



FLORIDA A&M UNIVERSITY OFFICE OF COMPLIANCE AND ETHICS

The mission of the Office of Compliance and Ethics (OCE) is to support the University's mission and strategic plan by proactively partnering with faculty, staff, and management to:

- Ensure compliance risks are identified, prioritized and managed appropriately;
- Establish a control environment, level of accountability, and ethical framework that promotes commitment to the highest standards of ethics, integrity, and lawful conduct by facilitating adherence to all applicable federal, state, and local laws, regulations, as well as standards and internal policies and protocols;
- Provide general compliance training to employees and faculty and guidance to managers;
- Provide an avenue for anonymous reporting of potential non-compliance or unethical behavior; and
- Develop effective policies and procedures to promote compliance and ethical behavior.

Some OCE highlights:



Support 'Boldly Striking'

Support the University's Strategic Plan in strengthening the University's culture of strategic decision making through promotion and enhancement of compliance, internal controls, and enterprise risk management practices with an emphasis on engagement, education, reporting, and accountability.

Working collaboratively with university leadership and management to support a culture of compliance and ethical decision-making.

Please review our University Code of Conduct, included in this packet and at:
<https://bit.ly/3q1kE6K>



Compliance Risk Mitigation

Provides oversight and guidance regarding university-wide ethics and compliance activities through the established Enterprise Compliance Committee and Compliance Partners throughout the University. This group focuses on continuous mitigation of compliance risk.

OCE investigates misconduct related to compliance and ethics. Reporting misconduct is the responsibility of every member and is encouraged through the Compliance and Ethics Hotline (<https://bit.ly/3mCXDEK>).



Outreach and Communication

Focuses on consistent communication and training for all members of the University community. Assesses university culture through annual surveys and events.

Please visit our office at Foote-Hilyer Room 105 for more information. We are here to help!

Questions? Contact OCE at 850-412-7520 or rica.calhoun@fam.u.edu
For more information, you can also visit: <https://fam.u.sharepoint.com/sites/FAMUOCE>
(use your FAMMAIL login credentials to access the page).



Code of Conduct: The Code and the Road

You're driving to a wedding. You thought the directions to the address were clear but suddenly nothing looks familiar. You drive in circles, turning the directions over and over in your mind as you anxiously watch the hands of the clock. Finally, in a moment of clarity, you remember the road map in your glove box. Quickly, you re-orient yourself to your current location and arrive breathlessly just as the ceremony begins.

Like a good road map, our University Code of Conduct (Regulation 1.019) can help you get your bearings in a tough situation. Our Code is a navigation tool specifically designed to guide your daily decisions in the right direction. But just like the map in the glove box, the Code won't help if it's sitting on the shelf in your office. To reap its benefits, you have to understand its contents and access it when needed.

The Code as a Road Map

Our Code is a road map for appropriate behavior on the job. It outlines our University's base expectations and the responsibility of each employee. It summarizes our policies and procedures about important topics such as Gifts, Conflicts of Interest, Health and Safety, and Confidentiality and Privacy. The Code applies not only to employees but also to those doing business with our University. It is distributed internally to every employee as well as publicly available on our University website.

The Code also reinforces our mission and suggests ways to apply these principles. For example, the guiding principle of "respect in dealing with others" may translate to a statement such as "we don't use degrading or offensive language in the workplace."

How to Use the Code

Just like the road map, the Code is a resource. Here are some ways to use the Code that may make your trip easier.

- Become very familiar with the Code
- Ask for clarification on sections that may be unclear to you.
- The Code contains resources, including points of contact to answer your questions and for reporting issues and concerns. Review the code and decide where you would turn first, and second, if you had a concern.

Items of Note:

- If applicable, consider ways to help your direct reports understand the topics in the Code and to realize that the Code is a resource for ethical decisions.
- Determine which topics of the Code present higher risk for your division/department/unit. These are the areas where you will need to provide the most guidance in order to avoid problems.
- Check your own behavior to be sure that you are applying the policies in the Code evenly and accurately no matter who is involved.
- Practice ethical decision-making. Include consideration of ethics, our guiding principles, policies and laws in every decision that you make. Be a model of ethical action by ensuring that employees around you or your direct reports know that you always include ethical considerations in your decisions.

Reaching Our Destination

Our Code of Conduct sends a clear message about where our University is today and what our emphasis is as we move down the road toward the future. When you read, understand, and reflect the Code in your decisions, you are protecting our University's good reputation and demonstrating our University values. If you have any doubts or questions, always ask for guidance from your supervisor or the Office of Compliance and Ethics.

Question & Answer

I can't find my copy of the Code of Conduct. How do I get a new one?

Contact your supervisor or the Office of Compliance and Ethics. The Code is also publicly available on famu.edu.

My work is very specialized and I have received training on many applicable laws and regulations. What should I pay attention to, the Code of Conduct or these specialized regulations?

You need to pay attention to both! The laws and regulations that govern your work are more detailed and therefore should be carefully applied on the job. Our Code guides your decision-making in a more generic way, but is no less important. Nothing in our Code violates the law, and vice-versa.

