

## THE COMPLIANCE CHRONICLES

**FAMU's Compliance & Ethics Newsletter** 

**MAY 2023** 

**VOLUME ONE | EDITION ONE** 



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**COMPLIANCE & ETHICS** 

#### MESSAGE FROM THE CHIEF COMPLIANCE & ETHICS OFFICER, RICA CALHOUN

Greetings Rattlers,

I am thrilled to welcome you to the inaugural edition of Compliance Chronicles, the newsletter dedicated to keeping you up-to-date with the latest compliance and ethics news, best practices, and trends.

As the chief compliance and ethics officer at FAMU, it is my responsibility to ensure that our organization adheres to the highest standards of ethical conduct and compliance with regulatory requirements. With Compliance Chronicles, I hope to share our commitment to these principles and provide valuable insights to help you do the same.

In each edition, we will feature compliance articles, highlight recent regulatory changes and enforcement actions, and showcase innovative compliance initiatives from around the industry. We will also share tips and best practices to help you navigate complex compliance and ethics challenges.

#### Some highlights:

- 1.Code of Conduct: Our university's code of conduct serves as a guide for ethical behavior and sets the standards for all members of our community. We encourage everyone to review the code of conduct regularly and to raise any questions or concerns with the appropriate individuals or departments.
- 2. Compliance Training: Compliance training is an essential component of our university's commitment to ethics and compliance. We remind all employees to complete their annual compliance training by the required deadline. The training provides important information and resources to help ensure that we are all aware of our responsibilities and obligations.
- 3. Reporting Concerns: Our university encourages individuals to report any concerns related to compliance or ethics. We have a variety of reporting mechanisms in place, including an anonymous hotline and an online reporting system. It is important to remember that reporting concerns is an important step in maintaining our culture of integrity and accountability.
- 4. Regulatory Updates: We continue to monitor and adapt to changes in the regulatory landscape. Our team works closely with relevant stakeholders to ensure that our policies and procedures are up-to-date and aligned with current requirements.

I encourage you to read, share, and provide feedback on our newsletter. We welcome your ideas and suggestions for topics to cover in future editions. Thank you for your interest in Compliance Chronicles, and we look forward to keeping you informed and engaged.

#### Best, Rica Calhoun



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## WHAT'S NEW?

#### **FAMU Fundamentals 2023**

Our Mandatory Compliance Training Program concluded on March 31, 2023. This was our fourth year of online training for the University and we saw an increase in raw numbers and percentages over last year. Where completion numbers over the last two years were consistently around 80%, we are inching toward about 90% across most modules. Thanks to all members of the University community who have taken this training seriously!



Remember that Compliance starts with You.

"Ethics and equity and the principles of justice do not change with the calendar." D.H. Lawrence (British poet, novelist, and essayist)

## **FAMU FUNDAMENTALS 2023**

#### Completion Percentages

Based on our core audience of 2035 (faculty, staff, and graduate students), we've got some preliminary completion numbers and percentages:

- 1.Clery: 1704/84%
- 2.Compliance and Ethics: 1789/88%
- 3. Enterprise Risk Management: 1774/87%
- 4. Public Records: 1774/87%
- 5. Cyber Security: 1778/87%
- 6.Emergency Management: 1779/87%
- 7. Sexual Harassment Prevention...: 1808/89%

#### Accountability

We continue to advocate for managers to enforce accountability for noncompliance. Remember that compliance is one of the core elements of the USPS and A&P performance evaluations and compliance should be taken into consideration for all University constituency groups.

#### Post-Survey Feedback

Feedback from the University community is valuable to the team as we develop FAMU Fundamentals 2024. Use the QR Code below to access:





## WHAT'S NEW?



Please join us in congratulating **Miranda Levy** on her new role as Coordinator in the Office of Compliance & Ethics!

Ethics is knowing the difference between what you have a right to do and what is right to do. **Potter Stewart** 

## **RECENT ACCOMPLISHMENTS**

#### TLH 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.

#### FBI Compliance Academy

La'Tonya Baker, Compliance Manager, was 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.



# COMPLIANCE TRENDING TOPICS

This section shares trending topics in the world of compliance.

#### **Conflict of Interest - Hiring Family Members**

Universities are often large and complex organizations with many employees and stakeholders. As a result, it is not uncommon for individuals within the organization to have personal or familial relationships with each other. While these relationships are not necessarily problematic, they can become a conflict of interest when they influence hiring decisions or other employment-related decisions. We must be careful to ensure that our hiring processes are fair, transparent, and based on merit rather than personal relationships. Failure to do so can lead to accusations of nepotism, ethics violations, and undermine FAMU's reputation.

#### "Conflict of Interest - Burning the Candle at Both Ends"

Burning the Candle at Both Ends" is a fictional story that illustrates ethical choices related to conflicts of interest. It reminds us how important one person's ethical choices can be in maintaining a University's reputation for fair and honest business practices. You can read all about it on the next few pages.



