Audit and Compliance Committee Meeting
Thursday, October 11, 2023
3:30 9.m.

Committee Members: Craig Reed, Chair
Jamal A. Brown, Kelvin Lawson, Belvin Perry, Michael White

AGENDA

I. Call to Order

II. Roll Call

ACTION ITEMS

III. Minutes: Consideration of Approval – June 8, 2023

IV. Risk Appetite Statement

V. Division of Audit Workplan Updates

VI. University Equity Report

VII. Office of Compliance and Ethics Annual Report

INFORMATIONAL ITEMS

VIII. Audit and Compliance Committee Action Plan

Office of Compliance and Ethics:
IX. Office of Compliance and Ethics Update

Division of Audit:
X. Audit and Investigative Follow-up
XI. External Audit Updates
XII. ERM Updates
XIII. Division of Audit Update
XIV. Adjournment
Committee Minutes

Members Present: Trustee Craig Reed (Chair), Trustee Ann Marie Cavazos, Trustee Michael Dubose, and Trustee Belvin Perry

Chair Craig Reed called the meeting to order. Ms. Debra Barrington called the roll. A quorum was established. Chair Reed acknowledged three (3) Action Items:
- Minutes: Consideration of Approval – Thursday, February 16, 2023;
- Division of Audit Annual Work Plan; and
- University Code of Conduct University Regulation 1.019.

The first action item – Chair Reed acknowledged consideration of the Thursday, February 16, 2023, Audit and Compliance Committee Meeting Minutes. The minutes were moved by Trustee Belvin Perry, Jr., and seconded by Trustee Dubose. The motion carried and the February 16, 2023, minutes were approved.

The second action item – Chair Reed recognized VP Joseph Maleszewski to discuss the “Draft” Division of Audit FY2023-2024 Work Plan for the Committee’s and BOT consideration for approval. VP Maleszewski presented the audit portion of the Work Plan which included:
- Two BOT-required projects related to FAMU Athletics for Fall 2023 and Spring 2024;
- Three BOG-required projects on Performance-based Funding Data Integrity, Foreign Influence, and Post-Tenure Review;
- Two operational audits related to Property Management, and Campus Safety and Security;
- Four advisory service projects for colleges and schools related to their contributions to Performance Based Funding, National Rankings, Strategic Plan, and Operations;
- Two IT/Cybersecurity engagements related to the Cybersecurity Maturity Model Certification Level 1 Self-Assessment, and Gramm-Leach Billey Act;
- Continued service on various committees including the Athletic Action Plan Implementation Team and Workgroup, Metrics and Rankings Workgroup, and Civil Discourse Committee;
• Training and Awareness activities including Fraud Awareness Week, Internal Audit Awareness Month, FAMU Fundamentals, and the FAMU Management Seminar; and

• Division of Audit services including External Audit Coordination, Investigative Services, Management Requests, and Audit, Advisory, & Investigative Follow-up.

VP Maleszewski acknowledged CRO Melton to present the Enterprise Risk Management portion of the Work Plan. CRO Melton discussed planned work being predicated upon requested positions and may have to be readdressed if positions are not allocated as requested. She reviewed planned work related to the ERM program’s purpose and scope including ERM Policy Review, Risk Appetite Statement Review, Strategic Plan Risk Assessment, and Risk-Based Budget Tools. She then covered the Enterprise Risk Management Advisory Committee and their focus on Strategic and Performance risk as well as focus on operational risk. She reviewed how the ERM Process will focus on conducting Risk Workshops, Risk and Controls Certification Program, University Risk Assessment, Risk Mitigation, Risk Alerts – Emerging Risks, and Risk Bulletins.

CRO Melton reviewed how the ERM program will influence the Campus Risk Management Culture through ERM Awareness Week, ERM On-Demand Training Courses, Risk Champion Program, ERM Newsletter, and Infographics, and Risk Culture Survey. Finally, she reviewed Special Projects planned for the coming year including a Crisis Management Toolkit, Cybersecurity Toolkit, Athletic Risk Toolkit, Artificial Intelligence Risk Toolkit, and ERM Standard Operating Procedures.

CRO Melton took questions. Chair Reed recognized Trustee Harper who discussed intellectual property and related risks. Chair Reed then called for a motion to approve. Trustee Dubose made a motion which was seconded by Trustee Belvin Perry, Jr. The motion carried.

The third action item – Chair Reed recognized Chief Compliance Officer Rica Calhoun to present University Regulation 1.019 University Code of Conduct.

Ms. Calhoun indicted that recent legislation changes prompted updates to the FAMU University Code of Conduct. Changes included additional language that aligns with university expectations and provides clarifying terms. Material changes included updates related to freedom of expression and civil discourse. Chair Reed requested a motion. Trustee Belvin Perry, Jr., moved approval. Trustee Dubose seconded the motion which carried.

Chair Reed acknowledged Chief Compliance Officer Calhoun to address informational items.

Informational Items:

Ms. Rica Calhoun shared Office of Compliance and Ethics (OCE) Updates. She began with a summary of this year’s FAMU Fundamentals which included the following sessions and completion rates:
• Clery: 1704 / 84%
• Compliance and Ethics: 1789 / 88%
• Enterprise Risk Management: 1774 / 87%
• Public Records: 1774 / 87%
• Cyber Security: 1778 / 87%
• Emergency Management: 1779 / 87%
• Sexual Harassment Prevention...: 1808 / 89%

Ms. Calhoun highlighted that we saw an increase in raw numbers and percentages over last year and are inching toward about 90% across most modules.

Ms. Calhoun next reviewed investigative activates – noting that since July 1, the hotline has logged 57 reports. Open investigations in OCE include allegations of impermissible conflicts of interest, retaliation, and employee misconduct. Across investigative offices, 24 complaints have been closed and 33 are in process.

Ms. Calhoun than addressed OCE Key Initiatives monitoring in different functional areas. These issues included Faculty Misconduct/ Retaliation, Health and Safety, Public Records, Foreign Influence and Conflicts of Interest.

She then highlighted the inaugural edition (May 2023) of the OCE quarterly newsletter entitled Compliance Chronicles.

Ms. Calhoun introduced Miranda Levy in her new role as Coordinator in the OCE. She then discussed how the OCE continues to represent the University locally and nationally – highlighting the following items:

- **Tallahassee Independent Ethics Board:** Dr. Robinson recently nominated Rica Calhoun to serve as a board member of the Tallahassee Independent Ethics Board. The Board consists of seven members, of which, five are individually selected by the City Commission, Public Defender Office, State Attorney, President of Florida A & M University, and the President of Florida State University.
- **Florida Law Enforcement Accreditation Assessor:** La’Tonya Baker, Compliance Program Manager, recently achieved the credential of Certified Assessor. This certification assists her in enforcing the highest uniform standards for investigative units. Her experience assists the Office of Compliance and Ethics enhance effectiveness and compliance with best practices in investigations.
- **FBI Compliance Academy:** La’Tonya Baker was also one of only 50 individuals selected out of 300 applicants across the country to attend the May 2023 FBI Corporate Compliance Professional Outreach event in Washington, DC at the FBI Headquarters. This was a unique opportunity to observe FBI operations and learn more about their compliance efforts to share with FAMU.
- **Forum on Conflicts of Interest (FOCI) Mentorship:** Compliance Program Manager, Edna Gasque, has recently been selected to be a Mentee in the FOCI Mentorship Program. The FOCI Mentorship Program serves to connect mentors
with a group of mentees to support their career journey, to help them build their peer network, as well as access resources through their engagement with FOCI.

Ms. Calhoun then highlighted the following items:

- OCE served on the student code of conduct committee and contributed to the latest review.
- Rica Calhoun and La'Tonya Baker supported and facilitated a Civil Discourse discussion through engagement with the SGA Senate.
- OCE partnered with FAMU Athletics to host the NCAA visit April 25-26, 2023.
- Rica Calhoun presented at the University’s New Employee Orientation.
- OCE presented on Civil Discourse and Investigations at the 2023 FAMU Management Seminar.
- Rica Calhoun presented "Ethics in Higher Education" to the Association of College and University Auditors (ACUA) on May 25, to more than 900 registrants.

Ms. Calhoun reviewed the revised organizational structure for the Office of Compliance and Ethics and discussed “What’s Next?” She discussed efforts to implement the External Review recommendations including focus on increased resources to achieve additional efficiencies in program goals and enhanced monitoring of compliance risk. She then discussed FAMU Fundamentals after action efforts which include working with managers and compliance partners to increase training completion, post-training survey, and implement enhancement ideas. Finally, she covered OCE restructuring including working on the integration of Equal Opportunity Programs and Athletics Compliance into the Office of Compliance and Ethics, including alignment of reporting lines and responsibilities.

Chair Reed complemented Ms. Calhoun and her team on the evolution of the compliance and ethics function.

Chair Reed then acknowledged VP Maleszewski and AVP Melton to present the following information items:

- Risk Assessment;
- I/C Assessment – President Robinson’s I/C Assurance Statement;
- Audit and Investigative Follow-up;
- External Audit Updates;
- ERM Updates; and
- Division of Audit Update.

First, AVP Melton presented the FAMU TOP 10 Risks for FY 2023-2024 where were identified as 1) Campus Safety and Security, 2) Talent Management, 3) IT/Cybersecurity, 4) Staff and Student Mental Health, 5) Organizational Change Management, 6) Emergency Preparedness, 7) Culture of Accountability, 8) Privacy and Data Governance, 9) Legislation Impacts from Florida’s 2023 Session, and 10) Athletics.

VP Maleszewski then provided an overview of the President’s annual Internal Controls Assurance Statement. He noted that this is the third year in a row that DoA assisted President Robinson in his assessment of the University’s Internal Control Structure,
which is required by the Board of Trustees, Policy, and University Policies adopted in December 2019.

VP Maleszewski emphasized that BOT and University policies require that the President and the President's Administration are responsible for establishing, and consistently maintaining a system of internal controls which:

- Prevent and detect fraud, waste, and abuse as defined in Section 11.45(1), Florida Statutes;
- Promote and encourage compliance with applicable laws, rules, regulations, contracts, grant agreements, and best practices;
- Support economical and efficient operations;
- Ensure reliability of financial records and reports; and
- Safeguard University assets.

VP Maleszewski also shared that these policies require President Robinson to evaluate the system of internal controls annually, identifying any areas of weakness and opportunities for improvement.

The process requires that President Robinson report his assessment of internal controls on a five (5) point scale for each of the five components of control. For this year, three (3) of the five (5) components of controls were strengthened - Control Environment went from a four (4) to a 4.2; Risk Assessment went from a 3.75 to a 4.0; and Information and Communication went from four (4) to 4.33.

Mr. Maleszewski indicated that the opportunity for the university to enhance internal controls lies in the Control Activity component of the framework, where it has been at a 3.67 for the three (3) years of this assessment. Control Activities are tied closely to the concept of risk management. Management controls are implemented to ensure that business processes are performed appropriately, meet the business objective, and do not subject us to any unnecessary risk. The President's assessment this year identifies areas of strength and opportunities for improvement. Areas of strength included organizational restructuring, enhanced new employee orientation, Athletics Action Plan, policy, Enterprise Risk Management, and training and awareness. Identified opportunities for improvement included talent management, culture of accountability, risk mitigation, entity-wide assessment of business processes, customer service initiatives, and enhance communication channels. The President's overall assessment is that internal controls at the university continue to be strong. With continued effort in the areas of highlighted strength it is believed that we will continue to mature our internal controls.

VP Maleszewski proceeded to report the 2022-2023 internal audit activities. He indicated that the 22-23 Performance-Based Funding Data Integrity Audit was completed; the Security Plan Audit (Confidential) is complete and in follow-up; the Driver and Vehicle Information Database (DAVID) audit is in the reporting phase; and the Financial Aid audit is in “Fieldwork.” He indicated that there were five (5) closed audit issues and 11 open audit issues currently being monitored.

VP Maleszewski then summarized the 2022-2023 External Audit Activities. These included three complete projects - DSO Internal Controls Review (Crowe), State Financial Aid-Bright Futures (AG), and Financial Statement Audit (FYE 2022). Two projects are in the planning phase - Athletics Financial Statement Audit (FYE 2022-
2023), and Athletics Agreed Upon Procedures (FYE 2022-2023). The Athletics Action Plan Review (Thomas Howell Ferguson) is in the follow-up phase and the Auditor General is currently in the process of initiating their Financial Statement Audit for FY2022-2023. VP Maleszewski summarized that there are currently four (4) open audit issues and 14 closed audit issues.

VP Maleszewski then provided a brief summary of the 2022-2023 Division of Audit Investigations. He indicated that there are 27 items for the year, with 12 investigations in progress, six (6) referred, and eight (8) closed. He summarized that the type of issues are in the areas of Accounting and Auditing (7), Discrimination or Harassment (1), Employee Misconduct (2), Falsification or Destruction of Business Records (1), Fraud (5), General Concern (8), Legal or Regulatory Violation (1), and Other (2).

VP Maleszewski then summarized the FY 2022-2023 Division of Audit Advisory Services. The projects in the follow-up phase are the Title IX (Control Self-Assessment), Office of Procurement Services, and Remote Work IT Controls. Two projects are in the reporting phase – they are Student and Faculty Experience for both the College of Agricultural and Food Sciences (CAFS) and the College of Pharmacy and Pharmaceutical Sciences Institute of Public Health (CoPPHS/IPH). Two projects are in fieldwork phase – they are Academic Affairs: Student and Faculty Experience, and Controller’s Office (Control Self-Assessment).

AVP Deidre Melton provided key Enterprise Risk Management (ERM) updates. She highlighted the role of the Enterprise Risk Management Advisory Committee (ERMAC); the development of new ERM tools; IT/Cybersecurity Risk Bulletin; Pregnant/Nursing Employee Risk Alert; Bomb Threat Planning Team; and participation in the FAMU Fundamentals training.

AVP Melton then provided Division of Audit office updates related to training, staff, professional development, and new team members.

Chair Reed adjourned the Audit and Compliance Committee Meeting since there was no further business to be discussed.
Risk Appetite Statement

October 11, 2023
Executive Summary

Florida A&M University (FAMU) is an 1890 land-grant institution dedicated to advancing knowledge, resolving complex issues, and empowering citizens and communities. FAMU is a public, historically Black university located in Tallahassee, Florida, enrolling nearly 10,000 students from across the United States and more than 70 countries worldwide. In an ever-evolving landscape of challenges and opportunities, our university recognizes the critical importance of a well-defined Risk Appetite Statement. This document serves as the bedrock of our risk management framework, guiding our institution towards its strategic goals while ensuring prudent risk-taking and safeguarding our stakeholders' interests.

The Risk Appetite Statement, as a foundational component of our risk management strategy, plays a pivotal role in achieving several key objectives:

1. **Clarity in Decision-Making**: It provides a clear framework for assessing and managing risk, ensuring that decisions across all university functions align with our overall risk tolerance.

2. **Enhanced Accountability**: By clearly outlining roles and responsibilities for risk, the statement establishes accountability at all levels of our organization, promoting a culture of risk awareness and ownership.

Our Risk Appetite Statement delineates roles and responsibilities across the university. Leadership is tasked with setting the tone by articulating the institution's risk appetite. Managers, faculty, and staff are empowered to assess and manage risk within their respective areas, fostering a collaborative approach to risk management that spans the entire organization.

Leadership has diligently defined risk appetite in alignment with our core operational areas and strategic plan themes and enablers. This articulation of risk thresholds enables us to:

1. **Optimize Strategic Planning**: By identifying acceptable levels of risk in key strategic areas, we strike a balance between innovation and stability, guiding the development and execution of our strategic plan with greater precision.

2. **Operational Excellence**: In core operational areas, our risk appetite statement ensures that we proactively manage risk to maintain operational excellence, protect our resources, and deliver on our commitments.

3. **Safeguarding Our Mission**: By setting clear boundaries for risk-taking, we safeguard our university's mission, ensuring that it remains resilient and sustainable even in the face of uncertainty.

In conclusion, FAMU’s Risk Appetite Statement is a blueprint for achieving our strategic goals, an instrument for accountability, and a reflection of our commitment to responsible risk management. It underscores our unwavering dedication to the welfare of our institution and the community it serves.
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Introduction

What is Risk Appetite?
Risk appetite applies to the management of existing activities, as well as the University seeking out new opportunities. The Board of Trustees, management, faculty and staff members are responsible to continually review what the University does, to investigate new opportunities, and to take account of individual risks in decision-making.

The Risk Appetite Statement summarizes the University’s tolerance for risk in each of a whole range of activities undertaken. For example, the University’s tolerance for risk of significant breaches of the FAMU Code of Conduct is low. Therefore, a RISK AVERSE appetite has been identified regarding intentional and material breaches of FAMU Values and Code of Conduct. On the other hand, tolerance for risk in attracting additional revenue streams and resources for priority areas is classified as OPPORTUNITY SEEKING. All of the activities undertaken by the University can be classified in terms of risk appetite. The statement sets out the most significant types of risks to strategic and performance goals that the University is exposed to and outlines the level of risk the University is willing to accept for each risk category.