My job brings me into constant contact with outside vendors and suppliers. On occasion they suggest "creative" solutions that would be good deals for our University, but might be considered violations of our Code of Conduct. How do I respond to these?

Any business deal that's a violation of our Code is unacceptable, no matter how "creative" it is. Companies with whom we do business need to understand our commitment to integrity. The short-term benefits of unethical solutions never outweigh the long-term harm done to our University's reputation.

I'm in a situation that doesn't seem to be covered by any of the examples in our Code. What should I do?

If you have a question that isn't answered by our Code of Conduct, ask your supervisor. If for any reason you feel uncomfortable asking him or her about the situation, contact the Office of Compliance and Ethics.

Florida Agricultural and Mechanical University



1.019 University Code of Conduct.

As members of the Florida A&M University (University) community, all faculty, staff, students, members of the Board of Trustees, University officers and affiliates are responsible for sustaining the highest ethical standards of professional conduct and integrity for this institution, and for the broader community in which we function. We share responsibility for this institution and for its enterprises. The University's strategic plan outlines the core values we hold as essential to responsible professional behavior, which include: integrity, accountability, innovation, and inclusion. The ethical principles espoused by the Florida Code of Ethics for Public Officers and Employees in Chapter 112, Part III of the Florida Statutes (Code of Ethics), reinforce our commitment to the University's values. Therefore, adherence by trustees, officers, faculty, staff, student employees, contractors and others acting on behalf of the University to the standards set forth in this Code of Conduct is an integral part of the University's goal of attracting quality students, faculty and staff, while ensuring a safe and healthy environment for all members of the campus community. The Code of Conduct outlines behavioral standards for members of the University community and for those acting on behalf of the University.

(1) Applicability. This Code of Conduct applies to the following members of the University community: a) faculty, staff, and students who are paid for working for the University; b) Board of Trustees; c) consultants, vendors and contractors and other individuals using University resources or facilities, or receiving funds administered by the University; and d) individuals who perform services for the University as volunteers and who assert an association with the University. Any reference to members of the University community as provided in this regulation shall refer to the above

referenced persons.

(2) *Compliance with Laws and University Rules and Policies.* Per Section 1012.80, Florida Statutes, members of the University community shall comply with the applicable standards, policies, rules, regulations and state and federal laws that govern and guide their work. The University promotes ongoing and open communication at all levels of the institution. As such, administrators, supervisors and managers are responsible for supporting and monitoring compliance. Members of the University community have an obligation to report any behavior that they believe is unethical or in violation of state or federal law, regulations, or university policies. See Section 16 of this Regulation for reporting options.

(3) *Disruptive Conduct.* The University strives to maintain an environment in which members of the University community treat each other with dignity and respect. University Regulation 10.111 prohibits individuals from acting intentionally to impair, interfere with, or obstruct the orderly conduct, processes and functions of the University. This includes substantially disrupting a student's, employee's, or the University's performance, opportunities or benefits.

(4) *Conflicts of Interest and Commitment.* Faculty and staff of the University owe their primary professional allegiance to the University and its mission. The University has an obligation to internal and external stakeholders to use their resources responsibly and, where required, for designated purposes. Thus, all officers, faculty, principal investigators, staff, student employees and others acting on behalf of the University hold positions of trust, and the University expects them to carry out their responsibilities with the highest level of integrity and ethical behavior. Outside activities are defined as any employment or activities entered into in addition to an individual's employment at the University, that utilize the knowledge, skills, abilities or expertise the individual uses to carry out their University duties. Outside activities, including any interest, obligation, or relationship that could potentially be, or appear to be, in conflict with the interests of the University,

including those of immediate family members, must be disclosed to the University immediately so it can be managed appropriately. Conflicts of interest can often be managed to eliminate the risk of damage to the University, but only if they are promptly disclosed.

Failure to disclose outside activities related to an actual, apparent, or possible conflict of interest or commitment is a violation of this Regulation, as well as other applicable conflict of interest policies (including University Regulations 6.002 and 10.122) and the Florida Code of Ethics.

(5) *Political Activities.* Employees with intentions to seek election to and hold public office must notify the President or President's designee of such intentions. The President or President's designee will determine whether the employee's candidacy for holding public office will interfere with the full and faithful discharge of the employee's duties, as outlined in the University Regulation 10.123 and Section 104.31, Florida Statutes.

(6) *External Communication on Behalf of the University.* Pursuant to the University Communications Policy, the Office of Communications is the official University representative to the media and is tasked with establishing and cultivating relationships with journalists, publications and broadcast networks/channels, as well as responding to media inquiries, issuing official statements and announcements and providing guidance and leadership to the University community about relevant media guidelines and best practices. All University leaders, faculty, staff, partners, vendors and contractors must coordinate with the Office of Communications to develop and distribute news and information about the University and to participate in solicited and unsolicited media interviews or media events. Use of University logos and identity must be used in accordance with the University Style Guide and other applicable policies.

(7) *Contract Authority.* The acceptance of an agreement, including sponsored project funding, may create a legal obligation on the part of the University to comply with the terms and conditions of the agreement and applicable laws and regulations. Therefore, only individuals who have authority delegated by an appropriate University official are authorized to enter into agreements on behalf of the University. All agreements, understandings, and contracts must be reviewed by the Office of General Counsel before execution.

