checklists and standard work paper formats are being developed,
- Training is being provided on an ongoing basis [27],
- A review process was established in February 2012 and all work is reviewed by someone other than the one doing the work, and
- An internal assessment process has been established to include:
  - Ongoing monitoring of the internal audit activity, and
  - Periodic reviews are to be performed through self-assessment or by others with sufficient knowledge of internal audit practices beginning January 2013. This time frame is necessary to give enough time for work to be performed under the new policies and procedures prior to review.

As required by IIA Standards, an external assessment of A&C internal audit activity is to be performed by December 2013. This time frame is necessary to give sufficient time for corrective actions to be implemented and work to be performed under the new policies and procedures before the external assessment is performed. Although audit standards require the external assessment to be done every five years, the Audit Committee decided to perform the external assessment every three years to provide
closer oversight of A&C operations. In June 2012, a report on the status of the actions taken by A&C to correct the deficiencies disclosed in the Sniffen & Spellman report was given the Board of Governors Audit Committee [28] [29]. By implementing the corrective action plan, the University continues to improve its processes and procedures to provide assurance that the internal audit activities operate in an appropriate manner.
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<tr>
<td>2. FAMU Board of Trustees Website <a href="http://www.famu.edu/index.cfm?a=BOT">http://www.famu.edu/index.cfm?a=BOT</a></td>
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<td>5. FAMU Audit Plan 2011-12</td>
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<td>7. Transformation Through Technology Enhancement (T3E) Project Plan</td>
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<td>8. ASAP Organizational Chart</td>
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<td>9. Division of Administrative and Financial Affairs Organizational Chart</td>
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<td>11. Resume of Vice President of Administrative and Financial Services</td>
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<td>12. Resume of University Controller</td>
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<td>13. Audit and Compliance Organizational Chart</td>
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<td>14. Letter from the Florida Department of Law Enforcement (FDLE) dated December 2, 2011</td>
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<td>15. Letter from the Florida Department of Law Enforcement (FDLE) dated December 6, 2011</td>
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<td>17. Board of Governors Letter indicating investigation</td>
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<td>18. Resume of Vice President of Audit and Compliance</td>
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<td>19. Sniffen and Spellman Report</td>
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<td>20. Accretive Solutions Report</td>
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<td>21. 2012-13 Audit Work Plan</td>
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<td>22. Remaining eight (8) audits</td>
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<td>23. Audit Charter for BOT Audit Committee</td>
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Florida A&M University

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CS 3.11.2 – Institutional Environment

Narrative

Date of Submission: July 25, 2012
Response to SACSCOC June 25, 2012 Letter

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CS 3.11.2 – Institutional Environment

The institution takes reasonable steps to provide a healthy, safe and secure environment for all members of the campus community.

Specific SACSCOC Concern:

Provide policies in place to protect student safety when participating in University-sanctioned activities. Additionally, provide details on changes instituted or contemplated as a result of the recent hazing-related tragedy (clarify whether implemented or planned).

Florida A&M University takes reasonable steps to provide a healthy, safe and secure environment for all members of the campus community. Therefore, the University is in compliance with Comprehensive Standard 3.11.2. However, additional measures have been instituted to strengthen and continuously improve the University’s policies and procedures for providing a healthy, safe and secure environment for all members of the campus community.

There are many units on campus that have policies and procedures in place to ensure an atmosphere that allows the campus community to achieve its educational and professional goals in a healthy and safe environment. Two institutional units responsible for ensuring the safety, security and health of the campus community are the Department of Environmental Health and Safety (EH&S) and the Department of Public Safety (DPS). The mission of the Department of Environmental Health and Safety is to administer numerous programs to provide a healthy, safe campus environment for work and study, and to establish and maintain compliance with federal, state, and local environmental laws, rules and regulations [1]. The mission of the Department of Public Safety is to provide quality service to the campus community by promoting a safe and secure environment through police, students and staff interaction, with emphasis on integrity, fairness and professionalism [2].

Environmental Health and Safety accomplishes its mission by administering various safety-related programs, including but not limited to fire safety, laboratory safety, hazardous waste management, radiation and laser safety, building code compliance, risk/insurance management, and occupational safety/accident prevention [3]. These
various programs are administered utilizing inspections, training, safety manuals, guideline documents, safety concern investigations, and oversight of corrective actions as appropriate to maintain and enhance the effectiveness of each program. EH&S develops numerous safety manuals and guidelines to help ensure regulatory compliance and safe practices across campus [3]. These manuals and guidelines follow all Occupational Safety and Health Administration (OSHA) and Environmental Protection Agency standards and guidelines. EH&S also provides support to other University programs through committee membership and responsibility in the areas of emergency management, animal use in research, bio-safety, and radiation safety. In pursuit of achieving the departmental mission, EH&S has also developed numerous internal operating memoranda for program activities to ensure that consistent and comprehensive procedures are followed.