Objectives of Risk Appetite
The Risk Appetite Statement is a written articulation of the University’s risk appetite to guide management and staff members in their daily roles. It serves to:

- Define the risk profile of the University;
- Establish a consistent view of the risk parameters the University operates in;
- Establish boundaries for risk categories to determine whether further risk responses are required or where the University is willing to take on risk in efforts to achieve certain goals and objectives; and
- Guide decision-making, particularly with respect to the extent to which resources are required to be allocated in response to the level of risk which is considered ‘acceptable and justifiable’. In this regard the Risk Appetite Statement is intended to operate as a trigger for decision making, escalation and reporting.

When reading a Risk Appetite Statement, it is important to note:

- It is not a substitute for, but an adjunct to FAMU’s risk management framework and is intended to be consistent with the organizations overarching approach to risk management;
- Is intentionally broad to apply across the University while remaining relevant in changing business conditions;
- Focuses on risk that needs to be taken to pursue strategies that enhance long-term success;
- Recognizes that risk is more than individual decisions;
- The Risk Appetite Statement is dynamic and will be reviewed on annually in conjunction with the University’s strategic planning cycle.
Risk Appetite at Florida A&M University

Risk Appetite Roles and Responsibilities
Risk management is integral to all aspects of Florida A&M University’s activities and is the responsibility of all University leadership, faculty, and staff members. The following table refers to the individual roles and responsibilities with regards to risk appetite and risk management:

<table>
<thead>
<tr>
<th>BOARD OF TRUSTEES</th>
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<tbody>
<tr>
<td>• Collaborate and actively engage with management in discussions of risks, especially regarding philosophy, interaction and aggregation of risks, and underlying assumptions.</td>
</tr>
<tr>
<td>• Provide oversight to ensure that management has implemented an effective system to identify, assess, manage, respond to, and monitor risks to the university and its strategic objectives.</td>
</tr>
<tr>
<td>• Review risk information provided by management and the Audit and Compliance Committee, including the ERM annual report, University risk portfolio, and reports on the status of risk response.</td>
</tr>
<tr>
<td>• Understand and assess the risks inherent in the University’s strategy, and encourage management to pursue prudent risk to generate sustainable performance and value.</td>
</tr>
<tr>
<td>• Understand the key drivers of success for the University, and be knowledgeable about business management, governance, and emerging risks that may affect the University.</td>
</tr>
<tr>
<td>• Define the role of the full BOT versus its standing or other committees with regard to risks oversight.</td>
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<tr>
<th>BOARD OF TRUSTEES - AUDIT AND COMPLIANCE COMMITTEE</th>
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<tbody>
<tr>
<td>• Represent the BOT in providing oversight of the University’s ERM practices.</td>
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<tr>
<td>• Work with management to understand and agree on the types, frequency, and format of risk information that the BOT will review.</td>
</tr>
<tr>
<td>• Review risk information prior to its presentation to the full BOT, including the ERM annual report, University risk portfolio, and reports on the status of risk response.</td>
</tr>
<tr>
<td>• Receive regular reports on enterprise risks and the status of risk responses.</td>
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<tr>
<td>• On behalf of the full BOT, periodically assess the BOT’s Risk oversight process.</td>
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</tbody>
</table>
### SENIOR LEADERSHIP TEAM

- Lead the setting of strategic objectives for the University.
- Lead management discussions with the BOT regarding the University’s strategy and risk philosophy.
- Review and approve recommendations from the Enterprise Risk Management Advisory Committee.
- Review and approve risk information and ERM progress reports before they are submitted to the BOT Audit and Compliance Committee or the full BOT.
- Foster a risk aware culture through promotion of risk management practices, risk-based decision making, and establishing accountability for adherence to the risk appetite process by all management, faculty, and staff.

### DIVISION OF AUDIT – ENTERPRISE RISK MANAGEMENT

- Accountable to the President for overseeing the development, implementation, and fostering of a collaborative, campus wide approach to ERM.
- Lead the University’s processes for identifying, analyzing, evaluating, responding to and controlling, monitoring, and reporting on key risks.
- Oversee the Enterprise Risk Management Advisory Committee.
- Submit all relevant risk reports, including the ERM Annual Report, University risk portfolio, and status of risk response, to the Senior Leadership Team and the BOT - Audit and Compliance Committee.
- Report regularly to the BOT - Audit and Compliance Committee on enterprise risks and the status of risk response.
- Develop a comprehensive ERM education program for faculty and staff.
ENTERPRISE RISK MANAGEMENT ADVISORY COMMITTEE (ERMAC)

- Provide oversight, guidance, and coordination of University-wide efforts to implement the Committee of Sponsoring Organizations of the Treadway Commission (COSO) ERM Framework.
- Assist FAMU Senior Leadership Team, who have a primary or shared responsibility in managing risks within their assigned areas, with establishing and monitoring risk mitigation strategies and ensuring sufficient organizational support.
- Provide the President, Senior Leadership Team, and the BOT Audit and Compliance Committee with meaningful, actionable, and timely strategic and performance risk intelligence.

RISK OWNERS

- Identify, assess, manage and monitor risks.
- Insure risks are clearly articulated in risk statements.
- Assign responsibility for each of the sub-risks identified within an enterprise risk to various internal stakeholders.
- Integrate risk management into operational activities.
- Remediate gaps in mitigation and monitoring activities.

GENERAL COUNSEL

- Prepare for the President an independent assessment of ERMAC reports/recommendations from the legal perspective.

CHIEF COMPLIANCE AND ETHICS OFFICER

- Prepare for the President an independent assessment of ERMAC reports/recommendations from the compliance and privacy perspectives.
FAMU Risk Appetite Statement

Risk Reporting Structure
FAMU Risk Appetite Statement

Risk Appetite in Practice

Within the Desired Risk Appetite

**Risk Owner**
- Regularly monitor and assess risk level
- Continue to undertake standard risk management and risk assessment processes
- Ensure that existing controls are functioning effectively

**ERMAC**
- Continue to monitor risk levels across the University
- Regularly meet to discuss internal and external activities and events which may cause risk levels to rise or fall
- As new opportunities arise to advance strategic or performance goals, develop a risk profile for SLT to consider

Approaching the Desired Risk Appetite Level

**Risk Owner**
- Conduct a risk assessment to determine the likelihood of the risk exceeding established risk appetite levels and rate at which risk is rising
- Develop and implement additional risk treatment actions
- Notify manager and the Chief Risk Officer of the results of the risk assessment and risk treatment steps

**Chief Risk Officer**
- Convene special session of ERMAC to assess risk owner responses and impact to overall risk landscape
- Notify Chair, Audit and Compliance Committee

Exceeding the Desired Risk Level

**Risk Owner**
- Conduct an immediate risk assessment and implement risk treatment actions to reduce the risk to the appropriate risk appetite level
- Notify manager and the Chief Risk Officer of the results of the risk assessment and risk treatment steps

**Chief Risk Officer**
- Convene special session of ERMAC to assess risk owner responses and impact to overall risk landscape
- Meet with Senior Leadership Team to discuss risk impacts and action plans
- Notify Chair, Audit and Compliance Committee
Overall, in order to achieve its objectives, Florida Agricultural and Mechanical University recognizes that it is not possible, or necessarily desirable, to eliminate all of the risks which arise throughout the University’s inherent operations and the actions it implements to achieve its strategic goals and objectives. Acceptance of some risk is often necessary to foster growth, innovation, competitiveness and efficient business practices. Florida Agricultural and Mechanical University established Risk Levels, Risk Categories and associated Risk Appetites are listed below:

Risk Level Definitions

The definitions for interpreting Risk Appetite Statement in perspective of Leadership Core Positions, Strategic Plan Themes, and Strategic Enablers are detailed below.

<table>
<thead>
<tr>
<th>Risk Level</th>
<th>Risk Definition</th>
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</thead>
<tbody>
<tr>
<td><strong>Risk Averse</strong></td>
<td>Accepts as little risk as possible. Not willing to accept any negative impact beyond Core Position to pursue objectives.</td>
</tr>
<tr>
<td><strong>Risk Concerned</strong></td>
<td>Cautious approach to risk taking. Willing to accept a small negative impact to pursue objectives.</td>
</tr>
<tr>
<td><strong>Risk Neutral</strong></td>
<td>Potential negative impacts and accomplishment of objectives are given equal consideration.</td>
</tr>
<tr>
<td><strong>Risk Tolerant</strong></td>
<td>Greater than normal risks are tolerated. Willing to accept some negative impact to pursue objectives.</td>
</tr>
<tr>
<td><strong>Opportunity Seeking</strong></td>
<td>Willing for risks to be taken even if there is high uncertainty in order to gain highly valued reward. Focus is on achieving the reward but with due consideration of Core Positions. The expectation is still to make decisions that comply with all laws, rules, regulations, policies and procedures that govern the University.</td>
</tr>
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</table>
Risk Appetite Statement

Leadership Core Positions

University leadership has taken a position on the amount of risk it is willing to accept in relation to identified principles. Management decisions causing out-of-tolerance conditions must be referred to the Senior Leadership Team for consideration and action.

<table>
<thead>
<tr>
<th>Category</th>
<th>Principle Statement</th>
<th>Application of Principle Statements</th>
</tr>
</thead>
</table>
| **REPUTATION**                  | Recognizes that reputation is critical to our brand and market positioning and is **RISK AVERSE** regarding any of its activities that puts our reputation and ‘social license to operate’ in jeopardy; or could lead to loss of confidence by key stakeholders. | • Improving our rankings is critical in attracting high-performing students, academic talent, and business professionals; funding; and industry partnerships.  

• A reputation to be assessed in terms of our aspirations as a state and national leader in student success outcomes, research, and innovative teaching. |
| **GOVERNANCE, LEGAL & COMPLIANCE** | Is **RISK AVERSE** regarding intentional and material breaches of laws, regulation, statutes, policies, and professional standards.  

• Is **RISK AVERSE** regarding criminal breaches, fraud and corruption, misuse of office, or similar related activities  

• Is **RISK AVERSE** regarding risks relating to actions that may put accreditations and/or standards of operations in jeopardy. | • **A RISK AVERSE** tolerance for breach of our privacy obligations to students, staff and other stakeholders.  

• **AN OPPORTUNITY SEEKING** appetite for pursuing opportunities to efficiently and effectively meet the requirements of internal policies, procedures, and regulations.  

• **A RISK AVERSE** tolerance toward conditions which would inhibit transparency and accountability. |
| **FAMU VALUES**                 | Is **RISK AVERSE** regarding intentional and material breaches of FAMU Values and Code of Conduct.  

• Is **RISK AVERSE** regarding unlawful discrimination based on protected classes.  

• Is **RISK AVERSE** regarding violence, sexual misconduct, harassment, bullying, hazing, and any other inappropriate behavior and activities that puts our culture of “Excellence with Caring” in jeopardy. | • Cultivating a cohesive and positive culture and an operating environment that is performance-based, customer-focused, entails ethical decision-making, and helps direct organizational effort, energy, and resources towards the promotion, protection and overall success of FAMU.  

• Is **RISK CONCERNED** regarding any action that discriminates against members of the FAMU community. |
<table>
<thead>
<tr>
<th>Category</th>
<th>Principle Statement</th>
<th>Application of Principle Statements</th>
</tr>
</thead>
<tbody>
<tr>
<td>HEALTH AND SAFETY</td>
<td>• Is <strong>RISK AVERSE</strong> regarding safety management standards or practices that put the health and safety of our employees, students and visitors at risk.</td>
<td>• Management supporting and leading a strong safety culture.</td>
</tr>
<tr>
<td></td>
<td>• Management supporting and leading a strong safety culture.</td>
<td>• Expectation for employees and students to take personal responsibility for helping to protect their own wellbeing by following health and safety protocols.</td>
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<tr>
<td></td>
<td></td>
<td>• Innovative and prudent investment in strategies to protect the health and wellbeing of our employees, students and visitors with a focus on the elimination or minimization of high-risk safety hazards and activities.</td>
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<tr>
<td>FINANCIAL STABILITY</td>
<td>• Is <strong>RISK AVERSE</strong> regarding pursuing any strategy that puts at risk the financial sustainability of the University over the medium to long term.</td>
<td>• <strong>An OPPORTUNITY SEEKING</strong> appetite for attracting additional revenue streams and resources for priority areas.</td>
</tr>
<tr>
<td></td>
<td>• Is <strong>RISK AVERSE</strong> regarding any strategy or activity that would negatively impact the University’s Performance-Based Funding metrics.</td>
<td>• <strong>An OPPORTUNITY SEEKING</strong> appetite for supporting and sustain a robust university advancement enterprise.</td>
</tr>
<tr>
<td></td>
<td>• Is <strong>Risk Concerned</strong> regarding allocating existing resources to support activities that do not align with strategic priorities and goals.</td>
<td>• <strong>An OPPORTUNITY SEEKING</strong> appetite for securing new research-related awards.</td>
</tr>
<tr>
<td></td>
<td>• Is <strong>RISK CONCERNED</strong> regarding application of capital that is not planned and executed in a sustainable and prudent manner.</td>
<td>• Management fostering a strong internal controls environment to prevent actions that would result in financial harm to the university.</td>
</tr>
<tr>
<td>CRITICAL OPERATIONS</td>
<td>• Is <strong>RISK AVERSE</strong> for significant operational disruptions to critical student support and administrative operational and functions.</td>
<td>• <strong>An OPPORTUNITY SEEKING</strong> appetite toward activities for a comprehensive, coordinated and focused approach to effectively respond to and efficiently recover from disruptive incidents.</td>
</tr>
<tr>
<td></td>
<td>• Is <strong>RISK AVERSE</strong> for irrecoverable delays in teaching &amp; learning activities resulting in semester deliverables not being achieved and/or widespread student dissatisfaction due to unfavorable changes as a result of the disruption.</td>
<td></td>
</tr>
<tr>
<td></td>
<td>• Is <strong>RISK CONCERNED</strong> for significant loss to research including research resources, outcomes (actual or potential) and time.</td>
<td></td>
</tr>
</tbody>
</table>
FAMU Risk Appetite Statement

Strategic Plan Themes & Strategic Enablers

University leadership has taken a position on the amount of risk it is willing to accept in relation to its strategic plan themes and strategic enablers that support the overall strategic plan. The following statements serve as guidance for making risk-based decisions.

<table>
<thead>
<tr>
<th>Category</th>
<th>Principle Statement</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>STUDENT SUCCESS</strong></td>
<td>The University...</td>
</tr>
<tr>
<td></td>
<td>• Is <strong>OPPORTUNITY SEEKING</strong> toward activities and processes that elevate student success outcomes to the high excellence range among state and national scales.</td>
</tr>
<tr>
<td></td>
<td>• Is <strong>RISK CONCERNED</strong> for activities that would negatively impact FAMU’s drive to become the 1st Choice Destination among scholars.</td>
</tr>
<tr>
<td></td>
<td>• Is <strong>OPPORTUNITY SEEKING</strong> towards reimagining and aligning academic offerings to address emerging workforce demands and increased degree production in programs of strategic emphasis.</td>
</tr>
<tr>
<td><strong>ACADEMIC SUCCESS</strong></td>
<td></td>
</tr>
<tr>
<td></td>
<td>• Is <strong>OPPORTUNITY SEEKING</strong> with regards to pursuing pathways that position FAMU on a trajectory to become a Carnegie R1 institution.</td>
</tr>
<tr>
<td></td>
<td>• Is <strong>RISK TOLERANT</strong> to implementing activities and processes which nurture the professional development of faculty and staff across the career span and across disciplines to create a culture of sustainable excellence.</td>
</tr>
<tr>
<td></td>
<td>• Is <strong>OPPORTUNITY SEEKING</strong> towards positioning FAMU as a world-class leader in healthcare education, research, and service.</td>
</tr>
<tr>
<td><strong>LEVERAGE THE BRAND</strong></td>
<td></td>
</tr>
<tr>
<td></td>
<td>• Is <strong>Risk Concerned</strong> toward fostering a university-wide customer-centric culture to support academic and operational excellence.</td>
</tr>
<tr>
<td></td>
<td>• Is <strong>Opportunity Seeking</strong> towards activities that would increase the University’s standing as an internationally recognized leader in academic, research, and cultural institution.</td>
</tr>
<tr>
<td></td>
<td>• Is <strong>Opportunity Seeking</strong> towards activities that cultivate and diversify the network of advocates and supporters to advance the university’s mission and strategic priorities.</td>
</tr>
<tr>
<td><strong>LONG-TERM FISCAL HEALTH AND SUSTAINABILITY</strong></td>
<td></td>
</tr>
<tr>
<td></td>
<td>• Is <strong>Risk Averse</strong> toward implementing a planning and budgeting process that does not identify and secure new E&amp;G, C&amp;G, and Auxiliary funding to allocate toward strategic, business, and performance-based funding priorities.</td>
</tr>
<tr>
<td></td>
<td>• Is <strong>Risk Neutral</strong> towards implementing infrastructure enhancements in academics, research, administration, technology, and facilities to increase student success outcomes.</td>
</tr>
<tr>
<td></td>
<td>• Is <strong>Risk Averse</strong> toward activities that negatively impact alumni, friend, and corporate giving.</td>
</tr>
<tr>
<td>Category</td>
<td>Principle Statement</td>
</tr>
<tr>
<td>----------------------------------------------</td>
<td>--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------</td>
</tr>
</tbody>
</table>
| **ORGANIZATIONAL EFFECTIVENESS AND TRANSFORMATION** | • **Is OPPORTUNITY SEEKING** toward activities which foster a culture that builds and engages a high-performing workforce.  
• **Is OPPORTUNITY SEEKING** toward activities to enhance and innovate processes to optimize the effectiveness of operations.  
• **Is OPPORTUNITY SEEKING** toward activities which foster a culture of strategic decision making through promotion and enhancement of compliance, internal controls, and enterprise risk management practices with an emphasis on engagement, education, reporting, and accountability. |
| **ORGANIZATIONAL CULTURE**                  | • **Is OPPORTUNITY SEEKING** towards establishing a collaborative, collegiate, performance-focused, agile and flexible culture that will enable organizational change to happen more readily and productively.  
• **Is OPPORTUNITY SEEKING** towards activities that build a highly diverse, equitable and inclusive culture of belonging for our students, faculty, and staff.  
• **Is OPPORTUNITY SEEKING** toward activities that foster and enhance data-driven decision making that furthers progress towards strategic, business and performance-based funding goals.  
• **Is OPPORTUNITY SEEKING** toward activities that enable the free flow of information up and down the University hierarchy.  
• **Is OPPORTUNITY SEEKING** toward activities that enable consistent delivery of customer service that meet or exceed expectations and optimizes the interactions between the University, our students, and other stakeholders. |
| **SYSTEMS AND INFORMATION MANAGEMENT**      | • Recognizes the critical need to protect and has a RISK CONCERNED tolerance for activities, events, or behaviors that adversely impact the confidentiality, integrity, and availability of all critical business information.  
• Has a RISK CONCERNED appetite for the loss or breach of its business and customer data in pursuit of its goals. Information assets will be protected in alignment with the University’s data governance framework.  
• Has an OPPORTUNITY SEEKING appetite to invest in innovative solutions that increase efficiency in systems and processes across both academic and enabling activities. |
Appendix 1. Document Administration