(8) *Confidentiality and Privacy.* The University community shall use confidential information acquired in the course of University business only for official or legal purposes, and not for personal or illegal advantage, during or after such affiliation. It is imperative that each community member complies with all state and federal laws, agreements with third parties, and University policies, regulations and procedures pertaining to the use, protection and disclosure of such information. Such policies apply even after the business relationship with the University ends.

(9) *Gifts and Entertainment.* Employees must abide by expectations outlined in University regulation, policy, and the Florida Code of Ethics regarding the solicitation or acceptance of anything of value from third parties. Members of the University community are prohibited from soliciting or accepting anything of value based on the understanding that their official position will be influenced by such a gift. Employees identified as a financial disclosure reporting individual or procurement employee have additional restrictions from donors who are lobbyists, principals, political action committees or vendors doing business with the university.

(10) Record Keeping. Employees are expected to demonstrate a commitment to transparency in the retention and management of records that have sufficient administrative, legal, fiscal, or historical value pursuant to University policy, the Public Records Law (Chapter 119, Florida Statutes), and the general records schedule published by the Florida Department of State's Division of Library and Information Services (notably, schedules GS1-SL and GS5). Records are defined as "all documents, papers, letters, maps, books, tapes, photographs, films, sound recordings, data processing software, or other material, regardless of physical form or characteristics, or means of transmission, made or received pursuant to law or ordinance or in connection with the transaction of official business by an agency." Employees are prohibited from destroying documents in violation of law or policy, in response to, or in anticipation of, an investigation, audit, or litigation.

(11) Proper Use and Protection of University Assets. The University community will strive to preserve, protect and enhance the University's assets by making prudent and effective use of University resources and property and by accurately reporting its financial condition. All funds provided for research must be spent in ways consistent with funding requirements and in compliance with guidelines on allowable costs (ie: 2 CFR Part 200 Subpart E).

(12) Misuse of Public Position. Employees may not use or attempt to use their official position or any property or resource within their trust to obtain special privilege, benefit, or exemption for themselves or others.

(13) *Fraud.* As outlined in BOT Regulation 2020-01, fraud occurs when an individual obtains something of value through willful misrepresentation, including, but not limited to, intentional misstatements or intentional omissions of amounts or disclosures in financial statements to deceive users of financial statements, theft of an entity's assets, bribery, or the use of one's position for personal enrichment through the deliberate misuse or misapplication of an organization's resources. Fraud generally means an act of deception, bribery, forgery, extortion, theft, misappropriation, false representation, conspiracy, corruption, collusion, embezzlement, or intentional concealment or the omission of material facts. Members of the University community must mitigate the risk of fraud by fulfilling their duties honestly, while immediately reporting any observed or suspected irregularities to their immediate supervisor.

University employees, consultants, vendors, or persons doing business with FAMU who have knowledge of a fraud, misappropriation, or other impropriety shall immediately notify his/her supervisor and/or the Division of Audit.

Complaints may be made anonymously. Acts of fraud, as well as the failure to report incidents in good-faith or suspected incidents of fraud, is a violation of this Regulation. Examples of fraud include, but are not limited to:

- a. Any dishonest or fraudulent act;
- b. Falsification of documents;
- c. Misappropriation of funds, supplies, or other assets;
- d. Impropriety in the handling or reporting of money or financial transactions;
- e. Destruction, removal, or inappropriate use of records, furniture, fixtures, and equipment; or,
- f. Any similar or related irregularity.

The Division of Audit has the primary responsibility for the investigation of all suspected fraudulent acts as defined above. The Division of Audit will issue reports to appropriate designated personnel detailing the findings.

(14) *Health and Safety.* Members of the University community are expected to perform their duties in accordance with applicable health and safety laws, regulations, policies, and procedures. Members are also responsible for compliance with the health, safety, and risk management program and are required to immediately report workplace/campus injuries, illnesses, and unsafe conditions to the University Department of Environmental Health and Safety and the Office of Risk Manager.

(15) *Sustainability.* We are all responsible for the continued viability of Florida A&M University and our local and regional communities. The University is committed to operating in an environmentally responsible manner, from the procurement of services to the operation of offices and facilities, and other business activities. Members of the University community must comply with all applicable environmental laws and regulations as well as commitments to sustainable practices and environmental protection outlined by the University's Sustainability Institute.

(16) *Information Technology.* Pursuant to University Regulation 5.003 (Electronic Connectivity), members of the University community play a role in safeguarding information systems by adhering to established University controls and applicable law and policy. Members do not have an expectation of privacy in the use of University computers and systems. Cyber security and systems training are required of all employees before they are permitted access to these systems. Members are prohibited from using University computers or systems in furtherance of personal or political business.

Information Technology Services tracks software vulnerabilities and applies patches as soon as they become available. To that end, users of the University network shall not:

- Undermine the security or the integrity of computing systems or networks or attempt to gain unauthorized access;

- Use any computer program or device to intercept or decode passwords or similar access control information;
- Knowingly or intentionally transmit, download, or upload any material that contains viruses, trojan horses, worms, time bombs, cancelbots, phishing, or any other harmful programs;
 - Transmit, download, or upload any material that contains software or other material protected by federal or state intellectual property laws unless the user owns or controls the rights thereto or has received all necessary consents; or
 - Use FAMU electronic connectivity for the exchange of pirated software.