The University's administration makes every effort not only to maintain a secure, safe, and healthy environment, but also to improve it. In addition to the activities administered by EH&S, the Department of Public Safety (DPS) is tasked with promoting a safe and secure campus environment. DPS presents comprehensive and specific information related to University safety in its Annual Campus Security Report [4]. This report identifies public safety policies and procedures, describes public safety programs and services available, and reports the on-campus occurrence of criminal incidents and arrests. The DPS conducted Safety Surveys in 2003, 2008 and 2012. As a result of the findings from the 2003 Safety Survey, in which 28% of participants felt not very safe at night, immediate measures were taken to address the responses [5]. These measures included the addition of emergency notification technologies, the Federal Siren Warning System, along with the E2Campus text messaging and email alert system; enhanced lighting around campus; periodic safety talks by campus security personnel as a means of sharing information on safety and crime prevention strategies to help deter crime or keep others from becoming victims of crime; the development of a program to escort students and staff during night-time hours, and the development of another program to allow students, faculty and staff to request an officer be made available when leaving the campus at night [6].
FAMU was the first school in the State University System to install and utilize an Emergency Warning System. This system includes instituting an E2Campus Emergency Notification System and an emergency warning siren. The E2Campus system is a self-service, web-based, mass notification system that empowers the department to send instant alerts to all students, faculty and staffs cell phone, email and web page automatically all at once from a single interface. The emergency warning siren is a mounted system that gives immediate real-time warnings. The system delivers audible siren and voice warnings from two strategic locations on campus. It is activated to warn students, staff and visitors of an immediate and/or imminent threat to the University campus, whether natural or man-made. This system is used in conjunction with the e2Campus system, the natural threat advisory system, and the emergency telephone blue lights for complete coverage.

DPS includes a variety of law enforcement operations: satellite patrol operations at the FAMU’s College of Law in Orlando; parking services operations; traffic enforcement; towing and immobilization operations; emergency telephone blue lights and closed circuit television cameras; crime prevention services/educational programs; operation identification, which is a program in which property is engraved with the owner’s identification marking for detection purposes at no cost; and operation S.A.F.E. (Students Available For Escort) team, which is available for students and staff during night-time hours. The Annual Campus Report [4] prepared and released by FAMU Department of Public Safety, complies with the Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act.

Department of Public Safety (DPS) offers programs that are aimed at enlisting support and cooperation for the entire campus community in crime prevention efforts. These programs and subjects include the following: operation identification; operation book stamp; rape aggression defense (RAD) training; self defense awareness and familiarization; college crime watch; new student orientation; campaign to eliminate
drunk driving; officer friendly; campus lighting assessment; residence hall safety talks; and crime prevention workshops and seminars.

University-sanctioned Activities
The protection of student safety specific to University-sanctioned activities is outlined in the following Special Events policy and procedures. It shall be the policy of the Florida A&M University Department of Public Safety (FAMU DPS) to plan and coordinate the activities related to special operations in order to provide the University community with the high standards of safety and security it has come to expect.

The corresponding procedures are as follows. Police staffing for special events will take into account several factors: time of event, type of event, estimated attendance, location on campus, etc.

➢ Command Authority. All special events shall be under the command of the appropriate Patrol Lieutenant, or designee.
➢ All requests for special events services to be provided by the department shall be directed to the Special Operations Unit Sergeant.
➢ The Special Operation Sergeant shall be responsible for planning and coordinating services for special events including, but not limited to:
  ➢ Intra departmental functions;
  ➢ Concurrent jurisdictional functions;
  ➢ Procurement, distribution, maintenance and replacement of equipment;
➢ Personnel assignments;
➢ Specific duties for special operations personnel.
➢ Prior to each special event, the Special Operations Sergeant shall submit a plan to the Patrol Lieutenant outlining:
  ➢ Traffic and crowd estimates;
  ➢ Estimated crime escalation projections;
  ➢ Logistical requirements for personnel and equipment;
  ➢ An explicitly designated chain of command for the operation;
  ➢ A contingency plan for traffic direction and control
The Patrol Lieutenant shall request and coordinate with any outside agency (LCSO, TPD, FHP, FDLE etc.) as needed to accomplish the mission. When possible, the Special Operations Sergeant shall utilize those agencies that have jurisdiction on University property, or those agencies that have entered into a mutual aid agreement with this department. Examples of resources that may be needed are:

- SWAT/Tactical
- Hostage Negotiators
- Police Dogs
- Bomb Squad
- Field Force
- Crime Scene Technicians
- The Special Operation Sergeant shall complete an after-action report following all significant special events.

