



## FAMU Corrective Action Plan 2013 (as of September 2014)

Corrective Action Plan Status Summary			
Area	Issues	Completed ✓	Good Progress ●
Audit and Compliance	10	10	0
Finance	9	8	1
Academic & Accreditation	5	5	0
Facilities & Construction	2	2	0
Hazing & Student Code of Conduct	4	4	0
<b>TOTAL</b>	<b>30</b>	<b>29</b>	<b>1</b>

The Florida A&M University (FAMU) Corrective Action Plan (CAP) 2013 project was developed in January 2013 by board office staff to monitor corrective actions taken in response to the Auditor General, Inspector General, and other reviews and reports. The Plan's goal is to provide an opportunity for an accountability partnership with the University to ensure transparency and to keep the Board of Governors informed, using high-level tracking and monitoring. The University's corrective action plans are more comprehensive and granular.

### (A) Audit and Compliance Issues

FAMU Staff Contact: Rick Givens, VP of Audit and Compliance    BOT Cmte Chair: Karl White  
BOG Staff Contact: Joseph Maleszewski, Inspector General    BOG Cmte Chair: Alan Levine

<b>Legend:</b>
✓ Completed
● Good Progress
● Slow Progress
● Poor Progress

Issue	Update	Progress Indicator
<u>Compliance with Institute of Internal Auditors Standards (IIA)</u>		
(A1) Adopt new Audit Committee and Division of Audit and Compliance (DAC) Charters that conform to IIA Standards.	<b>October 2013: COMPLETED</b> Mr. Givens reported the DAC Charter was updated in accordance with new Standards and was presented for approval by the board of trustees at the October 2, 2013, meeting.  <b>May 2013: COMPLETED</b> Both charters have been approved by the university board of trustees.	✓
(A2) Revise operating procedures manual so that it complies with IIA Standards and take all necessary steps to train staff for implementation.	<b>May 2013: COMPLETED</b> Operating procedures manual adopted and implemented May 2012. It was updated and expanded in February 2013.	✓
(A3) Establish a quality assurance and improvement	<b>October 2013: COMPLETED</b> The OAR final report was issued by Ernst & Young September 17, 2013, with	

<p>program as required by IIA Standards and conduct a self-assessment following first year of operations in compliance with IIA Standards. Schedule a quality assessment review (QAR) conducted by an external auditing firm one year later.</p>	<p>an overall assessment of "Generally Conforms."</p> <p><b>August 2013:</b> Self-assessment completed and final report provided to the board office. Additionally, Ernst &amp; Young are on-site to conduct the QAR.</p> <p><b>July 2013:</b> Self-assessment in progress.</p> <p><b>June 2013:</b> Self-assessment in progress.</p> <p><b>May 2013:</b> A quality assurance and improvement program has been adopted, and a self-assessment is in progress for the Division of Audit and Compliance (DAC). An outside audit firm has been hired to assist in this process. Ernst and Young will begin the QAR in July 2013, based upon the Institute of Internal Auditors "red" book standards.</p>	<p>✓</p>
<p><b>(A4)</b> Conduct all internal audits and risk assessments in conformance with IIA Standards.</p>	<p><b>October 2013: COMPLETED</b> The QAR final report was issued September 17, 2013, and issued a "Generally Conforms" rating.</p> <p><b>August 2013:</b> Four completed internal audit reports submitted to the OIG. Additionally, Mr. Givens reported SACS is requiring his office to obtain external verification of their conformance with professional standards. Ernst &amp; Young has been retained for this purpose, and the verification process is in progress.</p> <p>Mr. Givens provided the board office with a copy of the 2013-2014 Risk Assessment and Internal Audit Plan.</p> <p><b>July 2013:</b> Audits in progress.</p> <p><b>June 2013:</b> Audits in progress.</p> <p><b>May 2013:</b> The Division of Audit and Compliance believes it is now in conformance in practice. The official "conformance with IIA Standards" language cannot be used in final audit reports until the QAR has been successfully completed.</p> <p>The DAC will have completed four internal audits by the end of June 2013, and they have completed six investigations (in accordance with "green" book standards).</p>	<p>✓</p>
<p><b>Reporting to Audit Committee and President</b></p>		
<p><b>(A5)</b> Ensure that annual performance reports are presented to the Audit Committee and President on the DAC's effectiveness, staff proficiency and productivity, including results of self-assessment referenced above and results of subsequent QAR.</p>	<p><b>October 2013: COMPLETED</b> Mr. Givens indicated that the DAC reports even more regularly than annually: the DAC reports quarterly to the board of trustees. Reports include an overview of DAC projects, audit follow-ups and risk ratings, and brief description of investigations. The final report of the QAR was presented to the board of trustees at its October 2, 2013, meeting.</p> <p><b>August 2013:</b> New format was used to report to the audit committee the status and findings of the self-assessment (fieldwork complete; final report pending) and the QAR (in progress and due to be completed by mid-September 2013).</p> <p><b>July 2013:</b> Copies received of new format. Awaiting audit committee's August meeting to debut new format.</p>	<p>✓</p>

