



Florida Agricultural & Mechanical University (FAMU)

Office of Compliance & Ethics (OCE)

Charter – Effective 2025

This Charter supersedes the version approved in November 2022 and reflects updated U.S. Department of Justice (DOJ) guidance for effective compliance programs (March 2023 and September 2024), Florida Board of Governors (BOG) Regulation 4.003, and clarifying the expansion of the Office of Compliance and Ethics to include Equal Opportunity Programs (EOP) and the Athletics Compliance Office (ACO).

1. Purpose and Mission

The Office of Compliance & Ethics (OCE) is comprised of Institutional Compliance & Ethics, Equal Opportunity Programs (EOP), and the Athletics Compliance Office (ACO). Following the structural integration of EOP and ACO under the OCE umbrella, ongoing alignment efforts promote consistent application of compliance policies, oversight mechanisms, risk assessments, and training protocols across program areas.

OCE supports the University's mission and Boldly Striking Strategic Plan by:

- embedding a culture of integrity, fairness, equity, and accountability in University operations;
- proactively identifying, assessing, and mitigating compliance and ethics risks, including civil rights and athletics-specific risks;
- promoting adherence to applicable laws, regulations, National Collegiate Athletic Association (NCAA) and athletic conference bylaws, University policies, and professional standards;
- delivering targeted training and outreach for stakeholders;
- providing clear channels for reporting concerns without fear of retaliation; and
- monitoring, evaluating, and continuously improving program effectiveness aligned with DOJ, U.S. Sentencing Guidelines Chapter 8, and BOG Regulation 4.003 requirements.

2. Scope and Applicability

This Charter applies to all members of the University community; including, without exception: researchers, employees, students, contractors, volunteers, auxiliaries, and direct-support organizations. OCE is expressly comprised of:

- **Institutional Compliance & Ethics** – General compliance and ethics program oversight and implementation;
- **Equal Opportunity Programs (EOP)** – enforcement of federal/state civil-rights laws (e.g., Title VI, Title VII, Title IX, Section 504, ADA, and the Pregnant Workers Fairness Act (PWFA));
- **Athletics Compliance Office (ACO)** – oversight of NCAA, conference, and state collegiate-athletics requirements, including Name, Image & Likeness (NIL) and Academic Progress Rate (APR).

3. Reporting Structure and Independence

Consistent with BOG Regulation 4.003(5), the Chief Compliance & Ethics Officer (CCEO) reports functionally to the Board of Trustees (BOT) Audit, Risk, and Compliance Committee and administratively to the University President. The CCEO has unrestricted access to the BOT Chair, the Audit, Risk, and Compliance Committee Chair, and the University President.

OCE, EOP, and ACO directors report to the CCEO, ensuring unified governance and independence. The CCEO ensures consistent coordination with the Division of Audit, Enterprise Risk Management, and other risk and assurance functions to enhance risk mitigation and prevent duplication of effort.

Obstruction, retaliation, or interference with OCE activities is strictly prohibited.

Enterprise Compliance Committee

The Enterprise Compliance Committee (ECC), coordinated by the CCEO, serves as a cross-functional advisory body of Compliance Partners that supports the identification, monitoring, and mitigation of enterprise-level compliance risks. The ECC facilitates information sharing across key units, promotes consistent application of compliance controls, and informs institutional priorities through collaborative review of risk assessments, trends, and emerging obligations.

Compliance Partners across the University maintain a dotted-line reporting relationship to the CCEO, reflecting their obligation to coordinate on risk mitigation efforts, participate in the ECC, and escalate significant compliance concerns, trends, or failures that may adversely impact the University.

4. Authority

The OCE is authorized to:

- initiate and conduct reviews or investigations of any University activity or third party operating on behalf of the University;
- access all records, information systems, facilities, and personnel necessary to fulfill its mandate;
- allocate resources, set priorities, and engage external experts as appropriate; and
- recommend corrective action and follow-up to ensure timely remediation.