#### "CONFLICTS OF INTEREST - BURNING THE CANDLE AT BOTH ENDS"



At the start of the weekly editorial staff meeting, Buzz noticed Josie text messaging. Josie was his longtime contract writer, who worked on several of the University's publications. He cleared his throat. "Josie, are you on track with all three fall issues?"

She snapped to and lifted her head. "What? Uh, sure. I just need to interview the management team for the Waterways cover story." "Have you set that up?" Buzz asked.

"No, not yet," she said, taking her papers and laptop from her case and putting them on the conference table. "Well, you know, those guys are hard to pin down," he said. "Like herding cats. You better get on it." "Tell me about it," she said. "I'll call today." As she opened her laptop, several magazines and pages of notes slid and fluttered onto the floor. The publications director, Sheryl, helped her collect them.

Say, Josie," Sheryl said. "Did you happen to send a review copy of the newsletter to Lola? I saw her at the training last week and she said she hadn't received it yet."

"Uh-oh!" said Josie. "I totally spaced it. I'll send it to her today."

Sheryl glanced at the stack of materials she had straightened up for Josie. "Hmm. These aren't our publications. Wow... this real estate one looks good. I'm thinking of buying a house. Can I borrow this copy?"

"Sure, that's an old one. And besides, I finally knocked out my project for them this morning --before I got the kids up for school."

After the meeting, Buzz stopped Josie as she rushed out of the conference room.

"You seemed to be only half-here during the meeting," he said.

"I just have a lot on my plate right now," she said. Just then her cell phone rang. She held up her index finger. "Sorry, I've got to take this," she said. "Be right with you." She ducked into an empty office across the hallway. After a few minutes, Josie stood at Buzz's office door. "Sorry... so, what were you saying?"

"Sit down for a minute," he said. "Is everything OK? You seem pretty stressed out."

"Well, I am, a little," she said, sitting down but perching at the edge of her chair as if poised for a quick getaway. "My ex just moved to Texas for a new job, so I've got the kids full-time. And he still hasn't rented his house here. With two mortgages to pay, you can bet he's not sending any child support. The bottom line is, yeah, I've been working a lot."

"With all our quarterly publications coming out at the same time," he said. "That's a lot to manage by yourself."

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#### **"BURNING THE CANDLE AT BOTH ENDS" (PAGE 2)**



"A perfect storm!" she said, seeming to force a smile. "And I'm sure you've got other demanding clients besides us," he said. "Yes, unfortunately that's the way we contractors have to live -- I actually have too many, but I really can't turn down any work right now," she said.

"Listen, Josie," Buzz said firmly, "I hope you're not doing work for them on our time." She lowered her head. "No -- well, occasionally I need to take a call when I'm here but I make up the time and keep track of my hours for you exactly," she said.

"Well, okay," he said doubtfully. "What was that text messaging in the meeting all about?" "I'm sorry, yes, that was another client, texting with a little... crisis. I had to answer. But don't worry, I do your work on their time too."

Buzz shook his head. "I wish that were a consolation, Josie. But I'm thinking that your work here is suffering a bit from your other commitments. Would you agree?"

"I keep it all straight -- really -- even if I'm burning the candle at both ends," she said.

Buzz replied, "You do look like you could use a little more sleep. I'm not sure I could juggle everything the way you are. Anyway, just make sure you're tracking your hours accurately and you're putting full energy into our projects."

"You bet. You know I always meet deadline," she said in a strained voice. Buzz smiled a bit uneasily. "I just hope we don't have a conflict of interest going on here," he said. "My business doesn't compete with yours," she replied, "nor do my clients."

"That's not what I mean. I'm talking about a conflict of time and energy," said Buzz. "Your outside work can't interfere with your job performance here. We need your top-notch work, which I know you are capable of."

"I got it, Buzz," she said, pursing her lips. "But you might show a little compassion," she said curtly. As she turned and walked away, he could hear her mutter. "I just don't know how I'm going to do it all."

(continued)



#### **"BURNING THE CANDLE AT BOTH ENDS" (PAGE 3)**

#### **KEYS TO REMEMBER**



Contractors and full-time employees alike have a responsibility to make the work they do for the University their first priority while they are on the job.



Conflicts of interest include not only working for a University that is clearly in competition with ours, but also taking on outside work that conflicts with one's ability to perform the job for our University to the best of one's ability.



Time is a University resource, as much as is money, and an employee's decision to spend time at our University performing outside work is a misuse of that resource.



Addressing issues directly and in a timely fashion fosters a culture of openness, honesty and trust, which supports the core values and smooth functioning of our University.





## OCE ON THE MOVE!

Recent Happenings in the Office of Compliance & Ethics



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.



#### SEE SOMETHING, SAY SOMETHING

#### See Something, Say Something



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!

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#### **ASK COMPLIANCE**

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.



## Meet the University Compliance OCE Team



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