Authority

The Board of Trustees is the only authority that may approve this document and any recommended updates to this document and any other policies relating to Risk management. (Refer to the Board of Trustees: Operating Procedures - #10.4: Regulation Development, Rulemaking, and Policy and Policy 2019-01 – Internal Controls and Enterprise Risk Management)

Review

This document is to be reviewed annually to ensure that all detail is accurate and reflective of Florida A&M University’s current risk profile.

Status and Details

<table>
<thead>
<tr>
<th>Status</th>
<th>Version 2</th>
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<tbody>
<tr>
<td>Effective Date</td>
<td>September 28, 2023</td>
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<tr>
<td>Approval Authority</td>
<td>Board of Trustees</td>
</tr>
<tr>
<td>Approval Date</td>
<td>September 28, 2023</td>
</tr>
</tbody>
</table>

_____________________________  _____________________
AVP for Audit & Chief Risk Officer  Date

_____________________________  _____________________
President  Date

_____________________________  _____________________
Chair, Board of Trustees  Date
(Revised)
Division of Audit
FY 2023-2024
Work Plan
Report #22-23-008
October 11, 2023
EXECUTIVE SUMMARY

This executive summary provides an update on the annual Division of Audit work plan approved by the Board of Trustees in June 2023. The Division of Audit has encountered significant staffing challenges since the plan’s approval, including the departure of the Lead Senior Auditor and the unfunded request for enterprise risk management staff members as part of the budget process.

In light of the staffing impacts, the Division of Audit has made strategic adjustments to the approved work plan, prioritizing essential areas of focus. As a result, certain projects and initiatives will be removed or scaled back in the current fiscal year. Removed projects will be reconsidered as part of the risk assessment and plan for the coming fiscal year. Changes are summarized below.

1. Removed Projects:
   - Operational Audit of Property Management Function
   - Risk Based Budgeting Tools
   - Risk and Controls Certification Program
   - Crisis Management Toolkit
   - Athletics Risk Toolkit

2. Reduced Initiatives:
   - The frequency of risk bulletins will be decreased due to limited staffing.
   - The availability of on-demand Enterprise Risk Management (ERM) training courses will be scaled back.

The primary goal of these work plan adjustments is to ensure that the remaining projects and initiatives can be executed effectively, focusing on critical areas, while maintaining a high level of quality.

The Division of Audit remains committed to upholding its core responsibilities and contributing to the organization's risk management efforts. The decision to modify the work plan has been taken with careful consideration of the available resources and the need to deliver impactful outcomes.

The Division of Audit appreciates the ongoing support of the Board of Trustees and the understanding of all stakeholders as it navigates through these staffing challenges. Efforts will be directed towards optimizing the use of existing resources to deliver value and ensure the organization's risk management objectives are met.
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<td>8</td>
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</tbody>
</table>
BACKGROUND

Professional auditing standards\(^1\) state that the chief audit executive (CAE) must establish a risk-based plan to determine the priorities of the internal audit activity, consistent with the organization’s goals. Additionally, the CAE must review and adjust the plan, as necessary, in response to changes in the organization’s business, risks, operations, programs, systems, and controls. The CAE must then communicate the internal audit activity’s plans and resource requirements, including significant interim changes, to senior management and the board for review and approval.

Every entity exists to realize value for its stakeholders. Value is created, preserved or eroded by management decisions in all aspects of an entity’s activities, from strategy setting to daily operations. Entities failing to recognize the risks they face, from external or internal sources, and to manage them effectively, can destroy value. An effective starting point for understanding risk is to take a look at all aspects of an entity’s activities.

The 2023-2024 Audit Work Plan, was developed based on information from a university-wide risk assessment that included risk surveys, workshops, and other channels of communication with leadership, faculty, staff, and students. The top ten risks for the university are identified in the chart below.

<table>
<thead>
<tr>
<th>FAMU TOP 10 RISKS for FY 2023 - 2024</th>
</tr>
</thead>
<tbody>
<tr>
<td>1  Campus Safety and Security</td>
</tr>
<tr>
<td>2  Talent Management</td>
</tr>
<tr>
<td>3  IT/Cybersecurity</td>
</tr>
<tr>
<td>4  Staff and Student Mental Health</td>
</tr>
<tr>
<td>5  Organizational Change Management</td>
</tr>
</tbody>
</table>

The internal audit and enterprise risk management function work plans are designed to address high risk areas of the university and support the achievement of [Boldly Striking, Florida A&M University’s (FAMU) 2022-2027 Strategic Plan](#).

---

\(^1\) International Standards for the Professional Practice of Internal Auditing (Standards) – Performance Standards 2010 Planning
INTERNAL AUDIT RESOURCES

The Division of Audit has the following staff to support the internal audit function and work plan.

Joseph Maleszewski
VP for Audit/CAE
(1800 Hours)

Deidre Melton
AVP for Audit/CRO
(900 Hours)

Vacant
Sr. Auditor & Investigator
(1400 Hours)

Trystal Wright
Sr. Auditor & Investigator
(1800 Hours)

William Thomson
Sr. IT Auditor & Investigator
(1800 Hours)

Erica Thames
Sr. Auditor & Investigator
(1800 Hours)

Crisencia Brown
Auditor & Investigator
(1800 Hours)

Rasheedat McKay
Auditor & Investigator
(1800 Hours)
# INTERNAL AUDIT WORK PLAN

## Board of Trustees (Mandatory)
- Athletics Financial Review - Fall 2023
- Athletics Financial Review - Spring 2023

## Florida Board of Governors (Mandatory)
- Performance-based Funding Data Integrity Audit (Strategic Priority 4)
- Foreign Influence Audit (Strategic Priority 2)
- Post-Tenure Review Audit (Strategic Priority 2)

## Operational
- Campus Safety & Security (Strategic Priority 5)

## Academic Affairs Advisory Services
- Colleges & Schools: Performance Based Funding (Strategic Priority 4)
- Colleges & Schools: National Rankings (Strategic Priority 1 - 2)
- Colleges & Schools: Strategic Plan (Strategic Priorities 1 - 5)
- Colleges & Schools: Operations (Strategic Priority 5)

## IT/Cybersecurity
- Cybersecurity Maturity Model Certification Level 1 Self-Assessment (Strategic Priority 2)
- Gramm-Leach Bliley Act Audit ( Strategic Priority 5)

## FAMU Committees
- Athletic Action Plan Implementation Team and Workgroup (Strategic Priority 5)
- Metrics and Rankings Workgroup (Strategic Priorities 1 - 5)
- Civil Discourse Committee (Strategic Priority 1 - 2)

## Training and Awareness
- Fraud Awareness Week (Strategic Priority 5)
- Internal Audit Awareness Month (Strategic Priority 5)
- FAMU Fundamentals (Strategic Priority 5)
- FAMU Management Seminar (Strategic Priority 5)

## DoA Services
- External Audit Coordination
- Investigative Services
- Management Requests
- Audit, Advisory, & Investigative Follow-up
ENTERPRISE RISK MANAGEMENT RESOURCES

The Division of Audit has the following staff to support the ERM function and work plan.

Deidre Melton  
AVP for Audit & Chief Risk Officer  
(900 Hours)

William Knight  
ERM Coordinator  
(1800 Hours)

Additional assistance is expected through the Federal Work Study Program. This program allows for the ERM function to receive two student workers for approximately 15 hours per week during the Fall and Spring terms. Additionally, the Division of Audit was awarded the 2023 URMIA Student Internship Fund which provides the funding for FAMU to award a paid internship for one student for approximately 20 hours per week during the Fall and Spring terms.
ENTERPRISE RISK MANAGEMENT WORK PLAN

ERM Purpose and Scope
• ERM Policy Review
• Risk Appetite Statement Review
• Strategic Plan Risk Assessment

ERM Centralization and Accountability
• ERMAC: Strategic and Performance
• ERMAC: Operational Risk Managers (Cohort 1)

ERM Process
• Risk Workshops
• University Risk Assessment
• Risk Mitigation
• Risk Alerts - Emerging Risks
• Risk Bulletins

Campus Risk Management Culture
• ERM Awareness Week
• ERM On-Demand Training Courses
• ERM Newsletter and Infographics
• Risk Culture Survey

Special Projects
• Artificial Intelligence Risk Toolkit
• ERM Standard Operating Procedures
STATEMENT OF ACCORDANCE

The Division of Audit's mission is to enhance and protect the value of FAMU and its stakeholders by providing excellence in risk-based and objective assurance, advice, and insight through the promotion of accountability, integrity, and efficiency.

We developed the work plan in accordance with the International Standards for the Professional Practice of Internal Auditing. Those standards require we plan and conduct a risk assessment to use as a basis for the development of the audit work plan aligned with university goals. We believe the evidence obtained provides a reasonable basis for our risk assessment and conclusions based on our objectives.

Please address inquiries regarding this report to the Division of Audit at (850) 412-5479.

https://www.famu.edu/administration/audit/
Division of Audit
Board Report

October 11, 2023

Joseph Maleszewski
Vice President of Audit & Chief
Audit Executive

Deidre Melton
Associate Vice President of Audit & Chief Risk Officer
Dear Members of the Board of Trustees

Congratulations to all of our new trustees on their appointment to the FAMU BOT! I thank each of you for your commitment to serve in this important fiduciary role and hope to help better prepare you for service. You each received information from me regarding my roles as Vice President for the FAMU Division of Audit; Chief Audit Executive; and the Inspector General with a functional reporting relationship to the BOT through the Chair and Chair of the Audit and Compliance Committee. I shared information available about these various roles on the Division’s website at: Division of Audit (famu.edu) as well as the Division of Audit Charter which describes our authorities, standards, roles, and responsibilities.

Service as a trustee is an important responsibility performed in a complex and dynamic governance structure. To assist our new trustees, I previously provided two PowerPoint presentations which I have used to brief trustees on our governance structure and important related topics such as open government, public records and the code of ethics for public employees and officers. I am happy to resend this information to any trustee who would like to review it.

I want to take this opportunity to readdress a few key concepts. The Board of Trustees has a fiduciary duty and responsibility to act in the best interests of FAMU and its stakeholders. This fiduciary duty is a legal and ethical obligation that requires trustees to make decisions and take actions that prioritize the university's well-being and the interests of its students, faculty, staff, alumni, donors, and the broader community. Here are some key aspects of the Board of Trustee’s fiduciary duty and responsibility:

- **Duty of Care**: Trustees are expected to exercise a reasonable degree of care and diligence when making decisions on behalf of the university. This involves being well-informed about the university's operations, finances, and strategic goals. Trustees should attend board meetings, review relevant materials, ask questions, and actively participate in discussions to ensure informed decision-making.

- **Duty of Loyalty**: Trustees must put the university's interests above their personal interests and avoid conflicts of interest that could compromise their ability to act impartially. This means avoiding situations where personal gain or external relationships could influence their decision-making process. If a conflict of interest arises, trustees should disclose it and, if necessary, recuse themselves from related discussions and decisions.

- **Duty to Act Prudently**: Trustees have a responsibility to manage the university's assets and resources prudently. This includes overseeing the university's financial health, investments, and expenditures to ensure long-term sustainability. Trustees should make decisions that are in line with the university's mission and strategic objectives.

- **Duty to Uphold the Mission**: Trustees must work to uphold the university's mission, values, and educational goals. They should ensure that their decisions align with the university's purpose and contribute to its overall success.

- **Duty to Exercise Independent Judgment**: Trustees are expected to exercise independent judgment and make decisions that are in the best interests of the university, even if those decisions are not universally popular or easy. They should prioritize the long-term interests of the institution over short-term gains or political considerations.

- **Transparency and Accountability**: Trustees should maintain transparency in their decision-making processes and communicate effectively with stakeholders. They are accountable for their
decisions and actions and should be prepared to justify and explain their choices to the university community and the public.

- **Legal and Regulatory Compliance:** Trustees must ensure that the university operates in compliance with relevant laws, regulations, and accreditation standards. They should be aware of legal obligations and take steps to mitigate risks to the institution.

- **Monitoring and Oversight:** Trustees have a responsibility to oversee the university's management, administration, and financial performance. Regular evaluations of the university's leadership and policies are essential to ensure that FAMU is on the right track.

It is my goal to assist each of you in carrying out these duties. One last reminder: “Noses in, fingers out” is AGB’s unofficial mantra of board engagement—the board’s role is to oversee the execution of strategies and policy development without crossing the line into the tactical micromanagement of day-to-day operations.

All the best,

Vice President for Audit and Chief Audit Executive
Subject: Successful Staff Retreat and Ongoing Initiatives

Dear Members of the Board of Trustees,

I am delighted to share with you the outcomes of our recent staff retreat, which focused on critical university initiatives related to customer service, accountability, and the unique contributions of our auditors. This retreat marked a significant milestone in our ongoing commitment to excellence, and I am pleased to report our progress to you.

During the retreat, our dedicated team of auditors engaged in meaningful discussions and collaborative exercises that underscored the importance of exceptional customer service and accountability in our roles. We reaffirmed our commitment to not only identify areas for improvement but also to actively contribute to enhancing the overall value and efficiency of our university operations.

I am excited to highlight several key initiatives that our audit team is diligently working on to drive operational efficiency and promote best practices:

1. **Financial Aid Audit:** We are in the midst of a comprehensive audit of our financial aid processes, with the goal of ensuring compliance, transparency, and fair access to financial resources for our students. This audit will play a pivotal role in safeguarding the integrity of our financial aid programs.

2. **Controller's Office Control Self-Assessment:** Our auditors are collaborating closely with the Controller's Office to conduct a thorough control self-assessment. This initiative aims to strengthen internal controls, mitigate risks, and enhance financial accountability throughout the university.

3. **Academic Affairs Advisory:** We are actively engaged in advising Academic Affairs on strategies to optimize resources, streamline processes, and ensure alignment with our institution's goals. This partnership will contribute to the continued success of our academic programs.

These initiatives reflect our unwavering commitment to the university's mission and our dedication to fostering a culture of continuous improvement. By addressing these critical areas, we are not only enhancing our internal processes but also elevating the overall quality of our institution.

As we embark on the new fiscal year, I am excited to share with you our ongoing commitment to fortify and expand our Enterprise Risk Management (ERM) program at the university. The past year has been characterized by remarkable progress in understanding and mitigating risks across various domains, and I am eager to build upon these achievements in the coming months.

I am thrilled to highlight the upcoming event that signifies our commitment to innovation and proactive risk management. Our Senior Leadership Team will be participating in a groundbreaking Artificial Intelligence Risk Workshop. This workshop aims to harness the power of artificial intelligence in fostering a deeper understanding of emerging challenges. This workshop stands as a testament to our dedication to fostering a culture of continuous improvement and adaptability in risk management. The success of our ERM program rests on the collaborative efforts of our entire university community, and I am grateful for the collective commitment to safeguarding our institution's integrity and reputation.