	<p><b>June 2013:</b> The new format is ready for presentation to and approval by the university's audit committee. Mr. Givens will send copies of new format to this office.</p> <p><b>May 2013:</b> The format to be used in annual performance reporting has been developed but not yet approved by the university board of trustees. Reports are made to the audit committee at each meeting. Copies of audit reports are provided to each board member. Annual performance reports will be presented to the board beginning in 2013-2014.</p>	
(A6) Submit annual audit plan based on risk assessment results to Audit Committee and President, together with a budget that provides sufficient resources to address high risk areas in a timely manner.	<p><b>September 2014: COMPLETED</b> Annual Audit Plan submitted to the board of trustees at its September 10, 2014, meeting.</p> <p><b>May 2013: COMPLETED</b> The 2013-2014 Annual Audit Plan was approved at the university board of trustees meeting June 6, 2013.</p>	✓
(A7) Implement a project timekeeping system and ensure that DAC staff receives appropriate training.	<p><b>October 2013: COMPLETED</b> Mr. Givens confirmed he and his staff are continuing to use the simple Excel spreadsheet for time-keeping. Eventually, they will look for a more robust, automated time-keeping system now that they are fully staffed.</p> <p><b>August 2013:</b> The DAC has created and begun using, as of July 1, 2013, a simple Excel spreadsheet for each employee to keep his/her time.</p> <p><b>July 2013:</b> The DAC continues to search for a simple, easy-to-use time-keeping system as they cannot reach Audit Leverage (the purchased software that was never set-up) for implementation and set-up.</p> <p><b>June 2013:</b> Mr. Givens stated his office is considering the free audit program application, IIAMS, developed by the Department of Children and Families.</p> <p><b>May 2013:</b> A time-keeping system (time sheets) was implemented in January 2013, but there is no system in which to input the information.</p>	✓
(A8) Increase level of involvement with the Enterprise Information Technology (EIT) function and review external assessments of EIT function to better identify risks, and to keep Audit Committee and President informed of risks and actions being taken to reduce risk.	<p><b>February 27, 2014: COMPLETED</b> Mr. Givens reported the newly hired IT auditor began January 27, 2014. He is beginning an IT audit now and will participate in the annual risk assessment.</p> <p><b>December 2013:</b> Mr. Givens reported the DAC has completed interviews for the IT auditor position and that they plan to make a decision very soon. The chosen candidate will likely begin in early January.</p> <p><b>October 2013:</b> The DAC staff IT auditor recently resigned, which will slightly delay the progress they had expected for their IT audits this year. Mr. Givens reported and they will hire a replacement in the near future. A committee has been established to review the applications and interviews will be set up in the near future.</p> <p><b>August 2013:</b> FAMU extended the deadline to the EIT staff for submitting responses to the Risk assessment regarding application controls. Givens confirmed he has a new staff member, as of November 2012, who is a Certified Information Systems Auditor. Two internal audits are planned this fiscal year for IT audits.</p>	✓

	<p><b>July 2013:</b> EIT staff continues to work on responses to the Risk Assessment.</p> <p><b>June 2013:</b> Risk assessment of application controls begun with the EIT staff.</p> <p><b>May 2013:</b> Because this is a high risk area, the DAC has added audits in the IT activity to their 2013-2014 Work Plan. Additionally, the DAC added a Certified Information Systems Auditor to their staff in fall 2012.</p>	
<b>Investigations</b>		
<p><b>(A9)</b> Establish procedures for conducting internal investigations and train staff on new procedures. Include a mechanism for centralized tracking of complaints.</p>	<p><b>August 2014: COMPLETED</b> Mr. Givens provided an update regarding staff training. As previously reported, Mr. Givens has implemented a centralized tracking system for complaints and implemented internal procedures for conducting investigations. The self-assessment reference in the February 27, 2014, update below is ongoing at this time and is expected to be completed by September 30, 2014.</p> <p><b>February 27, 2014:</b> Mr. Givens reported that Ernst &amp; Young has completed their work with the DAC. The DAC peer review confirmed they are conducting investigations in compliance with Green Book standards and that their materials are up-to-date. Mr. Givens indicated they will conduct a self-assessment by the end of this fiscal year.</p> <p><b>December 2013:</b> Mr. Givens reported that DAC staff have recently undergone training for conducting investigations and using the new forms they have created. Due to the heavy load for investigations at this time, all staff are putting the forms and training to use.</p> <p>In the November 19, 2013, Ernst &amp; Young released its final report on the DAC's previous internal audits and follow-up. As of November 15, 2013, five of the nine internal audit reports conducted previously by the DAC had no open findings. Four of the nine internal audit reports had at least half or almost all findings still open (refer to the "Findings Disposition Dashboard" in the Executive Summary of the November 2013 report).</p> <p><b>October 2013:</b> Ernst &amp; Young has completed the preliminary report of their review of the DAC's conformance with Green Book standards for conducting investigations. The final report will be released after management's response is issued. The DAC is using Global Compliance for intake and tracking of complaints. Mr. Givens said they have provided informal training for all staff. Mr. Givens indicated that staff training on operating procedures will be formalized and evidenced by agendas and sign-in sheets which will be submitted to the board office.</p> <p><b>August 2013:</b> Mr. Givens reported that SACS is requiring external verification of their staff's conformance with professional standards for conducting investigations. Ernst &amp; Young have been retained for this purpose and are reviewing the completed investigations. The verification report/letter should be issued by mid-September 2013.</p> <p><b>July 2013:</b> The six investigations Mr. Givens referred to in May and June 2013 are nearly complete</p> <p><b>June 2013:</b> Investigations in progress.</p>	<p>✓</p>

	<p><b>May 2013:</b> The DAC has designated a new professional staff member as an investigator. Investigations will be conducted in accordance with the AIG Green Book standards. Six investigations have been conducted this year in accordance with the standards.</p> <p>Additionally, the Global Compliance Hotline is being used to intake and track all complaints, regardless of their origin (phone, email, hotline, etc.).</p>	
<p><b>(A10)</b> Conduct a self-assessment of DAC's compliance with the new procedures and report results to Audit Committee and President after the first year of conducting investigations under the new procedures.</p>	<p><b>October 2013: COMPLETED</b> The self-assessment has been completed and presented to the board of trustees at its August 8, 2013, meeting.</p> <p><b>August 2013:</b> Mr. Givens stated the self-assessment final report was issued and provided the board office with a copy.</p> <p><b>July 2013:</b> Self-assessment fieldwork completed at the end of this month. Final report pending.</p> <p><b>June 2013:</b> Self-assessment in progress. Kaye Kendrick of Kaye Kendrick Enterprises is conducting the self-assessment.</p> <p><b>May 2013:</b> The DAC's self-assessment is in progress. An outside audit firm has been retained to assist.</p>	<p>✓</p>