5. Organizational Oversight

The BOT (or its Audit, Risk, and Compliance Committee) will:

- review and approve this Charter and any amendments at least every three years;
- review and approve the Compliance & Ethics Program Plan and any subsequent changes;
- receive regular reports from the CCEO on program effectiveness, significant matters, and resource needs;
- ensure adequate funding and staffing of the OCE, EOP, and ACO; and
- engage in individual executive sessions with the CCEO as necessary to preserve independence.

6. Duties and Responsibilities

The OCE shall establish and maintain an effective compliance and ethics program incorporating the seven (7) elements of USSG §8B2.1, the DOJ Evaluation of Corporate Compliance Programs hallmarks, and BOG Regulation 4.003. Key responsibilities include:

A. Governance & Culture

- Champion “tone at the top” through visible leadership support and integration into performance evaluations, incentives, and disciplinary measures.
- Maintain and periodically update the University Code of Conduct.

B. Risk Assessment

- Conduct a documented, risk-based compliance assessment at least annually covering academic, research, financial, athletics, and civil rights risks.
- Risk assessments will include consideration of emerging technologies, including artificial intelligence and the potential impact on compliance obligations, operations, and institutional risk.

C. Policies & Procedures

- Coordinate with the Office of University Policy to issue, review, and align appropriate policies and SOPs with evolving regulatory requirements.

D. Training & Communication

- Deliver risk-based training to identified stakeholders;
- Track and report completion metrics.

E. Monitoring & Internal Controls

- Implement data-driven monitoring, including the use of analytics tools, dashboards, and metrics to identify anomalies, trends, and potential compliance risks.

F. Reporting & Investigations

- Promote a robust “speak-up culture” by ensuring that all employees understand their right to report concerns without fear of retaliation;

- Operate a 24/7 third-party hosted hotline and online portal;
- Ensure reasonable triage and fair investigations;
- Training and outreach efforts will include information on both internal and external reporting avenues, including the Division of Audit's whistleblower oversight authority.
- OCE will periodically assess employee willingness to report and adjust awareness efforts accordingly."

G. Enforcement & Incentives

- Recommend disciplinary actions and incentives that reinforce compliance and ethical behavior.

Supplemental responsibilities include:

H. Third-Party Management

- Coordinate with appropriate offices to provide due diligence and oversight of vendors, agents, and other third parties.

I. Mergers, Acquisitions & New Programs

- Participate in due diligence for new academic, research, or athletics ventures to identify compliance risks early.

J. Continuous Improvement

- Commission an independent external effectiveness review at least every five (5) years per BOG 4.003(5)(f).
- Utilize benchmarking, lessons learned, and metrics to evolve the program.

K. Equal Opportunity Programs (EOP) Specific

- Administer discrimination, harassment, and Title IX complaint processes;
- Issue external reporting plans, as appropriate; ensure ADA accessibility and related regulatory compliance.

L. Athletics Compliance Office (ACO) Specific

- Monitor recruiting, amateurism, financial aid, and eligibility rules;
- Coordinate NIL disclosures and education;
- Conduct rules-education sessions;
- Liaise with NCAA and conference offices.

7. Professional Standards

OCE personnel shall adhere to:

- Florida Code of Ethics for Public Officers and Employees (Chapter 112, F.S.);
- Society of Corporate Compliance and Ethics (SCCE) Code of Professional Ethics;
- DOJ Compliance Program Guidance (March 2023 and September 2024) and USSG §8;
- NCAA Compliance Best Practices (for ACO staff);
- Title IX and Civil Rights Compliance Best Practices (for EOP staff); and,

- Applicable investigation standards for the State University System of Florida.


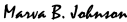

8. Public Records and Privacy

Information obtained during OCE activities is addressed in accordance with Florida public-records law, the Family Educational Rights and Privacy Act (FERPA), and other privacy requirements.

9. Review and Amendment

This Charter shall be reviewed by the CCEO for alignment with evolving regulations and best practices no less than every three (3) years and presented to the BOT for approval. Interim amendments may be made when significant regulatory changes occur or the program scope materially changes.

10. Effective Date and Approvals

Role	Signature	Date
Chief Compliance & Ethics Officer		9/22/2025
President		9/22/2025
BOT Audit, Risk, & Compliance Committee Chair		9/22/2025

Approved by the Florida A&M University Board of Trustees on September 18, 2025.