



FLORIDA A&M UNIVERSITY  
OFFICE OF COMPLIANCE  
AND ETHICS

# Board of Trustees Report

June 2025





FLORIDA A&M UNIVERSITY

OFFICE OF COMPLIANCE  
AND ETHICS

# OCE Board of Trustees Report

---

Reporting Period: June 2025

Prepared by: Rica Calhoun, Chief Compliance and Ethics Officer

## 1. Executive Summary

During the reporting period, the Office of Compliance and Ethics (OCE) continued to address evolving regulatory and institutional risks while advancing key priorities in investigative response, training, and compliance risk mitigation.

### **Compliance Risk Landscape:**

Key emerging risks include AI-enhanced malware, employee misuse of generative AI, and a persistently unsettled regulatory environment. These are met with proactive recommendations and implemented strategies, including phishing simulations, drafting an Acceptable AI Use regulation, and the establishment of an AI Governance Committee. Traditional high-impact areas, such as financial exposure, emergency readiness, and research compliance changes, remain a focus. The University continues to implement mitigation efforts such as resource prioritization initiatives, FEMA-led exercises, and research grant compliance response and support.

### **Investigations:**

Between July 2024 and May 2025, the University received 82 investigative reports, slightly down from 88 during the prior year. Employee misconduct (23.17%), academic misconduct (10.98%), and conflict of interest (8.54%) were the most frequently reported issues. OCE finalized an internal SOP to support triage, resolution timelines, and institutional response consistency.

### **Ongoing Initiatives:**

- The Civil Discourse Training series is underway, reinforcing workplace respect and inclusion.
- Compliance oversight is being strengthened through mandatory training, SOP finalizations, and multi-office collaborations.
- Athletics Compliance continues weekly meetings with the Registrar's Office and Academic Advising, culminating in spring certification and reporting completed in May 2025.
- Special focus remains on Title IX, foreign influence reporting, NIL compliance, and ADA accessibility initiatives.

OCE remains aligned with its mission to promote integrity, mitigate risk, and enable operational excellence across the institution. The team continues to serve as a strategic partner in fostering a culture of ethical conduct and regulatory accountability.

## 2. Compliance Health Dashboard (Selected Compliance Risk Snapshot)

Risk Description	Status	Management Action/Mitigation
AI Enhanced Malware	● Moderate	Recommendations: phishing simulations focused on Gen-AI lures; updated incident-response playbook with AI-specific scenarios
Employee Misuse of AI	● Moderate	Acceptable AI Use regulation and micro-learning (Fall 2025); standing AI Governance Committee established; closed AI solution established
Unsettled Regulatory and Legal Environment	● High	Regular compliance and risk alerts/dashboard guidance; gap analysis and policy and process revisions prioritized, as appropriate
Increased Financial Exposure	● High	Resource prioritization and budget exercises nearing completion
Increased Emergency Incidences (Weather, Human, etc.)	● High	FEMA hurricane table-top exercise completed May 2025; review of emergency management plans
Rising Immigration Disruptions	● Low	University Police MOU and OGC guidance
Outdated directory and mapping information	● Moderate	Workday implementation set for summer 2025 to supplement data and mapping.
State funding limitations and inflationary pressures increase operational and strategic risk	● Moderate	Resource prioritization initiative nearing completion; budget reduction exercise completed
Hazing	● Moderate	Policy cross-walk with Clery & Athletics manuals; compliance plan to incorporate regulatory requirements due to amended Clery Act
Supply Chain Disruption: Tariffs, geopolitical instability, and inflation delay delivery of goods and services	● Moderate	Recommendation: price-escalation clauses; advance-purchase schedule for HVAC & lab supplies