(17) *Reporting Suspected Violations.*

- a. Members of the University community are required to report violations of applicable University policy, government contracts, and grant requirements, as well as state and federal laws and regulations. Prompt reporting of possible violations is required as it gives the University the opportunity to investigate the matter and take corrective action where needed. Complainants may initially report their concerns through their normal management chain of command, beginning with one's immediate supervisor. If it is inappropriate to report to the immediate supervisor, (e.g., the suspected violation is by the manager or the complainant is generally uncomfortable), individuals may go to a higher level of management within the college, department, or report directly to the Office of Compliance and Ethics, Office of General Counsel, Division of Audit, the Office of Human Resources or the Office of Equal Opportunity Programs. Managerial and supervisory personnel must maintain an open-door policy and take proactive measures to assure their staff that the institution supports a culture that values ethical behavior and compliance.

- b. Managers/Supervisors are responsible for reporting complaints received to the Office of Compliance and Ethics, either directly or through the University's Compliance and Ethics Hotline. As appropriate, the Office of Compliance and Ethics coordinates with the Division of Audit, the Office of Human Resources, the Office of Equal Opportunity Programs and other relevant areas, both internal and external. Employees are not exempt from the consequences of wrongdoing by self-reporting, although self-reporting may be considered in the determination of an appropriate course of action.
- c. Compliance and Ethics Hotline. Members of the University community may use the University Compliance and Ethics Hotline to report complaints of misconduct outlined in this Regulation. The Hotline allows reporting by phone or online, with an option for anonymous reporting.
- d. Other Reporting Avenues. While the Office of Compliance and Ethics coordinates the Compliance and Ethics Hotline, violations may also be reported internally to the offices listed above. Externally, suspected violations of state and federal laws may be reported to the Florida Board of Governors' Office of Inspector General and Director of Compliance or the State of Florida Whistleblower's Hotline.
- e. False Reports. Submitting a report that is known to be false (made in bad faith) is a violation of this Regulation and will result in discipline up to and including potential termination from employment.

(18) *Investigation.* Preliminary Review and Investigation. University offices tasked with investigation take every reported concern seriously. All concerns will be assessed through intake to determine the appropriate course of action. If an investigation is warranted, such initial investigation will be completed within a reasonable timeframe. The primary investigator will provide appropriate updates to the parties.

- a. Independence. Investigators are responsible for establishing and maintaining independence so that conclusions and recommendations are impartial in both fact and appearance. The investigator must consider

organizational, personal, and external impairments that impact the investigators' ability to perform work impartially.

- b. Confidentiality. Such reports may be made confidentially, and even anonymously. Confidentiality will be maintained to the extent legal and practicable, informing only those personnel who have a need to know such information.
- c. Cooperation. All members of the University community are expected to cooperate fully in any external or internal investigation. A copy of this Regulation will be provided to all employees.
- d. Interference. The integrity of an audit, investigation, or administrative action is vital in ensuring a fair and equitable outcome for all parties involved. Members of the University community are prohibited from impeding any audit or investigation. Examples of interference includes, but is not limited to: disclosing information inappropriately, making false statements, failing to respond timely to requests for information or tampering with evidence.
- e. Referral. Decisions to prosecute or refer the investigation results to the appropriate law enforcement and/or regulatory agencies for independent investigation will be made in conjunction with legal counsel and senior management.
- f. Investigative Reports. Despite the disposition, investigative activity will result in a written report. Reports shall be fair, objective, and present the results of investigation in a clear manner.

(19) *Retaliation.* Members of the University community are prohibited from engaging in retaliation against another for reporting compliance or ethics related concerns or participating in an investigation due to such reports. Findings of retaliation are independent of the underlying claim of violation and will result in disciplinary action, up to and including termination.

(20) *Enforcement.* Members of the University community are responsible for annually completing mandatory compliance and ethics trainings, as well as maintaining compliance with law, regulation, policy and making ethical decisions. Failure to follow the standards outlined serves as a violation of this Regulation, as well as the originating regulation/policy, if applicable. Members of the University community who violate this Regulation will be subject to personnel action, up to and including termination.

(21) *Equal Opportunity.* It is the policy of Florida A&M University that each member of the University community is permitted to work or attend class in an environment free from any form of discrimination including race, religion, color, age, disability, sex, sexual harassment, sexual orientation, gender identity, gender expression, marital status, national origin, and veteran status as prohibited by State and Federal Statutes. This commitment applies to all areas affecting students, employees, applicants for admission and applicants for employment. It is also relevant to the University's selection of contractors, suppliers of goods and services and any employment conditions and practices.

Specific Authority: Chapter 112, Part III, Florida Statutes; Section 7(c), Art. IX, Fla. Const., BOG Regulation 1.001. History–New 10-05 ; Amended 2-9-2020, 10-2022.