As previously stated, the safety of all FAMU students, staff, and faculty is of critical importance to the institution. Therefore, the University continues to work diligently to provide and maintain a safe campus environment at all times. Examples of these efforts include, but are not limited to, conducting regular safety workshops on topics such as cyber-bullying, domestic violence, fire safety, and property safety; utilizing electronic billboards to display safety messages to the university community; the placement of defibrillators in campus buildings; the installation of security cameras in campus residence halls; the use of swipe card systems to control entrance to campus residence halls; reactivation of the FAMU S.A.F.E Team (Students Available for Escort) program by the Student Government Association; and increasing police presence at residence apartments located away from the center of campus.

**ADDITIONAL UNITS ADDRESSING HEALTH, SAFETY, AND SECURITY**

Student Health Services, University Housing, Plant Operations and Maintenance, Facilities Planning and Construction, the Victim Advocacy Program, and Office of Student Activities also play important roles in the health and safety life of the University.
Student Health Services promotes optimal health care in our student population with an emphasis on disease prevention. University Housing collaborates closely with the Counseling Center, Student Health and the Public Safety Department on security and crime prevention issues to maintain a safe, clean and healthy environment for the residence halls. The Building Services Unit within Plant Operations and Maintenance provides for clean, safe and sanitary academic and administrative buildings. The Department of Facilities Planning and Construction, working with the Public Safety Department and architects and engineers, identifies and corrects security-related problems associated with renovations and new construction. The Victim Advocacy Program in the University Counseling Center works closely with the University Public Safety Department and University Housing, offering a wide variety of preventive programs and a wide range of support services.

In accordance with Florida Statute 1006.63 [7] and FAMU Anti-Hazing Regulation 2.028 [8], FAMU has a "zero tolerance" policy regarding hazing. The institution annually holds mandatory anti-hazing workshops for all registered clubs and organizations. More specifically, the Office of Student Activities requires that all clubs and organizations, including but not limited to Campus Wide, Departmental/Academic-related, City/County/State, Military, Performing Arts, Cultural, Political, Religious, Recreational, and Volunteer Service must complete an Anti-Hazing Workshop in order to be recognized as an organization at Florida A&M University, excluding the Marching Band and other music ensembles. During these workshops, students are apprised of University rules and regulations regarding hazing by a representative from the University General Counsel's Office, the Chief of Police (or his designee), and the Director of Student Activities [9]. The Marching Band's Anti-Hazing Workshops are conducted by the Band faculty in which band members are apprised of University rules and regulations regarding hazing by a representative from the University General Counsel's Office, the Chief of Police (or his designee), and the Director of Student Activities and/or Vice President of Student Affairs [10]. In both cases, workshop participants also receive an "anti-hazing" statement, and they are strongly encouraged to report any incidents of hazing to the proper authorities. All reported incidents of
hazing are referred to the FAMU Department of Public Safety, which fully investigates each case following established crime reporting procedures.

Additionally, all student clubs and organizations must include in their Constitution and By-Laws the current Anti-Hazing Regulation [11]. Lastly, all members of any club or organization must sign the Anti-Hazing Agreement [12].

Changes as a Result of The November 2011 Hazing Incident

During the initial weeks following the hazing tragedy, the institution sponsored several activities to heighten campus awareness about the associated dangers of hazing. The Student Government Association held a mandatory anti-hazing forum for students on December 5, 2011. The President held a President’s Forum for faculty and staff on December 5, 2011, and the Board of Trustees held an anti-hazing workshop on December 7, 2011. Students who desired to report safety concerns, including hazing related incidents, were reminded that they should immediately contact the FAMU Office of Public Safety. The institution has also provided additional grief counseling on campus for students, faculty and staff.

After the initial weeks, many other initiatives followed. The major actions taken are listed below.

