

**FLORIDA A&M UNIVERSITY UPDATE ON ACTIONS TAKEN
REGARDING SOUTHERN ASSOCIATION OF COLLEGES AND SCHOOLS
COMMISSION ON COLLEGES (SACSCOC)**

December 13, 2012

Florida A&M University (FAMU) is working diligently to address the concerns expressed by SACSCOC in its June 2012 letter and has also put measures in place to bolster its anti-hazing efforts, including new policies, academic requirements, and educational components. Preliminary information provided during the December 2012 SACSCOC meeting indicates that FAMU is no longer being cited for Comprehensive Standard (C.S.) 3.4.5 (Academic Policies) and C.S. 3.9.1 (Student Rights). Two issues were added during the December 2012 meeting related to the 2011 internal audit investigation involving SACS requirement 1.1 (Principle of Integrity), in which the institution is required to operate with integrity in all matters; and C.S. 3.2.8, which pertains to Qualified Administrative/Academic Officers. This requirement maintains that the institution has qualified administrative and academic officers with the experience and competence to lead the institution. Although these issues are not covered in the July 2012 response, FAMU will show compliance with these standards and develop additional measures as needed. Below is a summary of the actions taken by FAMU since receiving the initial June 2012 letter from SACSCOC:

C.S. 3.4.5 – Academic Policies

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

C.S. 3.9.1 – Student Rights

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

Specific SACSCOC Concern for C.S. 3.4.5 and C.S. 3.9.1:

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

Actions Taken to Ensure Compliance with C.S. 3.4.5 and C.S. 3.9.1:

I. Enhanced eligibility requirements for band participation

- Limitations on practice hours (20 hours per week);
- Non-FAMU students ineligible for band participation (participants must be full-time FAMU students);
- Limitation on years of eligibility (maximum of four years of band participation).

II. Enhanced membership intake processes for clubs and organizations

- Potential members are now required to attend workshops on topics such as anti-hazing, community service, and new member rights and responsibilities as described in the revised guidelines for membership intake and the President's August 22, 2012 letter;
- Freshman students are prohibited from joining clubs or organizations that have membership intake processes (excludes academic clubs and organizations);
- Students must have earned 24 or more credit hours with a minimum GPA of 2.0 by the end of the freshman year to apply for membership in clubs or organizations that have membership intake processes;
- Students must attend five (5) Personal and Professional Development Training sessions or workshops through the Office of Student Activities.

III. Revised the organizational structure for the Department of Music

- The revised structure creates individual directors for each ensemble, who will each report to the department chair; and
- The revised procedures prohibit the department chair from serving as director of any other ensemble.

IV. Revised procedures for Group Travel

- Approval of all students, faculty, staff and non-employees by directors, the music department chair, the compliance officer, and the dean prior to initiating the travel approval process;
- Non-employee (e.g. students, prospective employees, speakers, consultants) travel is permissible under university policy and non-employees must adhere to all university travel policies and procedures;
- Assessment of the adequacy of chaperones to provide oversight of the group by the Department of Music chair and the dean. Chaperones must be employed as either faculty or staff in the music department and they are expected to monitor student conduct and behavior to ensure that students comply with all university policies and procedures while traveling. The music department chair and compliance officer are responsible for regularly evaluating the performance of the chaperones; and
- Travel advances shall be provided in accordance with university policy only to travelers certified by the compliance officer. Payments must be signed for by each individual traveler. All travel records shall be housed by the chair, the dean's office and in the office of the University Comptroller.

V. Implemented initiatives to increase awareness of Anti-Hazing Policy and institutional anti-hazing initiatives

- Created an anti-hazing website (StopHazingatFAMU.com). The site contains the Anti-Hazing policy, the Florida Hazing Law, and a link that allows for the reporting

- of hazing incidents to the FAMU Police Department; and
- Implemented new requirements for student registration. Beginning with the spring 2013 semester, all students will be required to sign an anti-hazing pledge attesting they will not participate in any form of hazing. Students who do not complete the pledge will not be allowed to register for classes.

VI. Development and implementation of Anti-Hazing Plan

- The Updated Anti-Hazing Plan included the development of many of the measures cited above and the formation of a committee that would examine the ritual of hazing on FAMU's campus and offer recommendations on how the university could further address the ritual.

