

Annual Report





Annual Report

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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.



FAMU Fundamentals



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

University Community Insights



Post-Training Survey

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)



Enhancement Strategies for 2023



Compliance and Ethics Week 2022



FAMUly Matters!

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



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.



Complaints Received





Investigations: Issue Comparison

Issue Types 2021-2022

Issue Types 2022-2023



Investigations: Trends



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.



of reports received were anonymous in 2021-2022



of reports received were anonymous in 2022-2023

Ongoing Compliance Work in Research

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

Compliance Memo: Conflicts of Interest in Research



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



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

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:

ATHLETICS

Coordination with the Associate Athletic Director of Compliance to monitor and address risk areas:

Eligibility

Academic Progress Rate

NCAA Infractions Report Monitoring

Athletics Action Plan

Compliance External Review and Report

PRIVACY

Advised University leadership regarding best practices related to the establishment of a University Privacy Program; continued implementation monitoring

COMPLIANCE AND ETHICS HOTLINE

Managing the compliance and ethics hotline for appropriate investigation or referral to triage partners

RESEARCH

Policy and process updates regarding foreign influence screening, travel, and gift reporting

CAMPUS SAFETY

Supports the Division of Student Affairs through the establishment of the Behavioral Threat Assessment Team to identify and mitigate acute behavioral concerns.

MMERI

Served on the MMERI taskforce to provide assistance and guidance regarding program compliance.

GOVERNANCE

Originated on-demand compliance training for the BOT

ENTERPRISE COMPLIANCE COMMITTEE

Enterprise Compliance Committee Meetings: 2022-2023: October, February, May

Working Group Meetings scheduled by compliance partner chairs

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:

Research: Export Control/Tech Transfer	Interdepartmental: Foreign Influence Travel Reporting
Faculty Senate: Membership Parameters	Athletics: Sport Specific Improvement Plan Progress
Research: Foreign Travel	Research: Grant Compliance
Athletics: Athletics Plan	Interdepartmental: USDA Compliance Visit and Mock Visit
Interdepartmental: Conflict of Interest	Athletics: External Compliance Progress Report



Organizational Chart



Equal Opportunity Programs



Latrecha Scott Director, Equal Opportunity Programs



Assistant Director



Letitia McClellan Title IX Coordinator









Compliance and Equity Focus 2023-2024



Boldly

Striking

Strategic

Priorities

ATHLETICS COMPLIANCE OFFICE

OPPORTUNITY PROGRAMS

FLORIDA A&M UNIVERSITY

2023-2024 Areas of Focus

Strategic Priority Areas

1. Student Success (SP #1)

FA

FAM

- 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

Athletics Compliance Office

Equal Opportunity Programs

The Compliance Chronicles



THE COMPLIANCE CHRONICLES

FAMU's Compliance & Ethics Newsletter

AUG 2023

VOLUME ONE | ISSUE TWO

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COMPLIANCE & ETHICS

MESSAGE FROM THE CHIEF COMPLIANCE & ETHICS OFFICER, RICA CALHOUN

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

CONTACT US





E-MAIL: OCE@FAMU.EDU

WHAT'S NEW IN OCE?

We are thrilled to announce a significant expansion in the Office of Compliance and Ethics here at FAMU.

Last year, we welcomed the Athletics Compliance Team, and now we welcome Equal Opportunity Programs with great excitement.

This strategic integration allows us to strengthen our commitment to fostering a culture of fairness, integrity, and inclusivity throughout the FAMU community.

CONGRATULATIONS ON YOUR ACHIEVEMENT

A'TONYA BAKER

DIRECTOR OF COMPLIANCE.

CHIEF PRIVACY OFFICER

FAMU OFFICE OF COMPLIANCE

"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! La'Tonya Baker presented Superheroes and Kryptonite for the following:



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.



COMPLIANCE & EQUITY RETREAT



ANNUAL DISCLOSURE CONFLICT OF INTEREST

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. 2023 HBCU RISK MANAGEMENT

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.

OCE and Division of Audit team members attended the 2023 HBCU Risk Management Conference in Houston, TX, in June 2023. They engaged in topics such as Liability Landscape & Critical Risks Facing Higher Education, Third-Party Risks and Relationship Management, and Planning for Crisis and Chaos. The team collaborated and connected with other risk managers and compliance officers from HBCU's across the U.S.

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.





WHAT'S NEW IN EOP?







RECENT ACCOMPLISHMENTS

Title IX

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 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

OMPLIANCE

- Quid Pro Quo
- Hostile Environment

Any individual can report Title IX related matters. Individuals can report in person, telephone, or email to <u>titleix@famu.edu</u>.

EOP Highlights

The Office of Equal **Opportunity Programs (EOP)** initiated an ambitious campaign to cultivate inclusivity and awareness on campus. Through 200 inperson 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.



06

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!

ATHLETICS COMPLIANCE TEAM





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 ran 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. <u>(link)</u>

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)

*Source: University of Auburn's Office of Audit, Compliance & Privacy



COMPLIANCE IN FOCUS - CONT.

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)

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. <u>(link)</u>

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)



OCE INTERNS ON THE MOVE!



Recent Happenings in the Office of Compliance & Ethics



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.







COMPLIANCE SPOTLIGHT

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!



THE OFFICE OF PROPERTY RECORDS

The Office of Property Records has increased its efforts in promoting and assisting departments in managing University records and property throughout the life cycle. For forms and guidance, visit their website, located <u>here</u>.

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.

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!

Meet the University Compliance (OCE) Team



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Meet the University Equal Opportunity Programs (EOP) Team



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Meet the University Athletics Compliance Team



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ACTION ITEM: Annual Report and Program Plan

FAMU FLORIDA ARM UNIVERSITY OFFICE OF COMPLIANCE AND ETHICS Compliance and Ethics Program Plan 2023-2024

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 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 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

Element 2

Develop Effective Lines of Communication

- 1. Prepare and distribute Compliance Beat communication and microlearning 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 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 6

Respond Promptly to Detected Problems and Undertake Corrective Action

, address appropriately.

Element 7

Enforce and Promote Standards through Appropriate Incentives and Disciplinary Guidelines



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- 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, polices, 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.

- and direct complaints; refer, close, or investigate, as appropriate.
- 2. Provide recommendations for corrective actions and improvement of compliance and ethical decisionmaking. Monitor management response.

Element 8 Measure Compliance Program Effectiveness

- 1. Develop and issue OCE's annual compliance and ethics report.
- 2. Implement program enhancement measures identified in the external five-year program review.
- 3. Analyze and benchmark results from compliance and ethics culture surveys administered in 2021 and 2023.
- 4. Develop, measure, and track office efforts through the University assessment process.

FAMU's Office of Compliance and Ethics