FLORIDA A&M UNIVERSITY

OFFICE OF COMPLIANCE AND ETHICS

UNIVERSITY COMPLIANCE AND ETHICS CHARTER

Purpose and Mission

The Office of Compliance & Ethics (OCE) provides oversight and guidance to university-wide ethics and compliance activities and fosters a culture that embeds these disciplines in all university functions and activities. OCE is designed to promote greater coordination of and consistency among individual University compliance programs, covering a wide variety of requirements related to academics, athletics, human resources, research, health care, information technology, and numerous administrative functions.

The mission of OCE is to support the University's mission and strategic plan by proactively partnering with faculty, staff and management to:

- Ensure compliance risks are identified, prioritized and managed appropriately;
- Establish a control environment, level of accountability, and ethical framework that promotes commitment to the highest standards of ethics, integrity, and lawful conduct by promoting adherence to all applicable federal, state, and local laws, regulations, as well as standards and internal policies and protocols;
- Provide general compliance training to employees and faculty and guidance to managers;
- Provide an avenue for reporting of potential non-compliance or unethical behavior, including an option to remain anonymous;
- Develop effective policies and procedures to promote compliance and ethical decision-making

Reporting Structure and Independence

In 2005, the Florida Agricultural & Mechanical University Board of Trustees (BOT) approved Resolution 14-05 adopting a university-wide compliance program as the foundation of the internal control and compliance environment. In support of the compliance program, the BOT maintains internal audit and compliance functions that serve as integral components of the governance structure.

OCE administers the University's compliance function. The Chief Compliance & Ethics Officer (CCEO) oversees and manages the unit. The CCEO reports functionally to the BOT Audit and Compliance Committee and administratively to the University President.¹ The CCEO and staff have organizational independence and objectivity to perform their responsibilities and all activities of the office shall remain free from influence.

¹ Pursuant to the Florida Board of Governors Regulation 4.003(5)

Authority

The Office of Compliance & Ethics has the authority to review or investigate allegations of misconduct in any area of the university, including schools, colleges, administrative departments, auxiliary enterprises, and support organizations. Reviews and investigations shall not be restricted or limited by management, the University President, or the Board of Trustees. Accordingly, the OCE is authorized to:

- Have unrestricted and timely access to records, data, personnel, and physical property relevant to performing compliance reviews and investigations, and to allow for appropriate oversight and guidance related to compliance, ethics, and risk mitigation efforts.
- Allocate resources, establish schedules, select subjects, determine scopes of work, and apply the techniques required to accomplish objectives;
- Obtain the timely assistance and cooperation of personnel in areas of the University where reviews and investigations are performed, as well as other specialized services from within or outside the University; and
- Have free and unrestricted access to the University President and Board of Trustees.

Documents and records obtained for the above purposes will be handled in compliance with applicable laws, regulations, and university policies and procedures. As required by law, the OCE will comply with public records requests.

The Chief Compliance and Ethics Officer will notify the appropriate divisional vice president to request remediation of any unresolved restriction or barrier imposed by any individual on the scope of any inquiry, or the failure to provide access to necessary information or people for the purposes of such inquiry. If unresolved by the appropriate vice president, the Chief Compliance and Ethics Officer will notify the President to assist in remediation. If additional remediation steps are required, the Chief Compliance and Ethics Officer will make appropriate notifications as outlined in Florida Board of Governors Regulation 4.003.

Organizational Oversight

The Board of Trustees will:

- Review the charter of the Office of Compliance & Ethics for approval. The approved charter will be reviewed at least every three years for consistency with applicable Board of Governors and university regulations, professional standards, and best practices. Subsequent changes will be submitted to the Board of Trustees for approval. A copy of the charter and any subsequent changes will be provided to the Board of Governors;
- Approve the annual Program Plan;
- Receive communications from the CCEO on the compliance activity's performance relative to its plan and other matters;
- Make appropriate inquiries of management and the Chief Compliance and Ethics Officer to determine whether there is inappropriate scope or resource limitations; and
- Ensure the Office of Compliance & Ethics has appropriate staff and resources in which to fulfill its duties and responsibilities.

Duties and Responsibilities

The duties and responsibilities of the CCEO and staff include projects and activities that fulfill the requirements for an effective compliance and ethics program as required by Chapter 8 of the Federal Sentencing Guidelines and Board of Governors Regulation 4.003. The University's compliance and ethics program contributes to an effective control environment that promotes accountability and a commitment to the highest standards of ethics, integrity, and lawful conduct. The following elements define the duties and responsibilities of the office:

1. Compliance Risk Management
 - Assisting management with the identification and prioritization of compliance risks;
 - Assisting management with the development of mandatory risk management plans for compliance high risks;
 - Ensuring that compliance high risks are being properly managed by the designated responsible parties;
 - Providing compliance advisory services to management, faculty, and staff; and,
 - Enforcing and promoting standards through appropriate incentives and disciplinary guidelines, including revising and developing of policies and procedures.
2. Monitoring and Education
 - Evaluating emerging compliance trends in higher education and government and implementing best practices;
 - Performing internal monitoring, investigations, and compliance reviews; and
 - Promoting compliance and ethics awareness through effective training and education activities.
3. Retaliation
 - Providing all employees with an opportunity to report issues of potential retaliation for the reporting of wrongdoing; and,
 - Review and investigate, as appropriate, allegations of retaliation and other applicable state and federal laws relating to retaliation that are not covered by whistleblower protection or the Office of Equal Opportunity Programs.