As we move forward, your support and guidance remain invaluable to our success. We remain dedicated to refining our risk governance processes, increasing operational efficiency, fostering cross-functional collaboration, and empowering all stakeholders to contribute to the success of our institution. By
embracing these principles, we are confident in our ability to navigate complexities, seize opportunities, and sustain our position as a leader in higher education.

Warm regards,

Deidre Melton
Associate Vice President for Audit and Chief Risk Officer
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Internal Audit Activities

Audit Work Plan

<table>
<thead>
<tr>
<th>Project</th>
<th>Projected Completion</th>
<th>Status</th>
<th>Issues Identified</th>
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<tr>
<td>Financial Aid Audit</td>
<td>Quarter 1</td>
<td>In-Progress</td>
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<td>Athletics Financial Review: Spring 2023</td>
<td>Quarter 2</td>
<td>Pre-Planning</td>
<td>N/A</td>
</tr>
<tr>
<td>Gramm Leach Biley Act</td>
<td>Quarter 2</td>
<td>Not Started</td>
<td>N/A</td>
</tr>
<tr>
<td>Performance-Based Funding Data Integrity Audit</td>
<td>Quarter 3</td>
<td>Not Started</td>
<td>N/A</td>
</tr>
<tr>
<td>Athletics Financial Review: Fall 2023</td>
<td>Quarter 3</td>
<td>Not Started</td>
<td>N/A</td>
</tr>
<tr>
<td>Post-Tenure Review Audit</td>
<td>Quarter 4</td>
<td>Pre-Planning</td>
<td>N/A</td>
</tr>
<tr>
<td>Foreign Influence Audit</td>
<td>Quarter 4</td>
<td>Not Started</td>
<td>N/A</td>
</tr>
<tr>
<td>Property Management Audit</td>
<td>Deferred</td>
<td>Not Started</td>
<td>Deferred to FYE 2025</td>
</tr>
</tbody>
</table>

Status of Correct Actions for Open Audit Issues since June 2023

Florida Board of Governors Regulation 4.002 State University System Chief Audit Executive, Section 3(b) requires the chief audit executive to report on the progress made by management in implementing corrective actions.

6 Open Audit Issues

DAVID Audit (Open Issues: 3)

Executive Owner: W. Rebecca Brown, Vice President for Finance and Administration

- **User Inactivation Workflow** – A sample of separated users in the DAVID system were not being inactivated in a timely manner as required by the DHSMV MOU. An internal workflow is being implemented to facilitate the deactivation process. This workflow will include documentation of the request and deadline for a user to be inactivated in DAVID and return documentation from the
DAVID system administrator that the user has been inactivated within the appropriate timeframe. (Status- OPEN; Risk Level- HIGH)

- **System Usage Monitoring** – Documentation that user activity in the DAVID system was being monitored as part of each required Quarterly Quality Control review was not able to be received. The Department will be adhering to the Florida Highway Safety and Motor Vehicles Audit Guide as a resource to document the user activity monitoring process and outputs. Quarterly Quality Control Reviews will be signed off by the DAVID administrator and their supervisor to assure that reviews, which include user activity monitoring, were performed appropriately. (Status- OPEN; Risk Level- HIGH)

- **Annual Training Compliance** – A sample of DAVID users were not compliant with the Department’s annual training requirements. The DAVID administrator will be implementing a process to verify user compliance with annual training as part of each Quarterly Quality Control Review. User training verification processes will be included in the departmental general DAVID procedures. (Status- OPEN; Risk Level- LOW)

**Bragg Stadium Safety and Security (Open Issues: 2)**

Executive Owner: Tiffani-Dawn Sykes, Vice President for Athletics/AD

- **ADA Guardrail Compliance** - The height (in certain areas) and construction of the guardrails are not compliant, in accordance with the Florida Building Code: FBC-B 1015. The University is currently looking at the most cost-effective way to address this concern and is awaiting design and pricing from the consultant/general contractor. Until these areas are addressed, the Building code official recommended that the University install “caution signage” to bring awareness to the individuals seated in these areas. (Status- OPEN; Risk Level- LOW)

- **ADA Restroom Compliance** – Restrooms are not fully ADA compliant, in accordance with certain elements of Florida Building Code *Chapter 6: Plumbing Elements and Facilities*. The University is currently looking at the most cost-effective way to address this concern and is awaiting design and pricing from the consultant/general contractor. Until these areas are addressed, the University has contracted with a vendor to provide ADA accessible restrooms during events held at the stadium. (Status- OPEN; Risk Level- LOW)

**Emergency Preparedness (Open Issues: 1; Closed Issues: 2)**

Executive Owner: W. Rebecca Brown, Vice President for Finance and Administration

- **Establishing an Evacuation Plan** - The Evacuation Plan has been finalized with the supporting essential employee plan. The plan was updated on lessons learned from hurricane Ian. The crisis communication plan will need to be enhance based on feedback received during the May 23, 2023, hurricane table top exercise. (Status- OPEN; Risk Level- HIGH)

- **Identify A Dedicated Funding Source for Emergency Preparedness** - As part of the budget process for the 2023-2024 fiscal year, an Emergency Management department was established. The budget included funding for additional emergency management positions and emergency preparedness expenses. (Status- CLOSED)

- **Hardening a Building on FAMU Campus.** On July 20, 2022, the Florida Division of Emergency Management advised our university that Al Lawson meets their standards to shelter students, faculty, and staff. No retrofit or funding is needed. The University can shelter approximately 2,200 people in the Al Lawson. The University has a long-term plan to retrofit additional buildings to increase shelter space. (Status- CLOSED)
Security Plan Audit (Open Issues: CONFIDENTIAL)

Executive Owner: Robert Seniors, Vice President for Information Technology Services/CIO

- The referenced audit issues are considered confidential in accordance with Florida Statute 1004.055 Security of Data and Information Technology in State Postsecondary Education Institutions. A detailed review of progress made on corrective actions taken to resolve issues identified during the 2022 Security Plan Audit will be provided to Board of Trustees members during the December 7, 2023, Cybersecurity Closed Door Session. Board members are entitled to a one-on-one briefing prior to this meeting and can request a briefing by contacting Joseph Maleszewski, Vice President for Audit/CAE at joseph maleszewski@famu.edu.
The Division of Audit functions as the University’s official liaison for external auditors to assist management with meeting the requests and understanding various audit requirements. We also monitor the implementation status of audit recommendations, including recommendations with long implementation timelines to ensure they are progressing.

The chart below provides an overview of external audits currently in-progress or recently concluded since our June 8, 2023, report to the Audit and Compliance Committee.

<table>
<thead>
<tr>
<th>Audit</th>
<th>Current Status</th>
<th>Corrective Action Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>Florida Auditor General Financial Statements Audit (FY2023)</td>
<td>In-Progress</td>
<td>N/A</td>
</tr>
<tr>
<td>Thomas, Howell, Ferguson (THF) Athletics Financial Statement Audit (FYE 2022)</td>
<td>In-Progress</td>
<td>N/A</td>
</tr>
<tr>
<td>Thomas, Howell, Ferguson (THF) Athletics Agreed Upon Procedures (FYE 2022)</td>
<td>In-Progress</td>
<td>N/A</td>
</tr>
<tr>
<td>Thomas, Howell, Ferguson (THF) Athletics Financial Statement Audit (FYE 2023)</td>
<td>In-Progress</td>
<td>N/A</td>
</tr>
<tr>
<td>Thomas, Howell, Ferguson (THF) Athletics Agreed Upon Procedures (FYE 2023)</td>
<td>In-Progress</td>
<td>N/A</td>
</tr>
</tbody>
</table>
| Thomas, Howell, Ferguson (THF) Athletics Action Plan Assurance Service | Complete | Corrective actions are in process for the four reported recommendations.  
- **Recommendation #1**: Continued monitoring and development of control activities.  
- **Recommendation #2** – Departmental alignment and future considerations.  
- **Recommendation #3** - Transfer athletes and academic major change challenges.  
- **Recommendation #4** - Financial Aid |

**Athletic Action Plan (ACP) Assurance Services**

Executive Owner: Tiffani-Dawn Sykes, Vice President for Athletics/AD  
ACP Workgroup Chair: Donald Palm, Executive Vice President/COO

The recommendations from the ACP audit report from Thomas Howell Ferguson is currently in the process of being integrated into the Athletic Action Plan. This process is expected to be completed by September 30, 2023. A modified Athletic Action Plan, with status on all action plan items, will be distributed to Board of Trustees members in October 2023.
Advisory Work Plan

<table>
<thead>
<tr>
<th>Project</th>
<th>Projected Completion</th>
<th>Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>Academic Affairs: Faculty &amp; Student Experience</td>
<td>Quarter 1</td>
<td>In Progress</td>
</tr>
<tr>
<td>Academic Affairs: Performance Based Funding</td>
<td>Quarter 2</td>
<td>Not Started</td>
</tr>
<tr>
<td>Academic Affairs: National Rankings</td>
<td>Quarter 2</td>
<td>Not Started</td>
</tr>
<tr>
<td>Academic Affairs: Strategic Plan</td>
<td>Quarter 3</td>
<td>Not Started</td>
</tr>
<tr>
<td>Academic Affairs: Operations</td>
<td>Quarter 4</td>
<td>Not Started</td>
</tr>
<tr>
<td>Cybersecurity Maturity Model Certification Level 1 Assessment</td>
<td>Quarter 3</td>
<td>Not Started</td>
</tr>
<tr>
<td>Campus Safety &amp; Security</td>
<td>Quarter 4</td>
<td>Not Started</td>
</tr>
</tbody>
</table>

**Status of Correct Actions for Open Advisory Issues since June 2023**

Institute of Internal Audit Standards, *2500 – Monitoring Progress*, requires the internal audit activity to monitor the disposition of results of consulting engagements to the extent agreed upon with the client. The Division of Audit monitors corrective actions only for recommendations accepted by management during the consulting engagement. Accepted recommendations and corrective action plans are confirmed by both the division vice president and chief operating officer for monitoring.

**2022 Procurement Services**

Executive Owner: W. Rebecca Brown, Vice President for Finance and Administration

- A management action plan has been developed to address 34 Division of Audit recommendations. The most recent Division of Finance and Administration update provided on September 7, 2023, indicates that 9 recommendations have been successfully implemented; 16 recommendations are planned for future implementation; 3 are past the original established implementation date; and 6 recommendations require additional discussion and likely revision.

**2022 Title IX Control Self-Assessment (Open Recommendations: 12)**

Executive Owner: Rica Calhoun, Chief Compliance and Ethics Officer

- There are three actions open in relation to needed updates to policies and procedures based on regulations, guidance, and best practices. (Corrective Actions are On-Schedule)
- There are six actions open in relation to process enhancements needed to improve efficiency and effectiveness of the Title IX program. (Corrective Actions are On-Schedule)
- There is one action open in relation to expanding staff training and certification opportunities. (Corrective Actions are On-Schedule)
- There are two actions open in relation to enhancements to education and communication of Title IX services and requirements to faculty, staff, and students. (Corrective Actions are On-Schedule)
Remote Work - IT Controls (Open Recommendations: CONFIDENTIAL)

Executive Owner: Robert Seniors, Vice President for Information Technology Services/CIO

- The referenced advisory recommendations are considered confidential in accordance with Florida Statute 1004.055 Security of Data and Information Technology in State Postsecondary Education Institutions. A detailed review of progress made on corrective actions taken to resolve issues identified during the 2022 Security Plan Audit will be provided to Board of Trustees members during the December 7, 2023, Cybersecurity Closed Door Session. Board members are entitled to a one-on-one briefing prior to this meeting and can request a briefing by contacting Joseph Maleszewski, Vice President for Audit/CAE at joseph.maleszewski@famu.edu.
The Division of Audit is responsible for investigating significant and credible allegations of fraud, waste, and abuse attributed to University employees, contractors, and vendors. Our primary objective is to detect, deter, and prevent instances of fraud, waste, and abuse that could adversely affect the University.

The Division manages various cases, including investigations, preliminary inquiries, and management referrals, while collaborating on other Department referrals. Additionally, our Division evaluates statutory whistle-blower information, determines whistle-blower designations, and coordinates all related activities in compliance with the Florida Whistle-blower’s Act.

The Division ensures excellence in our investigation services by operating in accordance with the Standards for Complaint Handling and Investigations for the State University System of Florida and the Association of Inspectors General Quality Standards for Investigations.

**2022-2023 Fiscal Year-End Complaints Received**

At the conclusion of FY 2022-2023, the Division of Audit received 28 investigation inquires including referrals received from other partnering University departments. Among those inquiries, 14 cases are currently open, eight are closed, and six cases, that did not meet investigative criteria, were referred for management review and response. The Division also received two complaints that contained information of the type described in Section 112.3187(5)(a), Florida Statute and therefore, complainants were designated Whistle-Blower status.

<table>
<thead>
<tr>
<th>Status</th>
<th>Number</th>
</tr>
</thead>
<tbody>
<tr>
<td>Open</td>
<td>14</td>
</tr>
<tr>
<td>Complete</td>
<td>8</td>
</tr>
<tr>
<td>Monitored Management Referrals</td>
<td>6</td>
</tr>
</tbody>
</table>

Our office currently has 17 open investigative cases, of which three investigations were initiated in the prior fiscal year.
Open Investigation Case Itemization

Of the 17 active investigations, (4) 24% pertain to Fraud, (4) 24% relate to General Concerns, and (3) 18% are associated with Accounting and Auditing matters. This underscores the need for additional fraud awareness and prevention training, as well as enhancements to university accounting practices.

<table>
<thead>
<tr>
<th>Open Investigative Issues</th>
<th>Count</th>
<th>%</th>
</tr>
</thead>
<tbody>
<tr>
<td>Fraud</td>
<td>4</td>
<td>24%</td>
</tr>
<tr>
<td>General Concern</td>
<td>4</td>
<td>24%</td>
</tr>
<tr>
<td>Accounting and Auditing</td>
<td>3</td>
<td>18%</td>
</tr>
<tr>
<td>Conflict of Interest *</td>
<td>1</td>
<td>6%</td>
</tr>
<tr>
<td>Discrimination or Harassment *</td>
<td>1</td>
<td>6%</td>
</tr>
<tr>
<td>Legal or Regulatory Violation</td>
<td>1</td>
<td>6%</td>
</tr>
<tr>
<td>Other</td>
<td>1</td>
<td>6%</td>
</tr>
<tr>
<td>Sexual Harassment</td>
<td>1</td>
<td>6%</td>
</tr>
<tr>
<td>Waste, Abuse, Misuse of Institution Resources</td>
<td>1</td>
<td>6%</td>
</tr>
</tbody>
</table>

*Although these issues originated as either a conflict of interest or discrimination or harassment they contained elements appropriate for the Division of Audit jurisdiction.

Status of Management Actions for Open Investigation Recommendations since June 2023

The Division worked to obtain an understanding of management actions taken since our last report to the Audit and Compliance Committee. The following table summarize the status of those management actions and is followed by detailed information.
Department of Athletics (5 Open Recommendations)
The Department of Athletics completed corrective actions related to 10 of 15 investigation-related recommendations. The status of the remaining 5 items is included in the following paragraphs.

Executive Owner: Tiffani-Dawn Sykes, Vice President and Director of Intercollegiate Athletics

- **Develop and maintain an inventory control system** – Part-time staff were hired in January 2023 and August 2023 to assist in this area. Athletics acquired three quotes and selected a vendor. The contract has been submitted by staff to General Counsel for final review prior to obtaining a purchase order. The inventory software has been purchased and staff are in the process of being trained on the software. Inventory will be signed out by the recipient. Athletics will work with Property Records, when appropriate, to ensure proper disposal. There are best practices which support the sale of equipment and apparel to the community. Athletics is also looking to provide surplus to DRS. Athletics has reached out to the Equipment Office and Property Records to determine the appropriate procedures for disposal of property.
  (Status – Open; Risk Level - Moderate; Anticipated Completion - September 30, 2023)

- **Develop and implement a method for tracking apparel that is given to University employees, and work with the Division of Finance and Administration to ensure proper reporting of apparel as additional income in accordance with IRS guidelines** - The Athletics Department purchased inventory software which is currently being used by the department. In addition, the Department is currently in the process of collaborating with Division of Finance and Administration regarding this issue.
  Status – Open; Risk Level - Moderate; Anticipated Completion – November 30, 2023)

- **Develop a process to issue per diem directly to students** - Athletics will continue to consult with leaders within Finance and Administration Controller’s Office regarding a solution around this matter.
  (Status – Open; Risk Level – Low; Anticipated Completion - December 21, 2023)

- **Establishing Vendor Fee Revenue Controls** – The Athletics Department will provide staff will be provided adequate and continuous training in this area. Return staff and new staff will participate in the annual cash collection training provided by Finance and Administration. The cash management training has been scheduled and it is anticipated that all annual cash management training will be completed by September 12, 2023.
  (Status – Open; Risk Level - Moderate; Anticipated Completion - September 12, 2023)

- **Maintain complete and accurate records charged and paid by vendors** - Athletics performed vendor game analysis for the 2022 season. Athletics will implement a tag system for vendor identification and monitoring purposes for the 2023 Football season and other events as designated. This enhancement will assist to address unauthorized and subletting vendors set ups. Improvements are ongoing.
  (Status – Open; Risk Level - Moderate; Anticipated Completion - September 30, 2023)

Meek-Eaton Black Archives Montague Collection (1 Open Recommendation)

Executive Owner: Allyson Watson, Ph.D., University Provost and Vice President of Academic Affairs
• Ensure Montague Collection agreement is in place for University possession:
  Recommendation: The MEBA Director and General Counsel are working with the collection
  owner to remove the items from the Archives in late October 2023.
  (Status – Open; Risk Level – Moderate; Anticipated Completion – October 31, 2023)

Department of Safety and Security Staffing Level (Open Recommendation 1)

Executive Owner: W. Rebecca Brown, Vice President for Finance and Administration
• Evaluate campus security staffing levels: Management action plan under develop.
  (Status – Open; Risk Level – High; Anticipated Completion - TBD)
On June 29, 2023, the Division of Audit held a productive staff retreat and chartered our course forward. There were many outstanding outcomes of our recent staff retreat, which focused on crucial university initiatives centered around customer service, accountability, and the contributions of our Internal Audit team.