## **(B) Finance**

FAMU Contact: Joseph Bakker, Interim CFO  
BOG Contact: Tim Jones, CFO

BOT Cmte Chair: Rufus Montgomery  
BOG Cmte Chair: Tom Kuntz

Issue	Update	Status
<b><u>Banking</u></b>		
<p><b>(B1)</b> Reconcile bank accounts by the 20<sup>th</sup> of each month, and reconciliations need to be reviewed and certified by the FAMU Comptroller and sent electronically to the board office.</p>	<p><b>August 2014: COMPLETED</b> The Reconciliations and Quality Assurance section of the Office of Controller is responsible for performing monthly bank reconciliations of all University's bank accounts, including Operating, Payroll, Student, and Research accounts to External parties relating to bank accounts.</p> <p>A review of reconciliations for the past year confirms that reconciliations are being timely performed and reviewed.</p> <p><b>October 2013:</b> Copies of the July and August reconciliations have been provided to the board office.</p> <p><b>August 2013:</b> Copies of May and June reconciliations have been provided to the board office.</p> <p><b>June 2013:</b> Copies of the April reconciliation have been provided to the board office.</p> <p><b>May 2013:</b> The reconciliation process began in February 2013. Copies of the March 2013 reconciliation were provided to the board office and future reconciliations will continue to be provided. FAMU's plan is to reconcile by the 20<sup>th</sup> of the following month.</p>	<p>✓</p>
<p><b>(B2)</b> Review accounting regulations and procedures over bank deposits and outstanding checks and provide proposed enhancements to the board office for review. Such review should include consideration of best practices at other SUS institutions.</p>	<p><b>August 2014: COMPLETED</b> No change from prior status update.</p> <p><b>August 2013: COMPLETED</b> Procedures have been completed. Review of best practices at SUS institutions is completed. Revised practices emulate reviewed best practices.</p> <p><b>June 2013:</b> Procedures are on track to be completed by the end of June 2013. Best practices from other SUS institutions are ongoing.</p> <p><b>May 2013:</b> Reconciliation procedures have been provided. Procedures regarding bank deposits, outstanding checks and proposed enhancements will be provided. Final approval of draft regulations should be completed by the end of June 2013. Best practices from other SUS institutions still need to be gathered.</p>	<p>✓</p>
<b><u>Revenue Collection/Athletic Department</u></b>		
<p><b>(B3)</b> Maintain adequate documentation to verify revenues collected for football games and ensure segregation of duties such as between collection, deposits, journal entries, and reconciliations.</p>	<p><b>September 2014: COMPLETED</b> We reviewed the Year-to-Date collected revenues for football games to ensure segregation of duties as stated left. We interviewed Mary Adams (Assistant Director of Intercollegiate Athletics) and Michael Smith (Associate Athletics Director) regarding these procedures, which appear to be in place and functioning as intended.</p> <p><b>October 2013:</b> Documentation is being maintained and revenue collection procedures ensure segregation of duties between collection, deposits, journal entries,</p>	<p>✓</p>

	<p>and reconciliations. The status of reconciliations is included in the status for B4 below.</p> <p><b>September 2013:</b> July 2013 reconciliation has been provided to the board office. The August 2013 reconciliation is 98% complete and the September 2013 reconciliation is in progress.</p> <p><b>August 2013:</b> Reconciliation by categories up-to-date; Consolidated reconciliation to be up-to-date by August 30, 2013.</p> <p><b>July 2013:</b> A consolidated reconciliation through March 2013 is 90% complete; Subsequent months will be reconciled prior to July 31, 2013.</p> <p><b>June 2013:</b> No change in status.</p> <p><b>May 2013:</b> Written procedures and formal reconciliations have been implemented and will be conducted monthly. Procedures will be provided to the board office.</p>	
<p><b>(B4)</b> Reconcile revenues recorded on the General Ledger by the Cashier's office to the revenue journal entries prepared by the Athletics Department.</p>	<p><b>September 2014: COMPLETED</b> The Intercollegiate Athletics Program has developed Business Office Internal Policies and Procedures for athletic revenue collections and bank deposits. These include monthly deposit reconciliation procedures.</p> <p>In addition to procedures, the university provided copies of the 2013-2014 year end reconciliation of receipts with the general ledger by 13 different categories. These reconciliations demonstrate that the receipts reconcile to the general ledger.</p> <p>We interviewed Mary Adams (Assistant Director of Intercollegiate Athletics) and Michael Smith (Associate Athletics Director) regarding these procedures, which appear to be in place and functioning as intended.</p> <p><b>October 2013:</b> August and September 2013 reconciliations have been completed; October 2013 reconciliation is in progress and is on schedule to be completed by November 28, 2013.</p> <p><b>September 2013:</b> July 2013 reconciliation has been provided to the board office. The August 2013 reconciliation is 98% complete and the September 2013 reconciliation is in progress.</p> <p><b>August 2013:</b> Reconciliation by categories is up-to-date. Consolidated reconciliation to be up-to-date by August 30, 2013.</p> <p><b>June 2013:</b> No change in status.</p> <p><b>May 2013:</b> Written procedures and formal reconciliations have been implemented and will be completed by the 28<sup>th</sup> of each month. Procedures will be provided to the board office.</p>	<p>✓</p>
<p><b>(B5)</b> Review Sodexo concessions contract and determine reason for lack of revenue generation. Take all reasonable steps to increase revenue generation under the contract.</p>	<p><b>August 2014: COMPLETED</b> The University has contracted with a new dining services operator, Metz Culinary Management. The process included two solicitations. The Division of Audit and Compliance performed an Agreed-Upon Procedures review of the second solicitation (Request for Proposal 0031-2013) to inform the Audit Committee of the advertisement, proposal evaluation, and selection processes. The second solicitation resulted in the selection of Metz Culinary Management.</p>	<p>✓</p>