C.S. 3.10.3 – Control of Finances

The institution exercises appropriate control over its financial resources.

Specific SACS Concern for C.S. 3.10.3:

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

Actions Taken to Ensure Compliance with C.S. 3.10.3:

The University has received several investigative and audit reports related to the Division of Audit and Compliance incomplete audits, the review of Band related financial matters, and other travel related issues. The University has developed a corrective action plan and is in the process of implementing such actions to address each of the findings and recommendation. Additionally, each respective unit is in the process of developing unit corrective action plans to further ensure that the University addresses each finding.

I. Division of Audit and Compliance issues

- The Vice President of Audit and Compliance resigned in November 2011 due to the discovery of incomplete audits (summary audits) that were provided to the Board of Trustees and/or other external agencies, including the Board of Governors;
- Hired a new Vice President of Audit and Compliance with 22 years of experience in auditing in June 2012;
- Hired Sniffen and Spellman to perform an audit of the 15 incomplete audits performed and reported by the Division of Audit and Compliance;
- As a result of the Sniffen and Spellman report, the university hired Ernst and Young to review the remaining eight incomplete audits (summary reports);
- Since receipt of the two reports of the aforementioned auditing firms, respective units have developed and are implementing corrective action plans to address each of the findings and recommendations; and
- After the release of the FDLE Report, the university entered into a contract with

Ernst and Young to review the findings.

II. FDLE Investigation Report

- Employee misuse of P-Card:
 - Employee found to have misused the P-Card in the amount of approximately \$1,800;
 - Employee was arrested by local authorities;
 - Employee was terminated by the university because of employee's actions in the misuse of P-Card;
- Enhanced the management and oversight of P-Card;
- Revised the reconciliation process and forms to prevent future misuse of travel related expenditures; and
- Conducted a mandatory training session for all P-Card holders in September 2012.

III. Band issues

- Enhanced the approval process for band travel;
- Established new position to address hazing, Special Assistant to the President. Note: the screening process has begun and three candidates have been interviewed for the position;
- Established new position in the music department to address and monitor compliance of all band related activities, Compliance Officer for music department. Note: This search process is underway for this position;
- Enhanced group travel roster form;
- Revised process for issuance of funds to travelers;
- Enhanced process for non-employee travel; and
- Enhanced reimbursement process and developed procedures to address the reconciliation process of group travel funds.

CS 3.11.2 – Institutional Environment

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

Specific SACSCOC Concern for C.S. 3.11.2:

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

Actions Taken to Ensure Compliance with C.S. 3.11.2:

- Suspended the Marching Band through at least the 2012-13 academic year;
- Created two new positions: the screening of applicants for the Special Assistant to the President for Anti-Hazing and the Compliance Officer for Music, are well under way;

- A new anti-hazing website (StopHazingatFAMU.com) was launched on September 7, 2012;
- Disciplinary actions taken against two Department of Music professors due to inappropriate behavior related to hazing;
- Appointed Interim Department of Music Chair;
- Provided additional grief counselors to students dealing with the loss of a student band member;
- Created an Internal Crisis Management Team;
- Developed a webpage to provide information about the band hazing incident to FAMU supporters locally and outside of Florida;
- Directed all allegations and criminal activity to be immediately brought to the President's attention;
- Established Internal Anti-Hazing Research Initiative;
- Suspended spring 2012 Intake and New Membership activities for student clubs and organizations, except those reviewed and approved for exemption;
- Canceled the 2012 Summer Band Camp;
- Held campus-wide Safety Forum on December 5, 2011;
- Identified staffing and organizational needs in the Division of Student Affairs to address hazing-related issues for more effective management of student organizations. Two new positions have been created — a director of judicial affairs and a coordinator of judicial affairs;
- Revised Board of Trustees Anti-Hazing Policy;
- Held Anti-Hazing Workshop for Board of Trustees on December 7, 2011;
- Enhanced criteria for future band membership/participation;
- Participated fully in the FDLE and BOG investigations; and
- Generated immediate electronic posting of the Anti-Hazing Agreement for all students to complete when using the student administration system (iRattler) to register for classes.