Our keynote speaker, Dr. Maurice Edington, Chief Operating Officer, provided an inspiring platform for introspection, growth, and charting our path forward. Dr. Edington emphasized the immense value our Internal Audit shop brings to the university, both in its current role and as we navigate a period of restructuring. His charge underscored the transformative potential we hold in advisory work, control assessments, operational efficiency enhancements, and risk management. We are fully committed to embracing these responsibilities and leveraging our expertise to support the university's strategic goals.

One of the highlights of the retreat was an interactive session led by our Chief Privacy Officer, LaTonya Baker. This session encouraged our staff to recognize their unique strengths and vulnerabilities, symbolized as "superpowers" and "kryptonite." It was a powerful exercise that not only fostered self-awareness but also emphasized the strength of a diverse and collaborative team. This insight will undoubtedly empower us to work more cohesively and effectively.

Furthermore, during the retreat, the division conducted a SOAR analysis, delving into our Strengths, Opportunities, Aspirations, and Results. This exercise provided a clear roadmap for our future initiatives and reaffirmed our commitment to excellence in all that we do.

As we move forward, we are excited about the positive impact we can have on the university's growth and success. We look forward to the challenges and opportunities ahead and remain dedicated to upholding the highest standards of service, accountability, and performance.
PROFESSIONAL DEVELOPMENT

The Division of Audit prioritizes professional development of our team in alignment with the Boldly Striking Strategic Priority 5.1. *Enhance a culture that intentionally fosters building and engaging a high performing workforce and fortifies FAMU’s status as an employer of choice.* We are pleased to announce that four of our dedicated auditors have recently achieved certification in fraud, investigations, and auditing, demonstrating our commitment to staying at the forefront of industry knowledge and enhancing our capabilities to ensure the integrity of our institution's operations.

![Erica Thames](image1.png)  
**Certified Fraud Examiner**  
(July 24, 2023)

![Crisencia Brown](image2.png)  
**Certified Inspector General Investigator**  
(August 18, 2023)

![Rasheedat McKay](image3.png)  
**Certified Inspector General Auditor**  
(August 18, 2023)

![William Thomson](image4.png)  
**Certified Inspector General Investigator**  
(August 18, 2023)

The Division of Audit regularly hosts Power Skills Labs (PSL) to ensure that staff have the skills necessary to perform at a high-level and deliver quality work for the University. PSLs are led by internal and external experts.

<table>
<thead>
<tr>
<th>Power Skills Lab</th>
<th>Date</th>
<th>Instructor</th>
</tr>
</thead>
</table>
| Accountability       | June 29, 2023 | Deidre Melton  
AVP for Audit/CRO  
Florida A&M University |
| Customer Service     | June 29, 2023 | Joseph Maleszewski  
VP for Audit/CAE  
Florida A&M University |
| Audit Sampling       | August 9, 2023| Crisencia Brown  
Auditor and Investigator  
Florida A&M University |
| Internal Controls    | September 6, 2023 | Nancy Shepherd  
Special Projects Coordinator & External Audit Liaison  
Florida Department of Transportation |
Leveraging the Brand

The Division of Audit staff, present at a variety of local, national, and international conferences for professional organizations in order to advance the university's strategic goal of Leveraging the Brand Goal 3.2.2, which aims to highlight faculty, staff, student, and alumni capabilities to elevate their profile for external demand. Their presentations contribute to building a database of experts, promote the university's capabilities, physically showcase experts, and create valuable communication materials for wider dissemination. Since the June 2023 BOT meeting, two audit staff have presented at professional organization events, effectively showing their expertise on the local and national stage.

EVENT: Association of Certified Fraud Examiner – Tallahassee Chapter - July Education Event

Topic: How psychological phenomena, logical fallacies, and narrative devices influence the messages we receive and communicate in interviews, investigations, and everyday life.

Audit staff have been selected to present at the following upcoming conferences.

<table>
<thead>
<tr>
<th>Conference</th>
<th>Organization</th>
<th>Topic</th>
<th>Staff Member</th>
</tr>
</thead>
<tbody>
<tr>
<td>2023 AuditCon</td>
<td>Association of College and University Auditors</td>
<td>Engaging the University Community (Internal Audit Awareness Campaigns)</td>
<td>Trystal Wright, Senior Auditor</td>
</tr>
<tr>
<td>2023 AuditCon</td>
<td>Association of College and University Auditors</td>
<td>Millennials, Gen Z, and Preparing for Gen Alpha: How maintaining an adaptive leadership style can support recruitment and retention of current and future auditors</td>
<td>Deidre Melton, AVP for Audit/CRO</td>
</tr>
<tr>
<td>2023 IGNITE</td>
<td>Institute of Internal Auditors</td>
<td>Generative AI and ChatGPT Risks</td>
<td>Deidre Melton, AVP for Audit/CRO</td>
</tr>
<tr>
<td>November Educational Event</td>
<td>Association of Certified Fraud Examiners – Tallahassee Chapter</td>
<td>Cyber Fraud</td>
<td>William Thomson, Senior IT Auditor</td>
</tr>
</tbody>
</table>
Staff continue to grow and showcase their leadership skills by serving on the boards of local and national organizations. This helps to continue to grow FAMU’s brand as leaders within professional communities. William Knight and William Thomson were both appointed to local professional organization boards this summer.

William Knight
Treasurer
Association of Government Accountants – Tallahassee Chapter

William Thomson
Webmaster
ISACA – Tallahassee Chapter
**ERM Activities**

**ERMAC Risk Managers Committee**

The Risk Managers Sub-Committee, a constituent of the Enterprise Risk Management Advisory Committee (ERMAC), comprises not only representatives from the conventional operational risk domains but also includes delegates from the Office of Compliance and Ethics, Office of Communications, as well as the Office of the Chief Operating Officer, who assume supportive roles within the committee’s framework. The fundamental objective underpinning the existence of this sub-committee revolves around furnishing the University with a comprehensive and methodical approach for identifying, scoring, and mitigating risks and operational inefficiencies.

To this end, the representatives have conducted assessments of the risks germane to their respective areas. These endeavors have culminated in identifying the foremost risks necessitating immediate attention and mitigation. Presenting their findings before the entire committee, each representative has undergone a rigorous review, with subsequent inquiries and commentary from fellow committee members improving the collective understanding of the risks in question and their intricate interplay with other business units.

At this juncture, the committee is engaged in a concerted effort wherein we work individually with each representative to delve deeper into the underlying root causes of the identified risks, consequences, and impacts. We strive to formulate a suite of well-calibrated risk response actions through this meticulous analysis. Each of these actions will be accompanied by stipulated timelines for execution, ensuring a coherent and proactive approach to risk management across the University.

**New Tool: ERM Risk Identification Toolkit**

The [ERM Risk Identification Toolkit](#) is live and ready to help management identify, evaluate, and document potential risks their business unit may face. The tool is located in the Toolbox section of the Enterprise Risk Management web page. The form allows customers to narrow down the needed services, including risk assessment, risk management planning, training and education, incident management, crisis management, strategic planning, budgeting, etc. There are additional prompts to record information specific to the customer’s needs. The ERM team receives the service request by email upon submission of the form.
Opioid Abatement Risk Alert

On June 2, 2023, Governor Ron DeSantis signed HB 783: Opioid Abatement, which takes effect July 1, 2023. This bill creates 1004.0971, Florida Statutes, and details the requirements for Florida College System and State Universities System institutions related to supplying, administering, training, and placing opioid antagonists on campus. The bill expands procurement rules and liability protections for opioid antagonists. FAMU should consider revisions or expansion of policy and procedure, training and awareness, procurement options, and placement of opioid antagonists on campus.

1004.0971, F.S. on Opioid Abatement is a state law in Florida that aims to abate the opioid epidemic and to support the victims of the opioid crisis and their families. The act became effective July 1, 2023, and requires FAMU to:

- **Supply** - Have a supply of emergency opioid antagonists with an auto-injection or intranasal application delivery system in each residence hall or dormitory residence owned or operated by the institution for the administration of emergency opioid antagonists to a person believed to be experiencing an opioid overdose.
- **Placement** - Place the emergency opioid antagonists in a clearly marked location within each residence hall or dormitory residence. The emergency opioid antagonist must be easily accessible to campus law enforcement officers trained in administering emergency opioid antagonists.

It is important to note that the law requires the Florida Board of Governors to create rules and regulations related to section 1004.0971, Florida Statutes.

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**ERM Staffing**

**Student Intern**
We are pleased to announce that we have secured funding from the University Risk Management and Insurance Association (URMIA) for an ERM intern position. This achievement set the stage for a promising chapter as we welcome Jeremiah Fisher, a talented fourth-year Accounting student, to our team. His selection for the coveted college intern position marks the beginning of a partnership with considerable potential.

In this role, Mr. Fisher will strengthen our ERM team, playing a crucial part in identifying, evaluating, and managing the intricate risks woven into FAMU’s operations. His contributions are expected to bring a balanced blend of efficiency and finesse to our ERM operations.

However, this isn’t just an internship; it’s an opportunity to dive into the world of risk management. Through hands-on engagement, Mr. Fisher will develop practical expertise that will serve him well.
Armed with this knowledge, he will be equipped to excel in various professional paths, leaving a mark no matter where his journey takes him.

Part-time Student Workers

We are excited to welcome back a dedicated student who will rejoin our team, bringing valuable experience and insights. Additionally, we are pleased to share that another talented student has expressed a keen interest in collaborating with us during the upcoming fall semester, participating through the esteemed Federal Work-Study Program.

These industrious students will enhance our capabilities, particularly in developing graphic training materials. Among their contributions, they will be instrumental in producing and curating engaging training videos centered around the critical task of risk identification. Their involvement promises to bring a fresh perspective and innovative ideas, enriching our training resources and benefiting our entire organization.

ERM Training and Awareness

Annual HBCU Risk Conference

From June 1-3, 2023, the ERM team participated in the Second Annual HBCU Risk Conference held on the vibrant campus of Texas Southern University. This distinctive conference was all about delving into the specific challenges that HBCUs tackle in compliance, insurance, Title-9, and Risk Management.

The heart of the event was a captivating Table Top Exercise, where participants navigated various risk scenarios, gaining valuable insights into managing disruptions effectively. Breakout sessions added layers of knowledge, covering topics ranging from the basics of enterprise risk management to the intricacies of Brand Management, Continuity Planning, Crisis Communication, Youth Protection, Cyber Liability, and Policy Management.

A highlight of the conference was the session presented by our very own Chief Risk Officer, Deidre Melton. Her talk, “Tips, Tricks, and Lessons Learned of a Successful ERM Implementation,” was a moment of shared wisdom and experience that resonated deeply with attendees.

The conference provided a platform for networking, learning, and collaborative problem-solving, all against the backdrop of the unique challenges HBCUs face. It was an opportunity to gather practical insights, foster connections, and develop a renewed sense of purpose in risk management.
Leadership Roundtable

The Leadership Roundtable Series is designed to give Division of Audit staff an opportunity to meet leaders from around the University and hear what leadership priorities and goals are, as well as how our teams within Audit and/or Enterprise Risk Management can assist you throughout the year. Upcoming roundtable leaders are below.

W. Rebecca Brown
Vice President for Finance and Administration/Chief Financial Officer
October 2023

Dr. Roscoe Hightower
President for United Faculty of Florida -FAMU Chapter
November 2023

Fraud Awareness Week

The Division of Audit plays a pivotal role in safeguarding the financial integrity and reputation of our university. Participating in the November 2023 Fraud Awareness Week holds immense significance, as it offers an opportunity to raise awareness about the potential risks and threats associated with fraudulent activities. By actively engaging in this initiative, the university not only demonstrates its commitment to preventing fraud but also empowers its community with knowledge and tools to identify and address such issues. Your involvement in promoting this event aligns seamlessly with your role and responsibilities, reinforcing the university's dedication to maintaining a culture of honesty, integrity, and ethical conduct.

Power Skills Labs

The Division of Audit is excited to announce a series of Power Skills Labs aimed at enhancing the capabilities and knowledge of our teams in critical areas. Over the next few months, we will be conducting workshops and training sessions in the following domains:
1. **PowerBI:** We recognize the growing importance of data analytics in our operations. These workshops will equip our teams with advanced skills in PowerBI, enabling them to harness data for better decision-making.

2. **Transformational Leadership:** Leadership is key to our success. Our Transformational Leadership sessions will focus on developing leadership qualities that drive positive change, foster innovation, and inspire our teams to excel.

3. **Time Management:** Time is a precious resource. Our Time Management workshops will provide practical strategies to boost productivity, prioritize tasks effectively, and maintain a healthy work-life balance.

4. **Whistleblower Act:** Upholding ethical standards is paramount. These sessions will educate our teams about the Whistleblower Act, ensuring they understand their rights and responsibilities in reporting any wrongdoing.

5. **Flowcharting:** Process efficiency is vital. Our Flowcharting workshops will teach techniques for visualizing and improving processes, contributing to streamlined operations and reduced risks.

These Power Skills Labs underscore our commitment to continuous improvement, professional development, and maintaining the highest standards of excellence within the Division of Audit. We believe that investing in these areas will not only benefit our teams but also enhance our ability to serve the university effectively.

### Internal Audit Professional Standards are Changing

The Division of Audit would like to bring to your attention an upcoming development within the field of internal auditing. The Institute of Internal Auditors (IIA) is planning to introduce changes to its standards that govern our practices and ensure the highest levels of integrity, transparency, and effectiveness.

These updated standards are set to take effect in the near future, and we are committed to providing you with a comprehensive overview of these changes during our December Board of Trustees meeting. This presentation will delve into the specifics of the modifications and their implications for our operations. We believe that these adjustments align with our ongoing efforts to maintain excellence in our internal audit processes and uphold the principles that guide our institution.
Annual Report

03  Performance at a Glance
04  FAMU Fundamentals
05  University Community Insights
07  Compliance and Ethics Week
08  Investigations
11  Ongoing Compliance Work in Research
12  Monitoring
13  Compliance Reviews
14  What's Next

- Organizational Chart and Progress
- Compliance and Equity Focus 2023-2024
- The Compliance Chronicles
- ACTION ITEM: Equity Report
- ACTION ITEM: Annual Report and Program Plan
Performance at a Glance

Rica Calhoun, Chief Compliance and Ethics Officer

The last year has been one of growth and positive momentum for the Office of Compliance and Ethics. Our collective efforts have enabled us to navigate through complexities while promoting a safe and transparent environment where FAMU community members thrive.

This report highlights the multifaceted initiatives undertaken by the Office of Compliance and Ethics in collaboration with various University stakeholders. Our focus remains on fostering a culture that values ethical decision-making, compliance with regulatory requirements, and the continued enhancement of policies and procedures. We highlight compliance and ethics achievements, challenges, and initiatives that have contributed to the growth and success of FAMU. Our dedicated team has been instrumental in fostering a culture of responsibility and fairness.

In the following pages, you will find detailed information on the key areas we have focused on, the impact we’ve made, and our plans for the future. We will also showcase the collaborative efforts that have driven our compliance and ethics programs forward and the stakeholders who have played a significant role in our accomplishments.

As we reflect on the past year, we also look ahead with enthusiasm and dedication to supporting the compliance and ethics program. We are confident that our collective commitment to these principles will continue to enhance the reputation and success of our University.

The entire University community continues to provide their support, engagement, and commitment to our shared mission. Together, we strive to create a culture of compliance, ethics, and inclusivity that sets a standard of excellence in higher education.