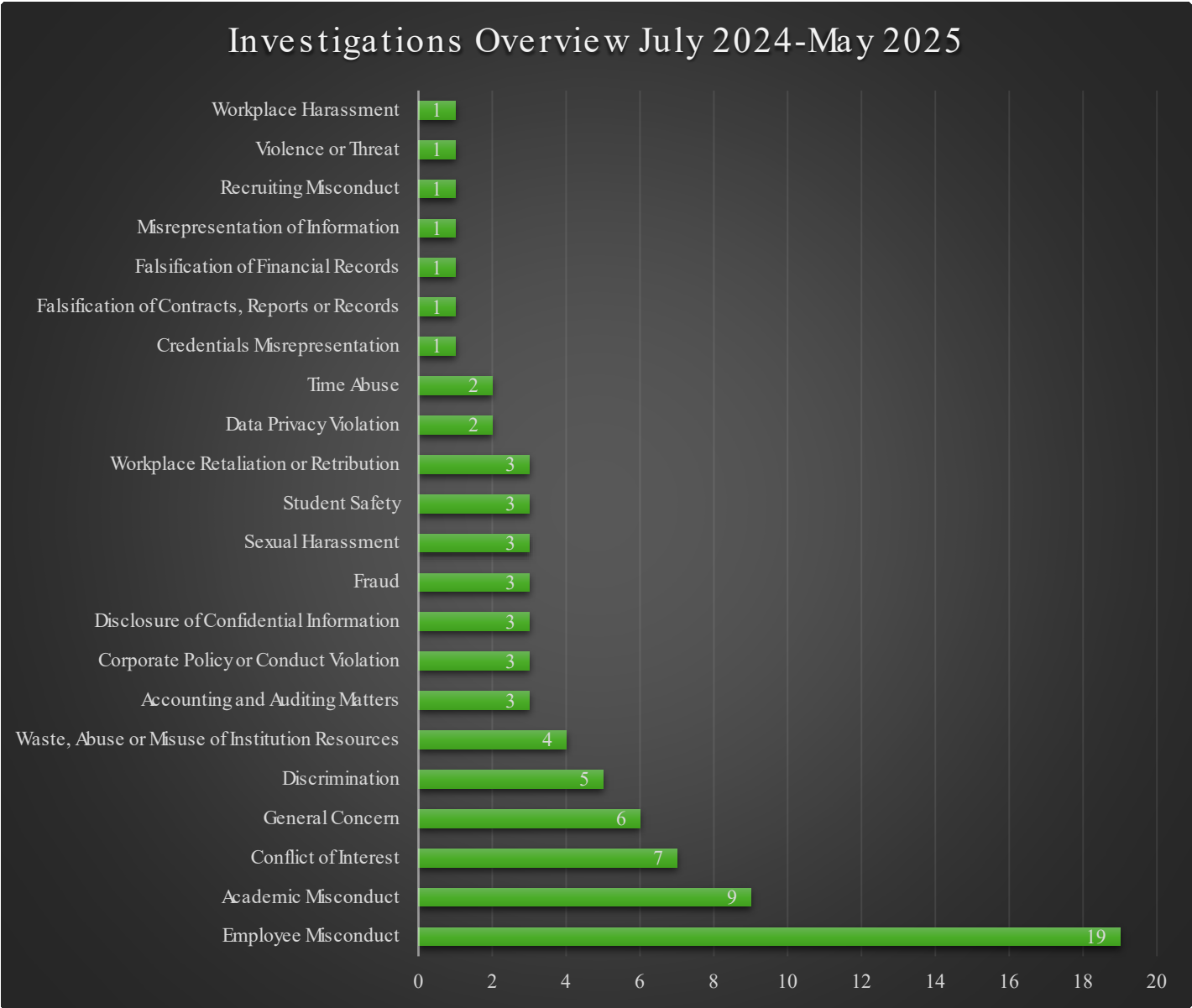




Risk Description	Status	Management Action/Mitigation
Athletics Compliance (NIL/MCAA)	● Moderate	Plan for roster management and financial commitment; maintain statutory requirements
Employee Health and Mental Wellness	● Moderate	OCE Civil Discourse Training ongoing; Recommendation: EAP awareness campaign
Research: Funding Loss	● High	Grant-diversification; Appeals/waiver advocacy strategy with coalitions; central proposal-development support expanded
Research: Indirect Cost Caps	● High	Agency advocacy; renegotiation and rebudgeting
Research: Foreign Influence (Reporting)	● Moderate	Mandatory refresher training (March 2025); certification required through Qualtrics (May 2025)

### 3. Investigations Overview (July 2024 – May 2025)

Between July 2024 and May 2025, the University’s Compliance and Ethics Hotline received and reviewed 82 investigations across a range of issue areas. The top three categories—Employee Misconduct (23.17%), Academic Misconduct (10.98%), and Conflict of Interest (8.54%)—account for over 40% of total investigations and continue to reflect heightened attention to workplace behavior, academic integrity, and transparency in research and operations. This compares to 88 complaints received during this same timeframe last fiscal year.



This analysis supports continued emphasis on targeted training, early intervention strategies, and robust escalation pathways. The Compliance Office has completed a new Internal Operating Procedure for investigative triage and resolution timelines, in alignment with best practices and institutional expectations.