	<p>The current contract has been in place since January 2, 2014, and FAMU staff has indicated that this contract is more advantageous to the University.</p> <p><b>May 2013: COMPLETED</b> Contract has been renegotiated retroactively to July 2012. Athletics will receive 25% commission. Contract has been provided to the board office.</p>	
<p><b>(B6)</b> Prepare report of operating expenses of Athletics Department and cost-saving mechanisms that can be used to reduce deficit in the auxiliary enterprise account for intercollegiate athletics. Present report to the board of trustees and President for consideration. Amend Five-Year Deficit Reduction Plan to implement appropriate cost-saving mechanisms.</p>	<p><b>August 2014: ONGOING</b> The Auditor General's Operational Audit (Report 2014-108) issued in February 2014 disclosed that the University's intercollegiate athletic programs continued to experience cash deficits for the 2012-13 fiscal year. Although University personnel prepared a Five-Year Deficit Reduction Plan to eliminate the cash deficits, the Plan did not adequately address eliminating the cash deficit of the intercollegiate athletic programs auxiliary enterprise fund. The Auditor General recommended that the Board of Trustees should continue to monitor its intercollegiate athletic programs and implement an effective deficit reduction plan to ensure that its intercollegiate athletic programs are self-supporting.</p> <p>As a result of this audit finding the Board of Trustees considered the matter and a revised deficit reduction plan is scheduled to be developed by September 30, 2014. The status of implementation will be presented to the Board of Trustees quarterly.</p> <p><b>August 2013:</b> Deficit plan completed and approved by the board of trustees on August 8, 2013.</p> <p><b>June 2013:</b> The deficit reduction plan was not presented for approval by the board of trustees at the June 2013 meeting. The amended plan is expected to be completed by the end of July 2013.</p> <p><b>May 2013:</b> A deficit reduction plan will be presented for approval by the board of trustees at its June 2013 meeting.</p>	●
<b>Travel Reimbursement</b>		
<p><b>(B7)</b> Review internal controls relating to travel reimbursement.</p>	<p><b>August 2014: COMPLETED</b> The Auditor General's Operational Audit (Report 2014-108) issued in February 2014 disclosed, that while they "tested travel expenses to determine whether the travel expenses were in compliance with laws and regulations, and were reasonable, adequately supported, and for a valid University purpose," they had no travel-related findings.</p> <p><b>October 2013:</b> The Division of Audit and Compliance will complete its management response to the Ernst and Young Report by November 1, 2013. The final report will be issued subsequent to that response.</p> <p><b>September 2013:</b> Draft final report submitted by Ernst and Young. The report is being reviewed by the FAMU Division of Audit and Compliance.</p> <p><b>August 2013:</b> Discussions and meetings have been held with Ernst and Young. Final report to be submitted.</p> <p><b>June 2013:</b> Ernst and Young has completed its review but has not disclosed its findings.</p> <p><b>May 2013:</b> Procedures have been developed. Ernst and Young is currently preparing a review of these procedures and will release findings in June or July 2013.</p>	✓



<b>Expenditure of Student Fees</b>		
<p><b>(B8)</b> Establish procedures to ensure that tuition differential fees are expended in accordance with law, board regulations, and plans as presented to the Board of Governors.</p>	<p><b>August 2014: COMPLETED</b> The Auditor General's Operational Audit (Report 2014-108) issued in February 2014 disclosed, that while they "reviewed payments from tuition differential fees collected to determine whether the University assessed and used tuition differential fees in compliance with Section 1009.24(16)(a), Florida Statutes," they had no tuition differential fee-related findings.</p> <p><b>August 2013: COMPLETED</b> Final procedures completed and being implemented.</p> <p><b>June 2013:</b> No change in status.</p> <p><b>May 2013:</b> Draft procedures have been prepared and will be finalized by the end of June 2013. Procedures have been provided to the board office.</p>	<p>✓</p>
<p><b>(B9)</b> Establish procedures to ensure that projects being financed by the technology fee are monitored and compared to the project budgets.</p>	<p><b>August 2013: COMPLETED</b> Final procedures are being implemented.</p> <p><b>June 2013:</b> No change in status.</p> <p><b>May 2013:</b> Draft procedures have been prepared and will be finalized by the end of June 2013. Procedures have been provided to the board office.</p>	<p>✓</p>
<p><b>Supplementary Information</b></p>	<p><b>August 2014:</b> The Auditor General's Financial Audit for the fiscal year ended June 30, 2013, (Report 2014-178) was issued in March 2014. This audit disclosed that the University's basic financial statements were presented fairly, in all material respects, in accordance with prescribed financial reporting standards. The audit did not identify any deficiencies in internal control over financial reporting that were considered to be material weaknesses. The results of Auditor General tests disclosed no instances of noncompliance or other matters that are required to be reported under Government Auditing Standards, issued by the Comptroller General of the United States.</p> <p>This report marks the 7<sup>th</sup> consecutive Financial Audit with no adverse audit findings for the university. The last Financial Audit with findings was Report No. 2008-016 published in September 2007 and covering through the Fiscal Year End June 30, 2006.</p>	

## (C) Academics and Accreditation

FAMU Contact: Dr. Rodner Wright, Interim Provost  
BOG Contact: Dr. Jan Ignash, Vice Chancellor

BOT Cmte Chair: Marjorie Turnbull  
BOG Cmte Chair: Norm Tripp

Issue	Update	Status
<u>Compliance with SACS Standards</u>		
<p>(C1) Provide SACS with evidence of compliance with the standards identified in SACS letter dated January 15, 2013.</p>	<p><b>August 2014: COMPLETED</b> On January 13, 2014, the SACS Commission on Colleges formally informed Interim President Robinson and Chair Badger of their determination to remove FAMU from probation.</p> <p><b>October 2013:</b> SACS conducted an on-site visit to FAMU in September 2013 and issued their "Report of the Special Committee." Final action on the accreditation status of the institution rests with the Commission on Colleges who expects to make a determination at their December 2013 meeting.</p> <p>Ernst &amp; Young as well as Accretive Solutions have evaluated FAMU P-card transactions and their reports will be issued in the near future.</p> <p><b>May 2013:</b> Actions taken to-date by FAMU to ensure compliance with <i>Principle 1.1, Integrity:</i></p> <ul style="list-style-type: none"> <li>• Hired a Vice President for Audit and Compliance in June 2012 with 22 years of auditing experience.</li> <li>• Hired Ernst &amp; Young to perform an audit of eight of the 15 incomplete audits identified in the Sniffen &amp; Spellman report. Subsequently developed and implemented corrective actions to address each of the findings contained in the Ernst &amp; Young report.</li> <li>• Hired Ernst &amp; Young to conduct an Audit Training Workshop for members of the University board of trustees Audit Committee at the February 2013 board of trustees meeting.</li> <li>• Developed enhanced procedures governing oversight of the Division of Audit and Compliance by the University board of trustees.</li> <li>• Updated internal operating procedures to enhance the Division's ongoing compliance with established best practices and standards of the Institute of Internal Auditors.</li> <li>• Conducting searches to fill vacant staff positions within the Division.</li> <li>• Planning to conduct a quality assessment review for the Division of Audit and Compliance.</li> </ul> <p>Actions taken to-date by FAMU to ensure compliance with C.S. 3.2.8: <i>The institution has qualified administrative and academic officers with the experience and competence to lead the institution.</i></p> <ul style="list-style-type: none"> <li>• Hired a Vice President for Audit and Compliance.</li> <li>• Hired a Special Assistant for Anti-Hazing.</li> <li>• Hired a Director of Judicial Affairs.</li> <li>• Hired a Music Compliance Officer.</li> <li>• Hired a Director of Bands.</li> <li>• Conducting a search for the Chief of Police position.</li> <li>• Documenting qualifications of all individuals in key leadership positions.</li> </ul> <p>Actions Taken to Ensure Compliance with C.S. 3.10.3: <i>The institution exercises appropriate control over its financial resources.</i></p> <ul style="list-style-type: none"> <li>• Enhanced procedures governing group travel.</li> </ul>	<p>✓</p>