We invite you to explore this report and learn more about the vital work of the Office of Compliance and Ethics at FAMU.
One of the core components of an effective compliance and ethics program is training and education. Members of the University community must understand University expectations and the bases for those expectations. FAMU Fundamentals is mandatory for University employees and select student employees.

In our fourth year, FAMU Fundamentals was composed of seven modules:
Cybersecurity
Sexual Harassment Prevention, ADAA, and Title IX
Clery
Compliance and Ethics
Emergency Management
Public Records
Enterprise Risk Management

Communication began in November 2022, with the start of "Compliance and Ethics Week." The training was administered from March 1-31. The core audience was 2,035. Users also received a Resource Library with the University Code of Conduct and links to all policies referenced in the training. This year, completion percentages increased from 2022, from approximately 80% to an average of 87% completion. We continue to evolve and improve the training and have already received feedback for FAMU Fundamentals 2024.

FAMU Fundamentals 2023
This year, we continued to focus on soliciting feedback from members of the University community about compliance and ethics and mandatory training. We administered the "FAMU Fundamentals Post-Training Survey" (April 2023) to help us understand what was working and where we had opportunities for improvement.

Our goal with each administration of FAMU Fundamentals is to evolve with the needs of University employees. Feedback from participants and compliance partners has helped us keep a pulse on what training topics to cover and how we can best present the information.

The post-training feedback survey results indicate that the course received positive feedback from a significant majority of respondents. The following key points were highlighted by the participants:

- **Course Length**: A majority of respondents found the course duration to be appropriate, suggesting that it neither felt too lengthy nor too rushed.

- **Ease of Understanding**: Participants reported that the course content was presented in a clear and comprehensible manner, making it accessible to a wide range of learners.

- **Competency**: The majority of respondents felt that the course effectively enhanced their knowledge and skills in the subject matter.

- **Relevance**: Survey participants noted that the course content was relevant to their roles and responsibilities, which likely contributed to its overall effectiveness.

- **Multimedia**: The incorporation of multimedia elements, such as videos, presentations, or interactive components, was positively received by a significant portion of respondents, enhancing their learning experience.
Post-Training Survey Observations

Course Specific Feedback (participant response of 'yes' to questions in legend below)

<table>
<thead>
<tr>
<th>Course</th>
<th>Course Length OK</th>
<th>Easy to Understand</th>
<th>Competency Achieved</th>
<th>Relevant</th>
<th>Multimedia Helpful</th>
</tr>
</thead>
<tbody>
<tr>
<td>Emergency Management</td>
<td>94%</td>
<td>97%</td>
<td>95%</td>
<td>90%</td>
<td>96%</td>
</tr>
<tr>
<td>Compliance and Ethics</td>
<td>90%</td>
<td>94%</td>
<td>94%</td>
<td>97%</td>
<td>93%</td>
</tr>
<tr>
<td>Cybersecurity</td>
<td>94%</td>
<td>94%</td>
<td>94%</td>
<td>97%</td>
<td>96%</td>
</tr>
<tr>
<td>Sexual Harassment Prevention</td>
<td>93%</td>
<td>97%</td>
<td>95%</td>
<td>95%</td>
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</tr>
<tr>
<td>Clery</td>
<td>95%</td>
<td>95%</td>
<td>96%</td>
<td>94%</td>
<td>96%</td>
</tr>
<tr>
<td>Public Records</td>
<td>85%</td>
<td>87%</td>
<td>87%</td>
<td>89%</td>
<td>88%</td>
</tr>
<tr>
<td>Enterprise Risk Management</td>
<td>80%</td>
<td>90%</td>
<td>89%</td>
<td>88%</td>
<td>92%</td>
</tr>
</tbody>
</table>

Enhancement Strategies for 2023

Manager Support
Additional guidance for managers to facilitate training in their units

Accountability
Accountability measures through performance platforms and access restrictions

Employee Support
Increased outreach for feedback and support for constituencies that have access challenges

Incentives
Recognition and incentives throughout training period
OCE hosts FAMU’s annual Compliance and Ethics Week every November. This year’s theme, "FAMUly Matters" focused on the shared responsibility for the success of the compliance and ethics program at the University. University Compliance Partners in the Enterprise Compliance Committee received special recognition. OCE focused on outreach and positive incentives throughout the week with appearances from AVP’s Ella Kiselyuk and Deidre Melton. FAMU’s Compliance and Ethics Week is an extension of our ongoing commitment to the University’s compliance and ethics program. Stakeholders receive an electronic copy of the University’s Code of Conduct and the OCE Welcome Packet.
Investigations constitute another piece of the compliance structure, providing reinforcement of University expectations and accountability. The enhanced Compliance and Ethics Hotline allows us to examine trends from complaints received. OCE also coordinates meetings of the Triage Team, which includes members from the Office of Equal Opportunity Programs, the Division of Audit, and the Office of General Counsel. The Triage Team meets regularly to discuss reports, investigations, and referrals to ensure that we are appropriately addressing concerns. In 2022-2023, we received slightly less complaints, with 59 reports. We did not have an increase in substantiated allegations, which indicates that reporting avenues are readily accessible and used. It also corresponds with our previous survey feedback that participants were knowledgeable about where to report their concerns and felt comfortable reporting.

Currently, 32 cases are closed and 27 are in progress.
There is some consistency in the common issues reported to enforcement offices* between 2021-2022 and 2022-2023. The top issues include:

- Employee Misconduct
- General Concerns
- Accounting and Auditing
- Conflict of Interest
- Fraud
- Discrimination and Harassment

These issues will be areas of focus in the coming year as we work with compliance partners to examine policies, processes, and regulatory requirements. We continue to provide trainings and increased communication educating members of the University community about reporting and the investigative process.

With the upgraded hotline platform, we will continue enhancing the use of analytics to inform our training and monitoring efforts throughout the University.

* Office of Compliance and Ethics; Equal Opportunity Programs, Division of Audit; and the Office of Human Resources
Over the past year, OCE has supported the University’s efforts in upholding high standards of research integrity and compliance. In the dynamic landscape of academia and research, OCE works with compliance partners, like the Divisions of Research and Academic Affairs to ensure that research activities conducted under FAMU’s purview adhere to legal, regulatory, and ethical frameworks. In 2023-2024, OCE will continue supporting this compliance area through monitoring of the Foreign Influence screening, travel, and gift processes; automation and process streamlining for data collection, and grant compliance. Some key highlights of our compliance efforts in research for this period include:

**Compliance Review: Tech Transfer and Export Control**

**Policy Development: Enterprise Compliance Committee Working Group developed University Policy: Limited English Proficiency**

**Compliance Memo: Conflicts of Interest in Research**

**Policy Development: Enterprise Compliance Committee Working Group developed University Policy: International Travel**

**Foreign Gift Reporting to BOG (July and January); Coordinated with the Office of Financial Aid and other compliance partners to report foreign gifts to the US Department of Education**
Monitoring is a cornerstone of the internal control structure, to ensure that the policies and risk mitigation processes in place are actually working. In 2022-2023, high-risk monitoring was implemented through the OCE and the Enterprise Compliance Committee's compliance partners. Areas monitored are below:

<table>
<thead>
<tr>
<th>ATHLETICS</th>
<th>COMPLIANCE AND ETHICS HOTLINE</th>
<th>MMERI</th>
</tr>
</thead>
<tbody>
<tr>
<td>Coordination with the Associate Athletic Director of Compliance to monitor and address risk areas:</td>
<td>Managing the compliance and ethics hotline for appropriate investigation or referral to triage partners</td>
<td>Served on the MMERI taskforce to provide assistance and guidance regarding program compliance.</td>
</tr>
<tr>
<td>Eligibility</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Academic Progress Rate</td>
<td></td>
<td></td>
</tr>
<tr>
<td>NCAA Infractions Report Monitoring</td>
<td></td>
<td></td>
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<tr>
<td>Athletics Action Plan</td>
<td></td>
<td></td>
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<tr>
<td>Compliance External Review and Report</td>
<td></td>
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</tbody>
</table>

<table>
<thead>
<tr>
<th>RESEARCH</th>
<th>GOVERNANCE</th>
</tr>
</thead>
<tbody>
<tr>
<td>Policy and process updates regarding foreign influence screening, travel, and gift reporting</td>
<td>Originated on-demand compliance training for the BOT</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>PRIVACY</th>
<th>CAMPUS SAFETY</th>
</tr>
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<tbody>
<tr>
<td>Advised University leadership regarding best practices related to the establishment of a University Privacy Program; continued implementation monitoring</td>
<td>Supports the Division of Student Affairs through the establishment of the Behavioral Threat Assessment Team to identify and mitigate acute behavioral concerns.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>ENTERPRISE COMPLIANCE COMMITTEE</th>
</tr>
</thead>
<tbody>
<tr>
<td>Enterprise Compliance Committee Meetings: 2022–2023: October, February, May</td>
</tr>
<tr>
<td>Working Group Meetings scheduled by compliance partner chairs</td>
</tr>
</tbody>
</table>
Compliance Reviews

Compliance Reviews are integral to assess our current processes, identify gaps, and ensure that policies and procedures are being followed. OCE assists compliance partners by providing resources to help them identify and mitigate risk in their areas. OCE also completes monitoring to provide additional support and guidance. This year, the Office of Compliance and Ethics conducted advisory services in the following areas:

<table>
<thead>
<tr>
<th>Research: Export Control/Tech Transfer</th>
<th>Interdepartmental: Foreign Influence Travel Reporting</th>
</tr>
</thead>
<tbody>
<tr>
<td>Faculty Senate: Membership Parameters</td>
<td>Athletics: Sport Specific Improvement Plan Progress</td>
</tr>
<tr>
<td>Research: Foreign Travel</td>
<td>Research: Grant Compliance</td>
</tr>
<tr>
<td>Athletics: Athletics Plan</td>
<td>Interdepartmental: USDA Compliance Visit and Mock Visit</td>
</tr>
<tr>
<td>Interdepartmental: Conflict of Interest</td>
<td>Athletics: External Compliance Progress Report</td>
</tr>
</tbody>
</table>
What's Next?
Organizational Chart
Compliance and Equity Focus
2023-2024
2023-2024 Areas of Focus

**Strategic Priority Areas**

1. Student Success (SP #1)
2. Academic Excellence (SP #2)
3. Leverage the Brand (SP #3)
4. Long-Term Fiscal Health and Sustainability (SP #4)
5. Organizational Effectiveness and Transformation (SP #5)

**Athletics Compliance Focus (Supported Strategic Priorities Identified)**

1. Improved communication between colleges/departments and Registrar and Athletic Certification (SP #1 and 5)
2. Enhancing grant-in-aid process (SP#1 and 5)
3. Evolving the Comprehensive Rules Education Program (SP #5)

Strategies for effectiveness measurement:
- increased efficiency measures,
- stakeholder feedback, and
- increased points of engagement targeting different learning styles

**Equal Opportunity Programs Focus (Supported Strategic Priorities Identified)**

1. Policies and Procedures (SP #1, #5)
2. Training and Awareness Programs (SP #2, #3, #5)
3. Professional Development (SP #1, #5)

Strategies for effectiveness measurement:
- stakeholder feedback,
- increased professional development opportunities,
- policy development and revision, and
- increased follow up and monitoring
The Compliance Chronicles
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<th>Page</th>
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<td>What's New in OCE?</td>
<td>4</td>
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<td>What's New in Equal Opportunity Programs?</td>
<td>6</td>
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<td>What's New in Athletics Compliance?</td>
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<td>Compliance in Focus: Trending Topics</td>
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<td>Compliance Spotlight: Property Records</td>
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<tr>
<td>See Something, Say Something Award</td>
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<tr>
<td>Ask Compliance</td>
<td>12</td>
</tr>
<tr>
<td>Meet the Expanded Compliance and Ethics Team!</td>
<td>13</td>
</tr>
</tbody>
</table>
Greetings Rattlers,
I am so pleased to present the latest edition of Compliance Chronicles. This newsletter serves as a platform to keep you informed about the work we are doing to promote a culture of compliance and ethical decision-making across FAMU.

Over the past quarter, we continue to facilitate the highest standards of integrity, transparency, and accountability through investigations, monitoring, and supporting compliance partners. Working together as a University community, our dedication to compliance and ethics strengthens our University's reputation and reinforces the trust our community places in us.

One of the most exciting developments this quarter has been the expansion of the Office of Compliance and Ethics. I am pleased to announce that the Office of Compliance and Ethics now includes the Office of Equal Opportunity Programs and Athletics Compliance, which has largely established its team. This integration fosters collaboration and strengthens our efforts to promote equity and maintain compliance and ethics in all aspects of University life.

As the Office of Compliance and Ethics grows, we continually enhance our compliance programs and initiatives to align with our University’s strategic plan and the evolving regulatory landscape. Our talented team of professionals remains steadfast in their pursuit of excellence, working diligently to implement robust compliance practices and training programs that empower every member of our University community to commit to a culture of compliance.

In this issue, you will find updates on recent compliance initiatives, tips for fostering a compliant and ethical work environment, and inspiring stories of how our University community members have demonstrated outstanding commitment to compliance and ethical conduct. We encourage you to explore and engage with the valuable resources we have curated for you.

I extend my heartfelt appreciation to all faculty, staff, and students who have contributed to our collective success in promoting a culture of compliance and ethics. Your dedication and cooperation are instrumental in pushing the needle forward as we continue to “March Toward the Top 100.” Thank you for your continued support, and I hope you find this newsletter both informative and inspiring.

Best,
Rica Calhoun
"Whenever you do a thing, act as if all the world were watching."

Thomas Jefferson - (Third President of the United States)

**RECENT NEWS**

**Post-Training Feedback**

In our last newsletter, we celebrated the completion of FAMU Fundamentals. Here are some highlights from your feedback. The overwhelming majority of respondents:

- Felt competent and confident at the end of the course
- Believed the training was relevant
- Found the training easy to understand
- Appreciated the multimedia approach

New topics will include a focus on privacy in the next year!

June 2023: Division of Audit's staff retreat on Professional Strengths & Weaknesses

July 2023: FL TRIO Summer Leadership Service-Learning Project on tackling compliance challenges while avoiding risks.
The Annual Disclosure Form for Conflict of Interest, Commitment, and Significant Financial Interest is due July 1 of each year or within 14 (fourteen) days of beginning outside activities in which you utilize the knowledge, skills, and abilities you use at FAMU. This form can be found in the Human Resources module of iRattler (self service). Please remember to complete the form to remain compliant with University regulations.

For those engaged in research: We have streamlined the disclosure form in iRattler to allow for reporting of outside activities and significant financial interests. Pursuant to Section 1012.977(3), Florida Statutes, an employee who has failed to disclose any outside activity or financial interest as required by BOT Regulation 2005-14 shall be suspended without pay pending the outcome of an investigation which shall not exceed 60 days.

Covered employees are also responsible for disclosure to the Florida Commission on Ethics by July 1 of each year. You will be notified if you are one of these individuals.

The Offices of Compliance and Ethics, Equal Opportunity Programs, and Athletics Compliance came together to hold the Compliance and Equity Retreat on July 14-15th. Dr. Genyne Boston served as our keynote speaker. The team collaborated to identify goals and develop action plans for achieving the University’s strategic priorities for the upcoming academic year.
The Office of Equal Opportunity Programs celebrated the 50th Anniversary of Title IX. This celebration extends the University’s ongoing effort to educate the campus community of Title IX’s movement in combating sexual assault and sexual violence within educational settings. The Office of Equal Opportunity Programs/Title IX consists of a dedicated team with a mission to establish and maintain a safe living, learning and working environment for students, faculty, and staff through prevention, education, and awareness.

**Title IX**

The Office of Equal Opportunity Programs (EOP) initiated an ambitious campaign to cultivate inclusivity and awareness on campus. Through 200 in-person presentations to students and employees, the office has been dedicated to educating the campus community on the principles of equal opportunity. This campaign seeks to foster an inclusive environment and raise awareness about the importance of equal opportunities for all, understanding biases, and promoting respect.

**Title IX cont.**

Common Title IX violations include:

- Sex Discrimination in Sports
- Sex Discrimination in Educational Programs
- LGBTQIA+ Discrimination
- Sexual Harassment
- On-Campus Sexual Assault
- Domestic Violence
- Stalking
- Quid Pro Quo
- Hostile Environment

Any individual can report Title IX related matters. Individuals can report in person, telephone, or email to titleix@famu.edu.
WHAT'S NEW WITH ATHLETICS COMPLIANCE?

We are thrilled to share that the Athletics Compliance office recently participated in the NCAA Regional Rules conference in Indianapolis, Indiana, and the 2023 NACDA convention where they were able to learn and discuss NCAA rules, policies, and procedures, share best practices, and connect with peers.

With the upcoming academic year just around the corner, we eagerly anticipate the commencement of our sports programs. Mark your calendars as our Football team’s reporting date for their fall camp is August 2nd, 2023 while the Volleyball team will begin preparations on August 7th, 2023. With our Spring eligibility certification exercise and notices completed in May, the compliance team is working with athletics academics to follow-up with student-athletes and coaches now that grades are posted for the last summer term.