The Chief Compliance and Ethics Officer and staff will:

1. Provide oversight of compliance and ethics activities;
2. Work closely with Compliance Partners to assess and prioritize which compliance areas present the greatest risk and need for attention, based on regulatory environment and complexity, overlap with University strategic plans, and consequences of non-compliance;

3. Provide annual training to university employees and Board of Trustees' members regarding their responsibility and accountability for ethical conduct and compliance with applicable laws, regulations, rules, policies, and procedures.
4. Obtain an external review of the Program's design and effectiveness at least once every five years or as deemed necessary as dictated by the circumstances. The review and any recommendations for improvement will be provided to the University President and Board of Trustees. The assessment will be reviewed for approval by the Board of Trustees and a copy provided to the Board of Governors.
5. Identify and provide oversight and coordination of compliance partners responsible for compliance and ethics-related activities across campus and provide communication, training, and guidance on the Program and compliance and ethics-related matters.
6. Administer and promote the University Compliance and Ethics Hotline, a reporting mechanism available for individuals to, anonymously or not, report potential or actual misconduct and violations of university policy, regulations, or law. OCE will work to ensure that no individual faces retaliation for good faith reporting of a potential or actual violation.
7. Maintain and promote the University's Code of Conduct and ensure the policy articulates the steps for reporting and escalating matters of alleged misconduct, including criminal conduct, when there are reasonable grounds to believe such conduct has occurred.
8. Communicate routinely to the University President and the Board of Trustees regarding Program activities. Annually report on the effectiveness of the Program. The Program Plan and any revisions, based on the Chief Compliance and Ethics Officer's report, shall be reviewed and subject to approval by the Board of Trustees. A copy of the report and/or revised plan will be provided to the Board of Governors.
9. Promote and enforce the Program, in consultation with the University President and Board of Trustees, consistently through appropriate incentives and disciplinary measures to encourage a culture of compliance and ethics. Failures in compliance and ethics will be addressed through appropriate measures, including education or disciplinary action.
10. Initiate, conduct, supervise, coordinate, or refer to other appropriate offices such as inquiries, investigations, or reviews deemed appropriate in accordance with university regulations and policies, state statutes, and/or federal regulations. Submit final reports to appropriate action officials.
11. Make necessary modifications to the Program in response to detected non-compliance, unethical behavior, or criminal conduct and take steps to prevent its occurrence.
12. Assist the University in its responsibility to use reasonable efforts to exclude individuals within the University and its affiliated organizations whom it knew or should have known through the exercise of due diligence to have engaged in conduct inconsistent with an effective Program.
13. Coordinate or request compliance activity information or assistance, as necessary, from any university, federal, state, or local government entity. Oversee and coordinate

external inquiries into compliance with federal and state laws and take appropriate steps to mitigate risk of non-compliance.

14. Maintain a professional staff with sufficient size, knowledge, skills, experience, and professional certifications.
15. Utilize third-party resources as appropriate to supplement the department's efforts.
16. Perform assessments of the program and make appropriate changes and improvements.