	<ul style="list-style-type: none"> <li>• Enhanced procedures governing use of university purchase cards (P-Card).</li> <li>• Revised the processes governing the issuance of funds to travelers.</li> <li>• Enhanced the processes governing non-employee travel.</li> <li>• Enhanced the travel reimbursement process and implemented procedures to address the reconciliation process of group travel funds.</li> <li>• Implemented an enhanced process for approval of travel by members of the Department of Music and the band.</li> <li>• Addressing findings in Operational Audit, Ernst &amp; Young Report, FDLE Report.</li> </ul> <p>Actions Taken to Ensure Compliance with C.S. 3.11.1: <i>The institution takes reasonable steps to provide a healthy, safe and secure environment for all members of the campus community.</i></p> <ul style="list-style-type: none"> <li>• Revised the board of trustees Anti-Hazing Policy.</li> <li>• Revising Student Code of Conduct.</li> <li>• Addressing recommendations from the board office Report.</li> <li>• Implemented enhanced procedures for reporting and investigating hazing allegations.</li> <li>• Created new positions: Special Assistant for Anti-Hazing (filled), Music Compliance Officer, Director of Judicial Affairs (filled), and the Coordinator of Judicial Affairs.</li> <li>• Suspended the Marching Band through at least the 2012-13 academic year.</li> <li>• Launched a new anti-hazing website (StopHazingatFAMU.com).</li> <li>• Implemented a University Directive requiring that all allegations and criminal activity be immediately brought to the President's attention.</li> <li>• 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.</li> <li>• Enhanced the membership intake process for clubs and organizations.</li> <li>• Implemented a revised organizational structure in the Department of Music.</li> <li>• Enhanced the criteria for future membership and participation in band and student organizations.</li> </ul>	
<p>(C2) Provide a report to the board of trustees and the board office regarding implementation of academic goals established in FAMU's revised work plan.</p>	<p><b>August 2014: COMPLETED</b>  On June 17, 2014, President Mangum presented the FAMU 2014-2015 University Work Plan for Board of Governor consideration. The Board of Governors voted to accept these plans as presented.</p> <p><b>September 2013:</b> In a September 2013 update, FAMU reported the following:</p> <ul style="list-style-type: none"> <li>• Preliminary numbers indicate 180 profile admits out of 1,006 first time in college freshmen.</li> <li>• Two developmental education/counselor positions have been advertised and closed on August 30, 2013.</li> <li>• The Office of University Retention hired an advisory/counselor in August 2013 to work specifically with profile admits.</li> <li>• There are 33 full-time advisors. The Office of University Retention has eliminated all part-time advisor positions.</li> <li>• In August 2013, the responsibility for providing advisement for student-athletes was transferred to the Office of University Retention. Currently there are 3 athletics advisor/counselor positions to assist in the Academic Progress Rate of student-athletes.</li> <li>• The training and development program for academic advisors will be held in October 2013.</li> <li>• Fifteen sections of the First Year Experience were offered in summer 2013, and 19 sections were offered in fall 2013.</li> <li>• A mandatory tutor workshop for all tutors will be held in September 2013.</li> <li>• A 10-hour tutorial lab requirement for freshmen profile admits was implemented in</li> </ul>	<p style="text-align: center;">✓</p>

	<p>summer 2013.</p> <ul style="list-style-type: none"> <li>• In August 2013, the responsibility for providing tutorial services for student-athletes was transferred to the Office of University Retention. The Office of University Retention will hire five tutors and a tutorial lab coordinator to assist in improving the Academic Progress Rate of student-athletes.</li> <li>• The Black Board system will now be utilized to monitor and track student usage of tutorial services and course passage rates.</li> <li>• A Black Board Analytics demonstration was provided for faculty during the Faculty Planning Conference in August 2013. Additional Black Board Analytics training sessions were presented by the Instructional Media Center.</li> <li>• The Academic Success Course curriculum is currently being developed with faculty input. The course will be offered in Spring 2014.</li> <li>• The Career Development curriculum has been developed with faculty input. Five course sections are currently being offered (Fall 2013).</li> </ul> <p><b>May 2013:</b> FAMU submitted a status report regarding implementation of academic goals established in FAMU's revised Work Plan. On that same date, FAMU provided answers to 17 discrete "yes/no" implementation questions raised by the board office's Academic and Student Affairs.</p>	
<p><b>(C3)</b> Provide to the board office a copy of all university correspondence with the Southern Association of Colleges and Schools (SACS).</p>	<p><b>August 2014: COMPLETED</b> On January 13, 2014, the SACS Commission on Colleges formally informed Interim President Robinson and Chair Badger of their determination to remove FAMU from probation.</p> <p><b>October 2013:</b> SACS Commission on Colleges <b>Report of the Special Committee</b> was submitted to the board office October 16, 2013. The Special Committee acknowledged the university's progress and had no recommendations.</p> <p><b>April 2013:</b> FAMU submitted a First Monitoring Report to SACS on standard F.R. 4.7 (Title IV program responsibilities). A copy of the report was provided to the chancellor's office.</p>	<p>✓</p>
<p><b>(C4)</b> Provide a plan to the board of trustees and the board office regarding how the university will address Law School accreditation concerns raised by the American Bar Association.</p>	<p><b>August 2014: COMPLETED</b> On June 8, 2014, the American Bar Association formally informed President Mangum and Dean Pernel of the June decision of the Accreditation Committee. The Committee report concluded that the FAMU College of Law remains on the list of law schools approved by the American Bar Association.</p> <p><b>May 2013:</b> The most recent reporting of passage rates on the Bar examination indicates that FAMU is making progress. Other SACS concerns (ex., faculty research productivity) may need to be further addressed.</p>	<p>✓</p>
<p><b>(C5)</b> Provide a plan to the board of trustees and the board office regarding how the university will address IT and data management findings in the Auditor General report.</p>	<p><b>August 2014: COMPLETED</b> The Auditor General's Operational Audit (Report 2014-108) issued in February 2014 disclosed, that while they evaluated the following areas, they did not report any related adverse finding.</p> <ul style="list-style-type: none"> <li>• Information technology (IT) access privileges and separation of duties;</li> <li>• IT data loss prevention; and</li> <li>• IT logical access controls and user authentication</li> </ul> <p><b>May 2013:</b> <u>Access Privileges</u> The Office of Enterprise Information Technology is working with the various HR and Financial offices to remove access privileges which permitted employees to perform incompatible duties or were not necessary for their responsibilities. Access review</p>	<p>✓</p>