We’re excited and gearing up for an exciting and successful season ahead!
**COMPLIANCE IN FOCUS**

This section shares trending topics in the world of compliance and ethics in higher education.

---

**Fraud & Ethics Related Events**

**Jul 24: Bribery Sentence:**
A former dean at the University of Southern California was sentenced to 18 months’ home confinement for bribing a county official in exchange for contracts with the university’s social work school. The dean, 84, was also ordered to pay a $150,000 fine at her sentencing hearing Monday morning in downtown Los Angeles. The dean pleaded guilty last year to helping a veteran politician -- who served on the LA County Board of Supervisors at the time -- funnel $100,000 from his campaign account, through the USC school, to a nonprofit run by his son. [link](#)

**Jul 20: Research Fraud:**
The president of Stanford University has resigned after an investigation opened by the board of trustees found several academic reports he authored contained manipulated data. Marc Tessier-Lavigne, who has spent seven years as president, authored 12 reports that contained falsified information, including lab panels that had been stitched together, panel backgrounds that were digitally altered and blot results taken from other research papers. He was the principal author on five of the reports, and a co-author on seven. [link](#)

**Jul 19: Conflict of Interest:**
In June 2020, a biopharmaceutical company called BridgeBio Pharma issued a routine press release. It was entering into a collaboration agreement with the Johns Hopkins University to “invest heavily in programs to accelerate promising genetic-disease therapies,” among other things. Left unmentioned in the release were the tight ties between the company’s upper leadership and that of Johns Hopkins. Four months before that release was issued, BridgeBio sent out another release and filed a notice with the Securities and Exchange Commission: It was adding Ronald J. Daniels, the university’s president, to its board. With that post came a $50,000 a year retainer and stock options worth about $1.2 million, according to SEC documents. [link](#)

**Jul 06: Grant Fraud:**
A University of Oklahoma professor and his wife were recently sentenced to federal prison. The couple, both 60, were sentenced to serve more than three years collectively and ordered to pay $2.1 million in restitution. The two had been accused of making false statements involving a Department of Energy grant. Authorities said the pair had formed and controlled a company called MicroChem Solutions. Through that company, they applied for and received federal grand monies from the Small Business Technology Transfer Program of the Department of Energy. However, authorities said the pair spent grant money on unrelated matters, including personal expenses. They also allegedly made false statements and submitted altered documents to the Department of Energy regarding how they spent grant money. [link](#)

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*Source: University of Auburn’s Office of Audit, Compliance & Privacy*
COMPLIANCE IN FOCUS - CONT.

Jul 25: Employee Conduct:
A former Columbia University gynecologist accused by the wife of former Democratic presidential candidate Andrew Yang and others of sexual assault was sentenced Tuesday to 20 years in prison after his conviction earlier this year on federal sexual abuse charges. The man was convicted in January of four counts of enticing and inducing individuals to travel interstate to engage in illegal sexual activity -- each of which carried a maximum possible sentence of 20 years in prison, the US Attorney’s Office for the Southern District of New York previously said. (link)

Jul 26: Greek Hazing:
A fraternity's interim suspension at Clemson University is now an official four-year ban after an investigation determined members were responsible for hazing. Earlier this year, the school’s chapter of Alpha Gamma Rho was accused of forcing students into personal servitude and giving them chemical burns, according to a letter from Clemson. According to university documents, an independent probe confirmed the allegations and revealed instances of line-ups, ice baths, and bodily harm toward a new member. Now, the group is barred from campus until 2027. (link)

Jul 25: NCAA Compliance:
Michigan head coach Jim Harbaugh and the NCAA are working toward a negotiated resolution that is expected to see him suspended four games this season in penalties stemming from alleged false statements he originally made to investigators, sources tell Yahoo Sports. The agreement is an initial version of the negotiated resolution and is not yet finalized. The resolution must now be approved by the NCAA Committee on Infractions, which could take several days if not weeks. The committee has the authority to adjust penalties. (link)

Jul 10: Retaliation Lawsuit:
A second lawsuit alleges that administrators at Lake Superior College retaliated against an employee who voiced concerns about a welding byproduct. Vaughn Johnson, a longtime maintenance worker at the college, claimed in a July 7 lawsuit that the college had violated the state’s “whistleblower” act and its occupational safety act. He claims he was disciplined and threatened with termination after telling managers there that filtration and ventilation systems at the school’s Downtown Duluth Center hadn’t been kept up, and a pair of employees who had tried to service it weren’t provided proper safety equipment. (link)
We are delighted to introduce two exceptional local high school students, Makinzy and Chloe, who have spent their summer as interns in our University's Office of Compliance and Ethics. These young ladies came to us through their participation in the Tallahassee Future Leaders' Academy. Throughout their internship, they demonstrated remarkable enthusiasm, dedication, and a genuine interest in learning about compliance and ethics here at FAMU. As they've completed their internship, we are confident that Makinzy and Chloe have a bright future, and we are grateful for their positive impact during their time with us.
The Compliance Spotlight highlights various departments across campus that are excelling in their compliance efforts. In this issue, we highlight the Office of Property Records!

Welcome to our "Ask Compliance" section of the newsletter, where we invite members of the campus community to submit their questions and concerns related to compliance and ethics.

We believe that an open and transparent dialogue is essential to maintaining a strong culture of compliance. We encourage all members of our community to reach out with any questions or concerns they may have by sending an email to oce@famu.edu.

Whether you have a question about a particular policy or procedure, or you are unsure about the ethical implications of a particular situation, our team is here to help. We believe that by working together, we can ensure that our campus community remains a place where ethical behavior is not just encouraged but expected.

So please, don't hesitate to reach out with any questions or concerns you may have. We look forward to hearing from you soon.

Do you know a FAMU employee who has demonstrated a commitment to compliance and integrity?

We believe that ethical behavior starts with individuals who are willing to take a stand when they see something that doesn't align with our values, even when it is difficult or uncomfortable to do so.

We want to celebrate the employees who exemplify a dedicated commitment to integrity and ethics.

Let us know by nominating them for the See Something, Say Something Award at oce@famu.edu and be on the lookout for a feature in our next issue!
Meet the University Compliance (OCE) Team

**RICA CALHOUN**  
Chief Compliance & Ethics Officer  
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**LA’TONYA BAKER**  
Director of Compliance, Chief Privacy Officer  
latonya.baker@famu.edu

**EDNA GASQUE**  
Program Manager  
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**MIRANDA LEVY**  
Coordinator  
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For inquiries, contact us.
famu.edu/administration/compliance-and-ethics/  
oce@famu.edu  
850 599 8305
Meet the University Equal Opportunity Programs (EOP) Team

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Director, EOP and Labor Relations/Title IX
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Assistant Director
Equal Opportunity Programs
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LETITIA MCCLELLAN
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Equal Opportunity Programs
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MONTELL HOLMES
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850 599 3076
Meet the University Athletics Compliance Team

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Sr. Associate Athletic Director
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**LORI GOODART**
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Financial Air & Benefits
lori.goodart@famu.edu

**KELLEY BICKHAM**
Associate AD
Eligibility and Compliance
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**JERRY GOODSON**
Athletic Compliance Coordinator
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**TIA HUIE**
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Athletic Compliance Front Office Graduate Assistant
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aco@famu.edu
850 599 8303
ACTION ITEM: Equity Report
**ACTION ITEM: Equity Report**

Board of Governor's Regulation 2.003(5) Equity and Access, requires that Universities prepare an annual Florida Equity Report, inclusive of required elements established by the Board of Governors. The report must be reviewed and approved by the Board of Trustees and submitted to the Board of Governors Office by September 30th of each year.

FAMU's Equity Report highlights the University's commitment to creating a welcoming environment for students, employment, and athletics.

The Office of Equal Opportunity Programs coordinated with several University offices, including the Division of Strategic Planning, Analysis, and Institutional Effectiveness, to collect the necessary data and compile the report. The report was reviewed by the Office of Compliance and Ethics and sent for review to the President's Leadership Team before completing the final draft.

We recommend that the Board approve the Equity Report for submission to the Board of Governors' pursuant to the regulation.

**ACTION ITEM: Annual Report and Program Plan**

This annual report and the program plan maps out goals for each needed element of an effective compliance and ethics.

Highlights include an increased focus in high risk compliance areas, training, investigations, and monitoring.

We recommend that the Board approve the annual report and program plan pursuant to Board of Governors' regulation 4.003.
<table>
<thead>
<tr>
<th>Institution</th>
<th>Florida A&amp;M University</th>
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<tbody>
<tr>
<td>Data Year</td>
<td>July 2021 - June 2022</td>
</tr>
<tr>
<td>Report submitted by (name, title, contact information)</td>
<td>Latrecha K. Scott, Ph.D.</td>
</tr>
<tr>
<td></td>
<td>Director, Equal Opportunity Programs &amp; Labor Relations/Title IX Florida A&amp;M University 1700 Lee Hall Drive, Suite 308 FHAC Tallahassee, FL 32307</td>
</tr>
<tr>
<td>Report approved by the university's board of trustees or its designee (name, title, contact information, and date approved)</td>
<td></td>
</tr>
<tr>
<td>Complete each tab, as applicable.</td>
<td></td>
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<tr>
<td>Due</td>
<td>September 30, 2023</td>
</tr>
</tbody>
</table>
## Non-Discrimination Policy

Provide the web citation of the university's non-discrimination policy adopted by the university board of trustees.

Describe the institution’s progress in implementing strategic initiatives & performance related to equity & access as they pertain to academic services, programs, & student enrollment; equity in athletics; & employment.

1. Academic Services and Programs
   - During the year one of the University’s strategic plan implementation, processes were developed through the work of an “academic program prioritization study” and “value sprints” to build a shortlist of new or existing FAMU programs for possible online growth. A list of potentially new or existing FAMU programs for online expansion have been created. In addition, a program demand gap analysis was conducted in year one. The study yielded recommendations of programs based on supply and demand for doctoral-level programs. At least 25 programs have been identified for potential expansion. An additional shortlist of programs was also identified for possible expansion and were ranked from most favorable to least favorable.
   - The University continues to prioritize the use of academic advising to support student success. The transition to more intrusive advising with specialized advising teams has improved overall operations in terms of assisting students in planning and shaping their undergraduate experience. Additionally, the University’s Gather Learning and Library Learning Centers have extended their hours into the weekends to help students with math, science, and English courses. Weekend review sessions are now available to help students prepare for exams in various math and science courses. Academic coaches have partnered with University Housing to coach and tutor students living on campus.
   - The Division of Academic Affairs also established the Transfer Academic Success Program to assist transfer students in making a successful transition to the University, both academically and personally. The program provides support services to transfer students such as peer mentoring, workshops, resources, activities, and events. Students can also get leadership and networking experience through transfer student organizations such as the Transfer Student Association, Tau Sigma National Honor Society, and Transfer Ambassadors. Lastly, to promote a smooth transfer procedure for students, the institution has expanded its focus on developing transfer articulation agreements and revising curriculum maps. This has resulted in new community college alliances and enhanced interaction with graduate and undergraduate feeder schools. The FAMU Ignite Transfer Program offers curriculum pathways to assist Florida State and community college students in earning a bachelor’s degree in four years.
   - The university is expanding co-curricular activities, services, and initiatives to enrich the student experience. Since the start of the academic year, the Office of International Education and Development (OIED) has hosted 34 events, including classroom presentations, informational sessions, and workshops, as well as two study abroad fairs, reaching over 1,600 students. The Strike Forward program collaborates with departments to develop co-curricular pathways for students that are focused on employer and industry demands. As part of the program, five academic units have built co-curricular pathways for select degree programs.

2. Student Enrollment
   - The University’s student enrollment numbers continue to increase in the areas of First Time In College (62%) and transfer students (66%). In alignment with strategic priorities, the University continues to recruit and provide services, as noted above, aimed at retention and student success.

3. Equity in Athletics
   - Equity in Resource Allocation: To ensure equitable access to resources for all student-athletes, Athletics continuously reviews resource allocation within the Department. Athletics prioritized funding for programs that directly supported the success of student-athletes, including academic scholarships and travel grants for academic-related conferences. By aligning resource allocation with the goal of enhancing the student experience, the University aims to reduce disparities and promote equity among our student-athletes.
   - Equity in the Student Experience: Recognizing the vital role academic support plays in student-athletes’ overall success, the Athletics Department expanded and improved academic support services during the 2021-2022 academic year. Athletics worked collaboratively with the academic advising and tutoring departments to ensure that student-athletes received tailored support based on their individual needs. This included personalized study plans, workshops, and access to subject-specific tutoring. Additionally, academic advisors worked closely with the Athletics Department to monitor student-athletes’ academic progress and provide intervention when needed.
   - Equity in Resource Allocation: To ensure equitable access to resources for all student-athletes, Athletics continuously reviews resource allocation within the Department. Athletics prioritized funding for programs that directly supported the success of student-athletes, including academic scholarships and travel grants for academic-related conferences. By aligning resource allocation with the goal of enhancing the student experience, the University aims to reduce disparities and promote equity among our student-athletes.

4. Employment
   - Professional Development: Our University has invested in professional development programs that empower employees to excel in their careers. This includes mentorship opportunities, leadership training, and workshops that foster a culture of continuous learning and growth, specifically in the areas of civil discourse.
   - Pay Equity: The University has initiated a comprehensive review of compensation structures to ensure that employees are fairly compensated regardless of gender, race, or other factors.

Data-Driven Approach: Our commitment to transparency is evident in our data collection and reporting practices. We consistently monitor and analyze workforce demographics, turnover rates, and promotion trends to identify areas for improvement and track our progress over time.
### Areas of Improvement Pertaining to Academic Services, Programs, & Student Enrollment

<table>
<thead>
<tr>
<th>Improvement Area</th>
<th>Fall 2020</th>
<th>Fall 2021</th>
<th>Improvement %</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total number of Whites in EAM</td>
<td>23</td>
<td>14</td>
<td>-39%</td>
</tr>
<tr>
<td>Total number of Native Hawaiian or Other Pacific Islanders in EAM</td>
<td>0</td>
<td>0</td>
<td>0%</td>
</tr>
<tr>
<td>Total number of American Indian or Alaskan Native in EAM</td>
<td>0</td>
<td>0</td>
<td>0%</td>
</tr>
<tr>
<td>Total number of Asians in EAM</td>
<td>6</td>
<td>4</td>
<td>-33%</td>
</tr>
<tr>
<td>Male Administrators in EAM</td>
<td>109</td>
<td>103</td>
<td>-6%</td>
</tr>
<tr>
<td>Total non-tenured Native Hawaiian/Other Pacific Islanders faculty in EAM</td>
<td>0</td>
<td>0</td>
<td>0%</td>
</tr>
<tr>
<td>Total tenure-track earning Asian faculty in EAM</td>
<td>17</td>
<td>10</td>
<td>-41%</td>
</tr>
<tr>
<td>Total tenure-track earning Black faculty in EAM</td>
<td>22</td>
<td>17</td>
<td>-22%</td>
</tr>
<tr>
<td>Total tenure-track earning female faculty in EAM</td>
<td>55</td>
<td>42</td>
<td>-23%</td>
</tr>
<tr>
<td>Total number of First Professional Degrees awarded in EAM</td>
<td>17</td>
<td>15</td>
<td>-12%</td>
</tr>
<tr>
<td>Total number of Bachelor's degrees awarded to Asian students in EAM</td>
<td>8</td>
<td>7</td>
<td>-12%</td>
</tr>
<tr>
<td>Total number of Bachelor's degrees awarded to White students in EAM</td>
<td>48</td>
<td>42</td>
<td>-13%</td>
</tr>
<tr>
<td>Total number of Doctoral degrees awarded to White students in EAM</td>
<td>101</td>
<td>90</td>
<td>-11%</td>
</tr>
<tr>
<td>Graduation Rate of full-time FTIC students entering Fall 2016 after six years (2020)</td>
<td>54.55%</td>
<td>55.25%</td>
<td>1.2%</td>
</tr>
<tr>
<td>Retention of full-time FTIC students entering Fall 2018 and continuing after one year was 54.05%</td>
<td>54.05%</td>
<td>54.05%</td>
<td>0%</td>
</tr>
</tbody>
</table>

### Achievement Report for Areas of Improvement Pertaining to Academic Services, Programs, & Student Enrollment

<table>
<thead>
<tr>
<th>Improvement Area</th>
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</tr>
</tbody>
</table>

### Areas of Improvement Pertaining to Gender Equity in Athletics

- 66.45% of student-athletes were female.
- There are ongoing improvements to women's athletic facilities. There is a new women's locker room space for the women's track and field program. The university provided locker room space for the women's basketball and women's volleyball teams.
- 35% of student-athletes were female.
- There are ongoing improvements to women's athletic facilities.