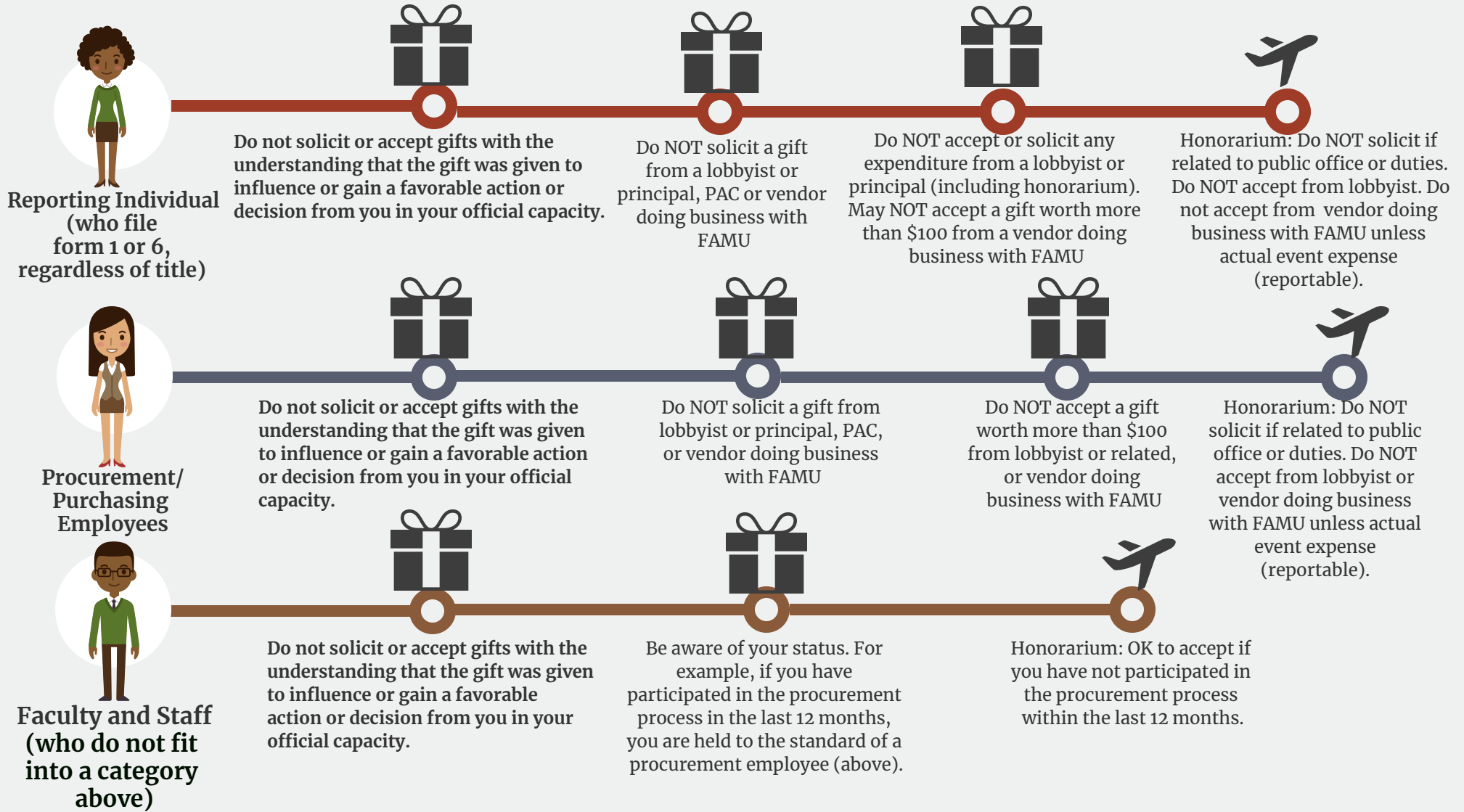
Members of the University community having responsibility for a specific area of compliance must ensure the following:

1. Oversight of compliance in their functional areas;
2. Collaboration with other University units to mitigate compliance risk, as appropriate;
3. Adherence to the University's compliance policies;
4. Implementation of corrective action as necessary, arising from compliance reviews and/or investigations;
5. Completion of self-assessments to evaluate their individual compliance efforts; and
6. Immediate notification to the Chief Compliance and Ethics Officer of any realized or suspected compliance or ethics violations.

Professional Standards

The Office of Compliance & Ethics' activities will be governed by adherence to the *Florida Code of Ethics*; the *Code of Professional Ethics for Compliance and Ethics Professionals*; and the *U.S. Federal Sentencing Guidelines'* criteria for an effective compliance program. Investigation activities will be governed by adherence to professional standards issued for the State University System.

FAMU Ethics Guide: Gifts / Journey Map



*What if you received a prohibited gift?

Immediately contact the Chief Compliance and Ethics Officer at rica.calhoun@famuedu.

*Unsure of definitions or which category you are in?

No problem. Turn the page over.

Definitions (Fla. Stat. 112.313)

Gift: Anything of value, including without limitation:

- | | |
|--|--|
| <ol style="list-style-type: none">1. Real property2. The use of real property.3. Tangible or intangible personal property.4. The use of tangible or intangible personal property.5. A preferential rate or terms on a debt, loan, goods, or services6. Forgiveness of an indebtedness.7. Transportation, other than that provided to a public officer or employee by an agency in relation to officially approved governmental business, lodging, or parking.8. Food or beverages | <ol style="list-style-type: none">9. Membership dues.10. Entrance fees, admission fees, or tickets to events, performances, or facilities.11. Plants, flowers, or floral arrangements.12. Services provided by persons pursuant to a professional license or certificate.13. Other personal services for which a fee is normally charged by the person providing the services.14. Any other similar service or thing having an attributable value not already provided for in this section. |
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“Gift” does not include: Salary, benefits, services, fees, commissions, gifts, or expenses associated primarily with your employment, business, or service as an officer or director of a corporation or organization.

Reporting individual: A university official required to complete limited or full financial disclosure forms 1 or 6 with the Florida Commission on Ethics.

Procurement Employee: any employee who, in the last 12 months, has participated in the procurement process for services and commodities in excess of \$10,000.