	<p>requires detailed analysis of PeopleSoft roles and permissions lists.</p> <p>FAMU is also developing a PeopleSoft utility which will require all managers to perform an annual review of the access privileges of the employees who directly report to them. Managers will be required to verify that each employee listed is still employed at the university, and that their roles have not changed.</p> <p><u>Security Controls</u></p> <p>FAMU has evaluated the security controls which have been recommended to be changed, to insure that they will have minimum to moderate impact to the University Community, the implementation will be in two phases. FAMU plans to complete these changes by the end of June 2013 following completion of other concurrent upgrades sharing the same infrastructure.</p> <p>The security changes taking place will be communicated to the FAMU community through email advisories.</p>	
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## **(D) Facilities and Construction**

**FAMU Contact:** Joseph Bakker, Assoc. VP. Construction  
**BOG Contact:** Chris Kinsley, Director of Finance and Facilities  
 Ken Ogletree, Board Architect

**BOT Cmte Chair:** Spurgeon McWilliams  
**BOG Cmte Chair:** H. Wayne Huizenga, Jr.

Issue	Update	Status
<b><u>Procurement Process &amp; Contract Negotiations</u></b>		
<p><b>(D1)</b> Prohibit the use of design-build contracts until such time as FAMU implements improved procedures relating to the procurement of goods and services contracts for construction projects, including design-build services.</p>	<p><b>August 2014: COMPLETED</b>            Currently, FAMU is not utilizing design-build contracts. However, the university has developed and implemented a Project Managers Procedures Manual and Professional Service Guide, which include coverage of design-build services.</p> <p><b>October 2013:</b> At the current time, FAMU is not utilizing design-build contracts. FAMU's use of design-build contracts is contingent upon satisfying the board office that improved design-build procedures have been implemented to provide proper control and assurance.</p> <p><b>August 2013:</b> No change in status.</p> <p><b>June 2013:</b> No change in status.</p> <p><b>May 2013:</b> No formal action is being contemplated as there are no current or proposed design-build contracts.</p>	<p>✓</p>
<b><u>Monitoring Construction Projects</u></b>		
<p><b>(D2)</b> Enhance procedures for monitoring construction payment requests, insurance requirements for design professionals, and for verifying contractor and subcontractor licensure status.</p>	<p><b>August 2014: COMPLETED</b>            The enhanced procedure for monitoring construction payment requests, insurance requirements for design professionals and for verifying contractor and subcontractor licensure status have been developed and implemented.</p> <p>Staffing for the Department of Facilities Planning and Construction has been supplemented; a Project Manager vacancy is currently in the process of being filled; and a Technician who recently attained his degree is being promoted to a position of greater responsibility. The Director position is filled with an interim appointment with significant relevant experience and the university expects to find a permanent department leader within the year.</p> <p>To ensure the consistent use and application of updated procedures, the Department of Facilities Planning and Construction has implemented a peer review process for project management. They have also held routine meetings to evaluate the effectiveness of the project monitoring procedures and checklists and to consistently enhance these processes.</p> <p>External reviews of construction projects by the Division of Audit and Compliance are ongoing and will review relevant information to either confirm processes are working as intended or to identify areas for improvement.</p> <p>These corrective actions, in combination, are designed to enhance the Department of Facilities Planning and Construction's capacity, knowledge, skills and proficiency to plan, deliver and maintain facilities in support of the university.</p>	<p>✓</p>

	<p><b>August 2013: COMPLETED</b> Reports completed and new procedures being implemented. Two new staff added to construction management team.</p> <p><b>June 2013:</b> The drafts of the Procedures Manuals have been completed. At its June 2013 meeting, the board of trustees authorized the President to approve the manuals subject to final review by a registered Architect/Engineer and the General Counsel's Office. The reviews are expected to be completed by June 30, 2013. Mandatory training will immediately follow approval of the manuals.</p> <p><b>May 2013:</b> Alinea Capital Partners, LLC is still under contract by FAMU. The most recent reports have been provided to the board office. However, while board staff has communicated with both Alinea Capital Partners, LLC and FAMU, a comprehensive approach to correction of this item is still being developed. A key issue is that while procedures are in place, current staffing levels do not allow for full implementation of necessary procedures. FAMU appears to be working on addressing these human resource issues. Draft reports (legal review to be done) of (a) the <i>Project Manager's Manual</i>; and (b) the <i>Service Guide for Design and Construction Professionals</i> have been provided to staff. The final draft of the <i>Design Standards for Consultants</i> will be available the week of May 20, 2013. These will be presented to the board of trustees in June 2013 with the recommendation that the President implement these reports.</p>	
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## (E) Hazing and Student Code of Conduct

FAMU Contact: Dr. William Hudson, VP for Student Affairs  
Bryan Smith, Special Assistant to the President