1. Suspended the Marching Band activities indefinitely; later through the 2012-13 academic year
2. Issued a Notice of Intent to Terminate the Director of Bands/Department of Music Chair; later placed on Administrative Leave based on letter from FDLE pending its criminal investigation [13]
3. Disciplinary actions taken against two Department of Music professors due to inappropriate behavior related to hazing
4. Appointed Interim Department of Music Chair
5. Established External Task Force – Postponed due to the BOT changing the Task Force’s status to not operate under the Florida Sunshine Law
6. Provided additional grief counselors to students dealing with the loss of student band member
7. Created an Internal Crisis Management Team
8. Developed a webpage to provide information about the Band Hazing incident to our supporters locally and outside of Florida (http://www.famu.edu/index.cfm?OfficeOfCommunications&FAMUBandUpdate)
9. Communicated with and provided documentation to the Southern Association on Colleges and Schools (SACSCOC) regarding compliance with relevant accreditation standards on student safety
10. Directed all allegations and criminal activity to be immediately brought to the President's attention
11. Enhanced staffing to ensure that media and public information requests are handled timely and with consistent and accurate messaging
12. Researched best practices and actions taken by other colleges and universities to address the culture of hazing
13. Established Internal Anti-Hazing Research Initiative
14. Reached out to and participated in local and national anti-hazing initiatives
15. Suspended Spring 2012 Intake and New Membership activities for student clubs and organizations, except those reviewed and approved for exemption
16. Canceled the 2012 Summer Band Camp
17. Held Campus-wide Safety Forum
18. Identified staffing and organizational needs in the Division of Student Affairs to address hazing related issues for more effective management of student organizations
19. Revised BOT Anti-Hazing Policy
20. Held Anti-Hazing Workshop for BOT
21. Developed criteria for future band membership/participation
22. Participated fully in the on-going FDLE and BOG investigations
23. Created Anti-Hazing Committee
24. Generated immediate electronic posting of the Anti-Hazing Agreement for all students to complete when signing on to iRattler student administration system to register for classes.

In May 2012, the University Chief of Police retired. The University is in the process of conducting a search to fill the position. The Acting Chief of Police is highly qualified and has over 25 years of experience in law enforcement [14]. DPS works cooperatively with local law enforcement to prevent and resolve criminal activity. DPS has taken the following actions below:

➢ Conducted on-going internal investigations not related to FDLE and BOG investigations,
➢ Participated fully with external investigations, and
➢ Revised administrative processes to allow prompt actions taken against alleged perpetrators and protection of victims by sending immediate notification to Judicial Affairs for swift and appropriate action to be taken.

The Anti-Hazing Plan [15], which was presented to the FAMU Board of Trustees June 6, 2012, outlines specific actions and strategies to prevent hazing in the future [16]. As delineated above, the Music Department is under new leadership, and the requirements for participation in the Marching Band and other ensembles associated with the Department have been significantly altered before the band is reconstituted [15].

Two items of particular note in the Anti-Hazing Plan are the creation of two positions: Special Assistant to the President for Anti-Hazing and the Music Department Compliance Officer [15]. The Special Assistant to the President for Anti-Hazing shall report to the President of Florida A&M University. The Provost and Vice-President for Academic Affairs shall serve as the secondary supervisor for this position. The Special Assistant shall be responsible for the overall management of the university-wide anti-hazing initiatives in collaboration with the University student judicial system pursuant to the provisions of the Student Code of Conduct [17] and Due Process Regulations [18].
The Music Department Compliance Officer shall report to the Special Assistant to the President for Anti-Hazing. The Compliance Officer shall be responsible for ensuring the overall compliance of the Music department, specifically bands and ensembles with University policies and procedures and Music Department guidelines specified in approved handbooks. The Compliance Officer's scope of work shall include, but not be limited to, monitoring compliance with the provisions of the Student Code of Conduct [17] and Due Process Regulations [18] to include anti-hazing and University imposed sanctions; academic eligibility requirements; meetings and practice limitations; travel; designation and collection of fees; and training and certification of faculty, staff and students. The Compliance Officer shall also monitor individuals and organizations under sanction by the University and/or national organizations.

The Anti-Hazing Plan [15] also establishes new eligibility criteria to participate in the band and enhanced procedures pertaining to intake activities for all university-sanctioned organizations that perform intake. All membership and intake activities shall be conducted under the supervision of certified advisors and must occur on campus during normal hours of operation on the dates and times specified by the Division of Student Affairs. Is this possible? Additional information on specific planned changes to increase safety and prevent hazing is contained in the Anti-Hazing Plan [15].

Florida A&M University is fully committed to providing a healthy, safe, and secure environment for all members of the campus community. The University will continue to work diligently to raise awareness about the hazards of hazing on both the local and national levels, while maintaining its ongoing continuous improvements efforts to enhance the University's healthy, safe, and secure campus environment for the entire campus community.
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<td>Selective Sample of Marching Band Anti-Hazing Workshop Agenda</td>
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<td>Copy of Anti-Hazing Agreement</td>
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<td>13</td>
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<td>14</td>
<td>Resume of Acting Police Chief</td>
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<td>15</td>
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<td>16</td>
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<tr>
<td>17</td>
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