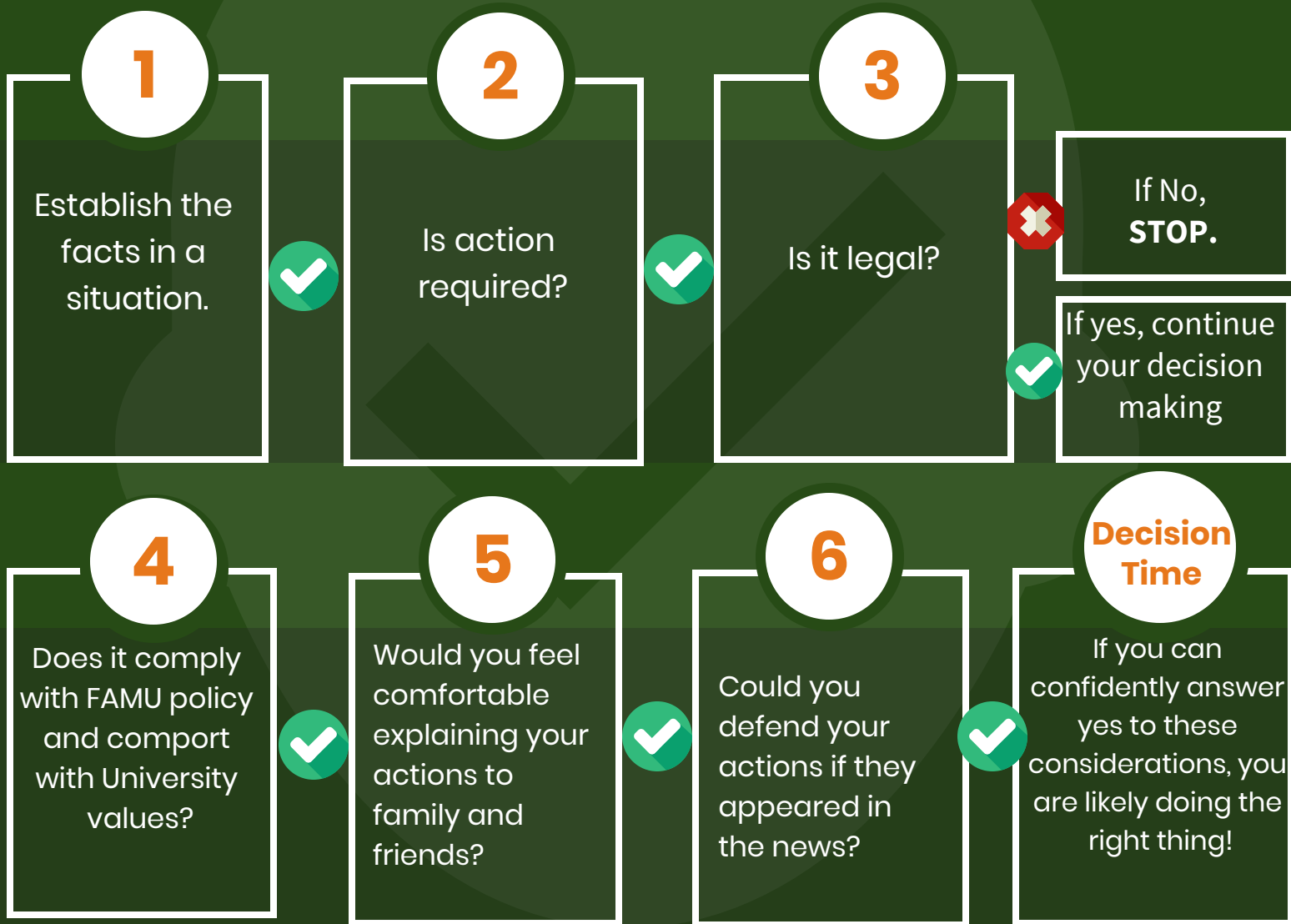
Exemptions: Gifts accepted on behalf of the University.

Public Officer includes any person elected or appointed to hold office in any agency, including any person serving on an advisory body. § 112.313, F.S.

COMPLIANCE and ETHICS: Do the Right Thing!

A Simple Guide to Ethical Decision Making

You may feel unsure about a situation and a decision, since there seem to be a number of acceptable alternatives. If you consider the following, you will likely be able to respond appropriately to the situation.



If you cannot confidently answer "yes" to all of these considerations, contact the Office of Compliance and Ethics, the Office of Human Resources, or the Office of the General Counsel for advice!

ATTENTION! This webpage is hosted on EthicsPoint's secure servers and is not part of the Florida A&M University website or intranet.



Our Commitment

The Office of Compliance and Ethics (OCE) is committed to the University's core values, including accountability, integrity, and ethics. To that end, our office takes each complaint seriously. OCE reviews for referral or investigates misconduct related to compliance and ethics, including, but not limited to, the following violations or concerns:

- **Workplace Health and Safety Violations**

To Make a Report

You may use either of the following two methods to submit a report:

- Select the **"Make a Report"** link at the top of this web page.

OR

- Dial toll-free, within the United States, Guam, Puerto Rico and Canada: **866-445-4968**

- **University Code of Conduct Violations**
- **Falsification of Financial Records, Travel or Expense Reports**
- **Legal or Regulatory Violations**
- **Misuse or Theft of University Property**
- **Research Misconduct**

Follow-Up on a Report

Report Key:

Password:

If you do not have an EthicsPoint report key and password, your organization may have recently switched service providers. Please click continue to file a follow-up.

[Continue](#)

After you complete your report you will be assigned a unique code called a "report key." Write down your report key and password and keep them in a safe place. After **5-6** business days, use your report key and password to check your report for feedback or questions.

EthicsPoint is NOT a 911 or Emergency Service:

Do not use this site to report events presenting an immediate threat to life or property. Reports submitted through this service may not receive an immediate response. If you require emergency assistance, please contact your local authorities.