### Achievement Report for Areas of Improvement Pertaining to Gender Equity in Athletics

<table>
<thead>
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<td>54.05%</td>
<td>0%</td>
</tr>
</tbody>
</table>
Provide a detailed budget plan to support attainment of the university’s goals as outlined in its equity plan in accordance with state & federal law. In addition to funded totals, list detailed line items/expenditures & any unmet need(s) that exist.

**Budget Plan 2022**

<table>
<thead>
<tr>
<th>DEPT TITLE</th>
<th>DEPT TITLE</th>
<th>DEPT TITLE</th>
<th>DEPT TITLE</th>
<th>DEPT TITLE</th>
</tr>
</thead>
<tbody>
<tr>
<td>$50,000.00</td>
<td>$119,500.00</td>
<td>$21,000.00</td>
<td>$76,654.00</td>
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</tr>
<tr>
<td>Total Undergraduate Enrollment % Males</td>
<td>Total Undergraduate Enrollment % Females</td>
<td>Participating in Athletics % Males</td>
<td>Participating in Athletics % Females</td>
<td></td>
</tr>
<tr>
<td>--------------------------------------</td>
<td>----------------------------------------</td>
<td>----------------------------------</td>
<td>----------------------------------</td>
<td></td>
</tr>
<tr>
<td>33.5%</td>
<td>66.5%</td>
<td>3.1%</td>
<td>1.4%</td>
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</tbody>
</table>
The University had 14 sport offerings in 2021-2022: Men's sports: baseball, basketball, football, golf, and track (indoor & outdoor). Women's sports: basketball, bowling, cross-country, softball, tennis, track (indoor & outdoor), and volleyball.

The university will consider the feasibility of adding additional women's sports. The university will focus on the interest and abilities of undergraduate females within intramural sports. The university will review results of a study on adding women's golf and women's soccer.

The university will continue to have high participation from female student athletes, who comprised more than 60% of all athletics participation. The university will focus on the interest and abilities of undergraduate females within intramural sports. The department will review results of a study on adding women's golf and women's soccer.

The university provided locker room space for the women's track and field program. The gymnasium floor in Gaither gym was replaced in support of women's volleyball and women's basketball. The university would like to improve the appearance and functionality of the locker room space, and add laundry facilities for women's sports. The university will pursue funding to provide laundry facilities located near Gaither and the Lua Bartley building.

The university continues to fully fund scholarships in all sports. However, coaches had the flexibility of awarding partial scholarships. The university will continue to fund raise and collaborate with key stakeholders internally and externally to increase funding in this area for student athletes who will attend summer school. The university will need to develop/enhance a sustainable model designed to ensure scholarships for school year to include summer school are available to student athletes.

The university's department of human resources is currently conducting salary surveys for personnel. The department has data from the survey, we will benchmark against peer institutions. The department leadership will evaluate the data and make recommendations for the appropriate adjustments.

$13,876

A female was head coach of seven (7) of 14 sports. By the end of the 2022 fiscal year a female was head coach of four of the 14 sports. The department will continue to strive for parity in coaching staff for both men and women sports. The department will assess current staffing level for each sport and make recommendations for the upcoming fiscal year.

The publicity and promotion of the department's programs during the 2021-2022 school year was very diverse and covered both men and women sports. The department would like to enhance and improve marketing, coverage, and publicity for smaller sports. The department will increase the sports information staff which will result in additional coverage, promotion and publicity of the smaller sports.

Sex Equity in Intercollegiate Athletics

<table>
<thead>
<tr>
<th>Element Assessment of Equity Plan</th>
<th>Area for Improvement</th>
<th>Plan for Improvement</th>
</tr>
</thead>
<tbody>
<tr>
<td>Sports offerings</td>
<td>14 sport offerings in 2021-2022: Men's sports: baseball, basketball, football, golf, and track (indoor &amp; outdoor). Women's sports: basketball, bowling, cross-country, softball, tennis, track (indoor &amp; outdoor), and volleyball.</td>
<td>The university will assess the feasibility of adding additional women's sports.</td>
</tr>
<tr>
<td>Participation rates, male &amp; female, compared with full-time undergraduate enrollment</td>
<td>The University continues to have high participation from female student athletes, who comprised more than 60% of all athletics participation.</td>
<td>The University will continue to focus on the interest and abilities of undergraduate females within intramural sports.</td>
</tr>
<tr>
<td>Availability of facilities</td>
<td>The university provided locker room space for the women's track and field program. The gymnasium floor in Gaither gym was replaced in support of women's volleyball and women's basketball.</td>
<td>The university would like to improve the appearance and functionality of the locker room space, and add laundry facilities for women's sports.</td>
</tr>
<tr>
<td>Scholarship offerings</td>
<td>The university continues to fully fund scholarships in all sports. However, coaches had the flexibility of awarding partial scholarships.</td>
<td>The university will continue to fund raise and collaborate with key stakeholders internally and externally to increase funding in this area for student athletes who will attend summer school.</td>
</tr>
<tr>
<td>Funds allocated for:</td>
<td>Administration: The university's department of human resources is currently conducting salary surveys for personnel. The department has data from the survey, we will benchmark against peer institutions.</td>
<td>The department will review results of a study on adding women's golf and women's soccer.</td>
</tr>
<tr>
<td></td>
<td>Recruitment: $13,876</td>
<td>The department will work with coaches to develop a recruit plan for each sport.</td>
</tr>
<tr>
<td></td>
<td>Comparable Coaching: A female was head coach of seven (7) of 14 sports. By the end of the 2022 fiscal year a female was head coach of four of the 14 sports.</td>
<td>The department will continue to strive for parity in coaching staff for both men and women sports.</td>
</tr>
<tr>
<td></td>
<td>Publicity &amp; Promotion: The publicity and promotion of the department's programs during the 2021-2022 school year was very diverse and covered both men and women sports.</td>
<td>The department would like to enhance and improve marketing, coverage, and publicity for smaller sports.</td>
</tr>
<tr>
<td></td>
<td>Other Support Costs: N/A</td>
<td>N/A</td>
</tr>
<tr>
<td>Compliance</td>
<td></td>
<td></td>
</tr>
<tr>
<td>----------------------------------</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Is the university in compliance with all applicable state laws in providing equal opportunity &amp; access to students to participate in intercollegiate athletics, as well as in intramural, club, or recreational athletics?</td>
<td>Explain any areas of noncompliance with state laws.</td>
<td></td>
</tr>
<tr>
<td>Is the university in compliance with all applicable federal laws in providing equal opportunity &amp; access to students to participate in intercollegiate athletics, as well as in intramural, club, or recreational athletics?</td>
<td>Explain any areas of noncompliance with federal laws.</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Yes</th>
<th>No</th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Institution</td>
<td>Has the university Board of Trustees completed an annual evaluation of the university President on the extent to which the institution’s sex equity goals in intercollegiate athletics have been achieved?</td>
<td>Date of Evaluation</td>
<td>Were the sex equity goals achieved?</td>
</tr>
<tr>
<td>-------------</td>
<td>-------------------------------------------------------------------------------------------------</td>
<td>-----------------</td>
<td>---------------------------------</td>
</tr>
<tr>
<td>FAMU</td>
<td>Yes</td>
<td>July, 2022</td>
<td>Yes</td>
</tr>
</tbody>
</table>
## Senior-Level Administrative Positions - Executive/Administrative/Managerial

<table>
<thead>
<tr>
<th>Indicator</th>
<th>AI/AN</th>
<th>A</th>
<th>B</th>
<th>H</th>
<th>NH/OPI</th>
<th>W</th>
<th>≥ TWO</th>
<th>NRA</th>
<th>UNK</th>
<th>NOT REPORTED</th>
<th>FEMALE</th>
<th>MALE</th>
<th>TOTAL</th>
</tr>
</thead>
<tbody>
<tr>
<td>Number, Fall 2022</td>
<td>0</td>
<td>4</td>
<td>223</td>
<td>2</td>
<td>0</td>
<td>14</td>
<td>16</td>
<td>8</td>
<td>2</td>
<td>0</td>
<td>166</td>
<td>133</td>
<td>269</td>
</tr>
<tr>
<td>Number, Fall 2021</td>
<td>0</td>
<td>6</td>
<td>223</td>
<td>2</td>
<td>0</td>
<td>23</td>
<td>7</td>
<td>5</td>
<td>0</td>
<td>0</td>
<td>157</td>
<td>109</td>
<td>266</td>
</tr>
<tr>
<td>1YR Percentage Change</td>
<td>N/A</td>
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<td>0%</td>
<td>0%</td>
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<td>-39%</td>
<td>129%</td>
<td>60%</td>
<td>N/A</td>
<td>N/A</td>
<td>6%</td>
<td>-6%</td>
<td>1%</td>
</tr>
</tbody>
</table>

Area for improvement compared with national standards? (Yes/No)

Source: IPEDS Fall Staff, IPEDS Human Resources Data.

### Terminology & Abbreviations for Race & Ethnicity

- American Indian or Alaskan Native only: AI/AN
- Asian only: A
- Black or African American only: B
- Hispanic or Hispanic and any race category: H
- Native Hawaiian or Other Pacific Islanders only: NH/OPI
- White only: W
- More than one race category: ≥2
- Non-Resident Alien: NRA
- Unknown: UNK

Source: Integrated Postsecondary Education Data System
<table>
<thead>
<tr>
<th>Indicator</th>
<th>AI/AN</th>
<th>A</th>
<th>B</th>
<th>H</th>
<th>NH/OPI</th>
<th>W</th>
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<th>NRA</th>
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<th>MALE</th>
<th>TOTAL</th>
</tr>
</thead>
<tbody>
<tr>
<td>Number, Fall 2022</td>
<td>0</td>
<td>17</td>
<td>171</td>
<td>9</td>
<td>6</td>
<td>48</td>
<td>5</td>
<td>25</td>
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<td>174</td>
<td>275</td>
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<tr>
<td>Number, Fall 2021</td>
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<td>190</td>
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<td>22</td>
<td>0</td>
<td>0</td>
<td>111</td>
<td>178</td>
<td>289</td>
</tr>
<tr>
<td>1YR Percentage Change</td>
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<td>21%</td>
<td>-10%</td>
<td>13%</td>
<td>N/A</td>
<td>-2%</td>
<td>-17%</td>
<td>14%</td>
<td>N/A</td>
<td>N/A</td>
<td>-9%</td>
<td>-2%</td>
<td>-5%</td>
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<th>MALE</th>
<th>TOTAL</th>
</tr>
</thead>
<tbody>
<tr>
<td>Number, Fall 2022</td>
<td>0</td>
<td>16</td>
<td>43</td>
<td>0</td>
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<td>15</td>
<td>3</td>
<td>15</td>
<td>0</td>
<td>0</td>
<td>44</td>
<td>42</td>
<td>86</td>
</tr>
<tr>
<td>Number, Fall 2021</td>
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<td>13</td>
<td>48</td>
<td>1</td>
<td>0</td>
<td>17</td>
<td>2</td>
<td>18</td>
<td>0</td>
<td>0</td>
<td>46</td>
<td>53</td>
<td>99</td>
</tr>
<tr>
<td>1YR Percentage Change</td>
<td>N/A</td>
<td>-23%</td>
<td>-10%</td>
<td>-100%</td>
<td>N/A</td>
<td>-12%</td>
<td>50%</td>
<td>-17%</td>
<td>N/A</td>
<td>N/A</td>
<td>-4%</td>
<td>-21%</td>
<td>-13%</td>
</tr>
</tbody>
</table>

Area for improvement compared with national standards? (Yes/No)  

Source: IPEDS Fall Staff, IPEDS Human Resources Data.

### Terminology & Abbreviations for Race & Ethnicity

| American Indian or Alaskan Native only     | AI/AN |
| Asian only                               | A     |
| Black or African American only           | B     |
| Hispanic or Hispanic and any race category | H |
| Native Hawaiian or Other Pacific Islanders only | NH/OPI |
| White only                               | W     |
| More than one race category               | ≥2    |
| Non-Resident Alien                       | NRA   |
| Unknown                                  | UNK   |

Source: Integrated Postsecondary Education Data System
## Non-Tenure-Track Faculty or Faculty at Non-Tenure Granting Universities

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<td>19%</td>
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<td>18%</td>
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Area for improvement compared with national standards? (Yes/No)

Source: IPEDS Fall Staff, IPEDS Human Resources Data.

### Terminology & Abbreviations for Race & Ethnicity

- **American Indian or Alaskan Native only**: AI/AN
- **Asian only**: A
- **Black or African American only**: B
- **Hispanic or Hispanic and any race category**: H
- **Native Hawaiian or Other Pacific Islanders only**: NH/OPI
- **White only**: W
- **More than one race category**: ≥2
- **Non-Resident Alien**: NRA
- **Unknown**: UNK

Source: Integrated Postsecondary Education Data System
<table>
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<th>Males Withdrawn</th>
<th>Males Denied</th>
<th>Males Deferred</th>
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LEGEND:

Applied: Faculty whose names have been submitted for tenure review. Sum of Withdrawn, Denied, and Nominated (or provide explanation).
Withdrawn: Faculty who withdrew from tenure consideration after applying for review.
Denied: Faculty for whom tenure was denied during the review process.
Nominated: Faculty for whom tenure is being recommended by the University.
Annual Goals to Address Areas of Underutilization

For each year in which prior year goals were not achieved, provide a narrative explanation & a plan for achievement of equity.

**Goal #1:** Increase the percentage of women faculty at the full Professor rank from 29% to 40% over the next five years (by conclusion of the 2026-2027 academic year).

**Key Strategies and Initiatives:**
- Increase opportunities for female faculty at the Assistant and Associate Professor ranks to participate in professional development and training opportunities that focus on career advancement.
- Provide release time and summer support for female faculty at the Assistant and Associate Professor ranks to afford additional time to engage in scholarly research and activities that will position them for promotion to full Professor.

**Goal #2:** Increase faculty racial/ethnicity diversity by increasing the percentage of White faculty from 17.3% to 20%, Asian faculty from 6.1% to 8% and Hispanic/Latino faculty from 2.5% to 5% over the next five years (by conclusion of the 2026-2027 academic year).

**Key Strategies and Initiatives:**
- Conduct national searches to identify top faculty for hire and utilize recruitment services, consulting firms and national publications to expand the candidate pools.
- Enhance the University’s Compensation Strategy to provide more competitive salary and benefits packages to attract top faculty for hire.

**Goal #3:** Sustain salary equity for male and female faculty.

**Key Strategies and Initiatives:**
- Enhance the University’s Compensation Strategy to provide more competitive salary and benefits packages to attract top faculty for hire.
ACTION ITEM: Annual Report and Program Plan
Element 1
Provide Oversight of Compliance and Ethics and Related Activities
1. Coordinate and conduct regular meetings with the Enterprise Compliance Committee
2. Attend the President’s Senior Leadership Team weekly meetings.
3. Serve and provide guidance to the Clery Act Compliance Committee

Element 2
Develop Effective Lines of Communication
1. Prepare and distribute ComplianceBeat communication and micro-learning opportunities.
2. Administer and promote the University’s Compliance and Ethics Hotline (Hotline).
3. Coordinate timely responses to regulatory and external agencies, as appropriate.
4. Disseminate resources and information throughout the year.

Element 3
Conduct Effective Training and Education
1. Coordinate, create, deliver and track annual completion of FAMU Fundamentals.
2. Provide trainings to constituency groups throughout the year.
3. Plan and implement the University’s annual Compliance Week learning and outreach activities.
4. Develop annual memoranda and guidance on issues of note, including conflicts of interest, Code of Conduct, privacy, and ethics.

Element 4
Revise and Develop Policies and Procedures
1. Provide guidance on policy development through the Enterprise Compliance Committee (ECC).
2. Continue to enforce and manage the University Code of Conduct and the University’s Compliance and Ethics Charter.

Element 5
Conduct Internal Monitoring and Compliance Reviews
1. Monitor the conflict of interest processes in the areas of administration, research, and procurement.
2. Contribute to the University’s privacy initiative.
3. Continue compliance partner reporting through the ECC.
4. Collaborate with the Chief Risk Officer, as appropriate, for risk bulletins and initiatives.
5. Coordinate the triage committee and analyze Hotline trends and risk areas and address appropriately.

Element 6
Respond Promptly to Detected Problems and Undertake Corrective Action
1. Receive and evaluate Hotline reports and direct complaints; refer, close, or investigate, as appropriate.
2. Provide recommendations for corrective actions and improvement of compliance and ethical decision-making. Monitor management response.

Element 7
Enforce and Promote Standards through Appropriate Incentives and Disciplinary Guidelines
1. Develop and promote compliance and ethics through incentive opportunities and various outreach initiatives, including Compliance and Ethics Week.
2. Promote awareness of University regulations, policies, procedures, and regulatory requirements.
3. Promote accountability and consistent discipline.

Initiatives
New Regulations and Special Projects
1. Assist management in addressing several areas, including: athletics, research, foreign influence, NIST 800-171, GDPR, conflict of interest, and privacy.
2. Support the expansion of the Office of Compliance and Ethics to include the Office of Equal Opportunity Programs.