BOT Cmte Chair: Torey Alston

BOG Contact: Dr. Jan Ignash, Vice Chancellor

BOG Cmte Chair: Norm Tripp

Issue	Update	Status
<b><u>Anti-Hazing Program</u></b>		
<p>(E1) Implement the anti-hazing program to ensure:</p> <ul style="list-style-type: none"> <li>(i) communication of anti-hazing policy to students and staff once per semester, and execution of anti-hazing agreements by students;</li> <li>(ii) continuation of anti-hazing prevention week events and anti-hazing website;</li> <li>(iii) completion of re-certification of all student organizations, including review of new intake procedures for members;</li> <li>(iv) continuation of anti-hazing instruction in the freshman studies course;</li> <li>(v) updating of the handbook and published anti-hazing policies to incorporate new procedures;</li> <li>(vi) implementation of System Anti-Hazing Best Practices, as appropriate; and</li> <li>(vii) Maintenance of 24/7 hazing reporting hotline.</li> </ul>	<p><b>August 2014: COMPLETED</b></p> <p>Mr. Bryan F. Smith is the special assistant to the president for anti-hazing and has served in this capacity since February 2013. Mr. Smith works with a compliance officer for the music department whose duties will include enforcing academic requirements for students to participate in the marching band. Under Mr. Smith's leadership, FAMU has implemented an anti-hazing program which includes:</p> <ul style="list-style-type: none"> <li>(i) communication of anti-hazing policy to students and staff once per semester, and execution of anti-hazing agreements by students;</li> <li>(ii) continuation of anti-hazing prevention week events and anti-hazing website;</li> <li>(iii) completion of re-certification of all student organizations, including review of new intake procedures for members;</li> <li>(iv) continuation of anti-hazing instruction in the freshman studies course;</li> <li>(v) updating of the handbook and published anti-hazing policies to incorporate new procedures;</li> <li>(vi) implementation of System Anti-Hazing Best Practices, as appropriate; and</li> <li>(vii) Maintenance of 24/7 hazing reporting hotline.</li> </ul> <p>An assessment of current data demonstrates that allegations of hazing increased in the first year that FAMU implemented new anti-hazing initiatives. Mr. Smith believes this reflects the increased educational and promotional aspects of the initiatives by increasing the university community's awareness of the new reporting mechanisms. In the second year, FAMU had a decrease in the number of alleged hazing incidents. Mr. Smith believes this decrease reflects that the university community received the educational and informative aspects of FAMU's hazing prevention model and that there was also a deterrent effect with the implementation of new anti-hazing policies, which discouraged some incidences of hazing.</p> <p>According to Mr. Smith, FAMU is in the process of developing improved assessment tools to better assess the effectiveness of FAMU's anti-hazing initiatives. Mr. Smith indicated that FAMU will conduct new student surveys concerning attitudes about hazing and hazing prevention and correlate survey data to prior surveys conducted on campus.</p> <p><b>December 2013:</b> Bryan Smith reported that all subparts for this item have been completed. He will provide us with evidence for each.</p> <p><b>October 2013:</b> SACS conducted an on-site visit to FAMU in September 2013 and issued their "Report of the Special Committee." This report concluded, regarding FAMU's implementation of an anti-hazing program, that the institution has taken reasonable steps to provide a healthy, safe, and secure environment. The report also concluded that:</p> <p style="padding-left: 40px;">"The institution's 'zero tolerance' policy seems to be understood by students and staff members. Evidence of enforcement is found in band eligibility data, workshop participation receipts, student organization bylaws, and by the recent suspensions of two student organizations for hazing. Processes developed for reporting, investigating, and addressing allegations of hazing</p>	<p>✓</p>



	<p>involve appropriate offices and administrators and seem to be implemented as described. The institution would benefit from making processes more systematic and better able to track all complaints from notification to resolution."</p> <p>Final action on the accreditation status of the institution rests with the Commission on Colleges who expects to make a determination at their December 2013 meeting.</p> <p>FAMU's systematic tracking of all complaints from notification to resolution is performed using the Maxient System which is currently in operation (<a href="http://www.maxient.com">http://www.maxient.com</a>). This system provides a Conduct Manager that receives incident reports via the website, tracks and manages all behavioral issues, and provides timely analytics to meet the needs of the institution. All actions are electronically tracked and regular status reports are available to the campus community. The SACS team was on campus in late September and the company's training program for campus staff occurred September 25 – October 1, 2013, so the team was unable to observe the Maxient System in operation.</p> <p><b>May 2013:</b> FAMU has communicated the anti-hazing policy to students and to the music department faculty, ROTC cadre, the university Deans, as well as all Clubs and Organizations Advisors.</p> <p>FAMU has participated in the anti-hazing prevention week and will continue to do so during the fall of 2013 and subsequent years.</p> <p>The Office of Student Activities continues to re-certify student organizations during the designated re-certification periods. The Office of Student Activities has implemented new intake procedures, and procedures were introduced to organizations prior to intake periods.</p> <p>The university will continue the anti-hazing instruction in the First Year Experience course.</p> <p>University handbooks have been updated and published to include anti-hazing policies and new procedures.</p> <p>The <i>SUS Council of Student Affairs Campus Environment Matrix: Hazing Prevention Best Practices</i> has been updated. FAMU is in compliance with all 16 SUS campus environment variables. The updated matrix will be provided during the Board of Governors meeting.</p> <p>FAMU has a "24/7 hazing reporting hotline" via its online anti-hazing website, its Campus Safety telephone number, and FAMU's collaboration with Big Bend Crime Stoppers. This collaboration was introduced to the campus community during the Black History month convocation. The telephone number and website were provided to constituents as an avenue to anonymously provide information. The caller is entitled to a reward if the information leads to a conviction.</p>	
<p><b>(E2)</b> Implement an operational plan for the Office of Judicial Affairs and Department of Public Safety to ensure:</p> <p>(i) timely referral of all alleged conduct violations to Judicial Affairs by the Department of Public Safety</p>	<p><b>August 2014: COMPLETED</b></p> <p>Mr. Bryan Smith demonstrated the Maxient Tracking system and walked us through the process flowchart demonstrating the process and communications for reported allegations of hazing. This process demonstrates a coordinated effort between various offices including the Special Assistant to the President (Anti-hazing); Office of Student Affairs; Office of Judicial Affairs; FAMU Police Department; affiliated departments (i.e., Athletics, Music, etc.); and outside entities. The tracking system and associated procedures have ensured the timely communication of hazing allegations to the appropriate parties to ensure timely investigation or follow-up.</p>	<p>✓</p>

<p>per new Department of Public Safety policy (Departmental General Order 2, Chapter 11);</p> <p>(ii) timely investigation and adjudication of all alleged conduct violations by Judicial Affairs and timely investigation of hazing allegations by Department of Public Safety;</p> <p>(iii) adequate staffing and training of Judicial Affairs personnel;</p> <p>(iv) development of a centralized data base for tracking conduct code complaints.</p>	<p>The Office of Judicial Affairs has three staff members, a director and two positions, who handle investigations and administration of the office.</p> <p><b>December 2013:</b> Bryan Smith described procedures now in place for enhanced communication and coordination between the Judicial Affairs Office, the Department of Public Safety, and his office. He also stated that training on their new tracking system had taken place in September. He confirmed that each of these items has been completed, and he will provide us with evidence.</p> <p><b>October 2013:</b> FAMU confirmed that the Maxient Tracking System is currently operational (<a href="http://www.maxient.com">http://www.maxient.com</a>). The company's training program for campus staff occurred September 25 – October 1, 2013.</p> <p><b>June 2013:</b> Coordinator of Judicial Affairs has been hired. Started May 24, 2013.</p> <p>Maxient Tracking System approved as judicial tracking software. Funding to support software approved June 2013.</p> <p><b>May 2013:</b> FAMU has coordinated the reporting process so that the timely referral of alleged conduct violations reflect the new Department of Public Safety policy.</p> <p>A Director of Judicial Affairs was hired (February 1, 2013) and the additional staffing is expected.</p> <p>A student code of conduct reporting software has been selected and is expected to be online June 2013.</p>	
<p><b>(E3)</b> Present an annual update on the Anti-Hazing Program to the FAMU board of trustees and Board of Governors Academic and Student Affairs Committee.</p>	<p><b>August 2014: COMPLETED</b></p> <p>University staff has annually provided an update on the Anti-Hazing Program to the FAMU Board of Trustees. The last update was provided on June 4, 2014, during the Student Affairs update and included a historical review of hazing allegations by area, type and status as well as summarizing current anti-hazing initiatives and activities which include:</p> <ul style="list-style-type: none"> <li>• Continuing the positive reporting of the university's anti-hazing initiatives through multiple media interviews and at anti-hazing symposiums.</li> <li>• Continuing the educational components of the anti-hazing mission by speaking to the local school district; facilitating an anti-hazing seminar to rising juniors and graduating seniors at FAMU's Developmental Research School; continuing with presentations at the FAMU new employee orientations; and providing anti-hazing information for the clubs/organizations intake workshops.</li> <li>• Noting a decrease in reported allegations of hazing during the Spring 2014 Semester compared to the Spring 2013 Semester.</li> <li>• Disseminating a campus-wide flyer requesting research-based articles pertaining to hazing and bullying to be used in the soon-to-be published "FAMU Journal on Anti-hazing &amp; Bullying" (five articles were received). This peer review journal, which will be web-based and in print form, will be used as a platform to provide research and data on the topics of hazing and bullying. FAMU students, FAMU faculty and researchers from around the country will be encouraged to contribute to this publication.</li> </ul> <p>Planned anti-hazing initiatives and activities include:</p> <ul style="list-style-type: none"> <li>• Facilitation of anti-hazing presentations for all new students attending Freshman</li> </ul>	<p style="text-align: center;">✓</p>

	<p>Orientations held during the summer months. Presentations will also be held during the fall semester for freshmen who did not attend summer orientation, as well as, for transfer students who are new to FAMU;</p> <ul style="list-style-type: none"> <li>• Facilitation of anti-hazing presentations to all Marching 100 members during the pre-season drills and practices;</li> <li>• Coordination with the university Pan-Hellenic council and the Greek life coordinator so that more robust training on anti-hazing strategies will be conducted with Greek letter organizations;</li> <li>• Participation in the Office of Student Activities' Clubs and Organizations' campus safety series;</li> <li>• The hosting of National Hazing Prevention Week September 22 - 26, 2014. FAMU will be hosting week-long activities during the National Hazing Prevention Week: <ul style="list-style-type: none"> <li>○ Monday: Pledge Day and Banner Hanging Competition;</li> <li>○ Tuesday: Service Day at local schools;</li> <li>○ Wednesday: Anti-Hazing Forum;</li> <li>○ Thursday: "Go Greek" Symposium; and</li> <li>○ Friday: Alcohol Awareness</li> </ul> </li> <li>• The hosting of an anti-hazing symposium on campus on October 2, 2014.</li> </ul> <p><b>December 2013:</b> Bryan Smith reported that an update was provided to the university's board of trustees, and the next update will be in April 2014. He will provide us with a copy of the minutes from the past meeting.</p> <p><b>May 2013:</b> Completed at FAMU board of trustees meeting April 10-11, 2013.</p>	
<b>Student Conduct Code</b>		
<p><b>(E4)</b> Revise the Student Conduct Code to allow for university disciplinary action concurrent with or subsequent to other criminal or civil proceedings.</p>	<p><b>August 2014: COMPLETED</b></p> <p>The Student Code of Conduct is included in the University's Student Handbook also known as "The Fang." Many sections of this document were revised in mid-2013 to, among other things, address the need to allow for university disciplinary action concurrent with or subsequent to other criminal or civil proceedings.</p> <p>In addition, revisions to FAMU Regulation 2.012 <i>Student Code of Conduct</i> were presented to the Board of Trustees for their consideration during the June 4, 2014, Board Meeting.</p> <p><b>December 2013:</b> Bryan Smith confirmed this item is complete. The new Student Conduct Code is available online, and he will provide us with a link.</p> <p><b>June 2013:</b> Revised Student Code of Conduct approved at June 6, 2013, board of trustees meeting.</p> <p><b>May 2013:</b> Student Code of Conduct will reflect this language - anticipated by June 2013.</p>	<p>✓</p>