

FLORIDA **A&M** UNIVERSITY
Board of Trustees

Audit and Compliance Committee Meeting
Wednesday, March 3, 2021
9:45 a.m.

Committee Members: Craig Reed, Chair
Ann Marie Cavazos, Michael Dubose, Dominique Xavier McClinton, and Belvin Perry

AGENDA

- | | | |
|-----|---------------|----------------------|
| I. | Call to Order | Trustee Craig Reed |
| II. | Roll Call | Ms. Debra Barrington |

ACTION ITEMS

- | | | |
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| III. | Minutes: Consideration of Approval – December 2, 2020, 9:15 a.m. | Trustee Reed |
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INFORMATIONAL ITEMS

- | | |
|---|-----------------|
| Office of Compliance and Ethics: | Rica Calhoun |
| IV. Office of Compliance and Ethics Update | |
| Division of Audit: | Joe Maleszewski |
| V. Audit and Investigative Follow-up | |
| VI. External Audits and Program Reviews | |
| VII. Internal Controls Training Update | |
| VIII. Internal Controls Assessment and BOT Assurance Statement Process/Timeline | |
| IX. Fraud Regulation and Policy Update | |
| X. Division of Audit Update | |
| XI. Adjournment | |

**Florida Agricultural and Mechanical University
Board of Trustees**



**Audit & Compliance Committee Meeting
Trustee Craig Reed, Chair
Wednesday, December 2, 2020
9:15 AM**

Committee Minutes (Zoom Meeting)

Members Present: Trustee Craig Reed, Chair, Trustee Ann Marie Cavazos
Trustee Dominique Xavier McClinton, Trustee Belvin Perry, Jr.
Trustee Robert Woody

Chair Craig Reed called the meeting to order. Ms. Debra Barrington called the roll. A quorum was established.

Chair Reed acknowledged three Action Items. The first action item was consideration for approval of the Wednesday, September 2, 2020, committee meeting minutes. Chair Reed requested a motion for approval. A motion was made by Trustee Robert Woody and seconded by Trustee Ann Marie Cavazos. The September 2, 2020, Audit and Compliance Committee meeting minutes were approved.

Chair Reed recognized Vice President Maleszewski to present the University Fraud Policy and Division of Audit's Audit Work Plan for consideration of approval. The Fraud Policy and Audit Work Plan were both presented. Both items received a motion and second. Both items were approved to be included on the full Board of Trustees consent agenda during the December 3, 2020, meeting.

Chair Reed recognized Chief Compliance and Ethics Officer Calhoun to present an Office of Compliance and Ethics (OCE) Update. Ms. Calhoun presented an update on office activities which included summary information on investigations and training activities. She also highlighted the activities from Compliance and Ethics week. Finally, she highlighted the roll out of the [Board of Trustees Governance Series: Compliance and Ethics](#). She indicated that the training module had been provided to all Board members but would be resent to help ensure all members complete the necessary training. Chair Reed complemented Ms. Calhoun and her staff on a job well done.

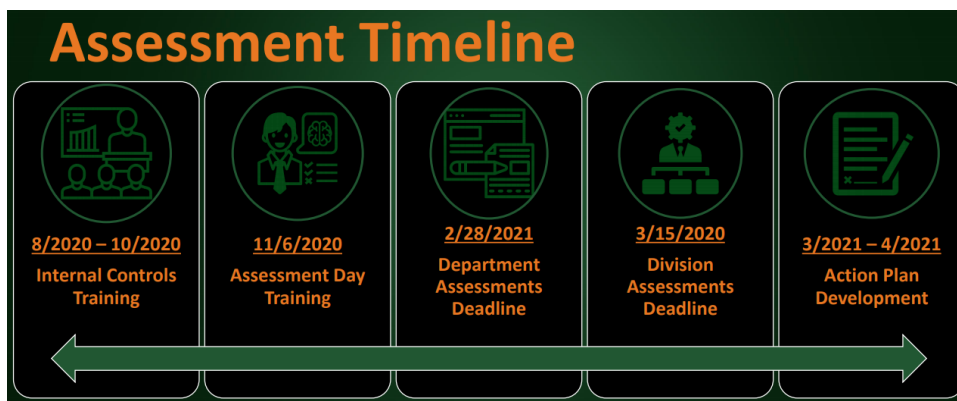
Chair Reed then asked VP Maleszewski to proceed with the Division of Audit informational items. VP Maleszewski shared information about the Division of Audit 2019-2020 Annual Report and highlighted key accomplishments from the prior fiscal year including the development of the Board of Trustees and University Policies on Internal Controls and Enterprise Risk Management. VP Maleszewski acknowledged the contributions of staff and noted key staff changes in the Division including the onboarding of two new auditors: Danielle Myrick, Auditor and Arriet Foster, Senior Auditor.

VP Maleszewski then asked Audit Director Melton to present the audit and investigative follow-up. Ms. Melton presented the follow-up items and responded to questions. Chair Reed complemented the presentation and noted great progress on corrective actions. He requested that the next report highlight those items which will require long-term efforts to finalize corrective actions.

Ms. Melton provided an update on the FAMU Direct Support Organization (DSO) financial audit reports which had been complete since the last Audit and Compliance Committee meeting in September 2020. Ms. Melton reviewed the audit of the FAMU Foundation, FAMU National Alumni Association, and FAMU Rattler Boosters' Inc.

Chair Reed then recognized VP Maleszewski to report on the status of mandatory internal controls training. VP Maleszewski indicated that over 1,800 faculty and staff have received the training to date. He highlighted divisions, colleges, and schools with high rates of compliance with the mandatory training requirement. He then indicated that on-demand training would be available through January 31, 2020, and another update would be provided at the March committee meeting.

VP Maleszewski then outlined the process and timeline that will be used to provide an annual internal controls assessment and related assurance statement to the FAMU Board of Trustees.



Director of Audit Melton then provided an update to the committee on the status and results of the following audit projects:

- CARES Act Audit:
 - Emergency Student Financial Aid Grants
 - Institutional Funds
 - HBCU Grants
- Federal Contracts and Disclosure Audit
- Knight Foundation Grant Audit (FY19-20)
- Transfer of Non-Athletic Auxiliary Funds Audit
- Performance Based Funding Date Integrity

Trustee Cavazos asked a question regarding purchasing card usage and Ms. Melton provided information about the process which requires mandatory training before an employee is authorized to have and use a FAMU purchasing card.

VP Maleszewski introduced the Division of Audit's newest Senior Auditor Arriet Foster and summarized her background for the committee.

Chair Reed and Trustee Cavazos both expressed their appreciation for the updates and commended staff for a job well done.

Before closing, Trustee Nicole Washington asked a question regarding the Athletic Budget and VP Maleszewski provided a response.

Chair Reed adjourned the meeting.

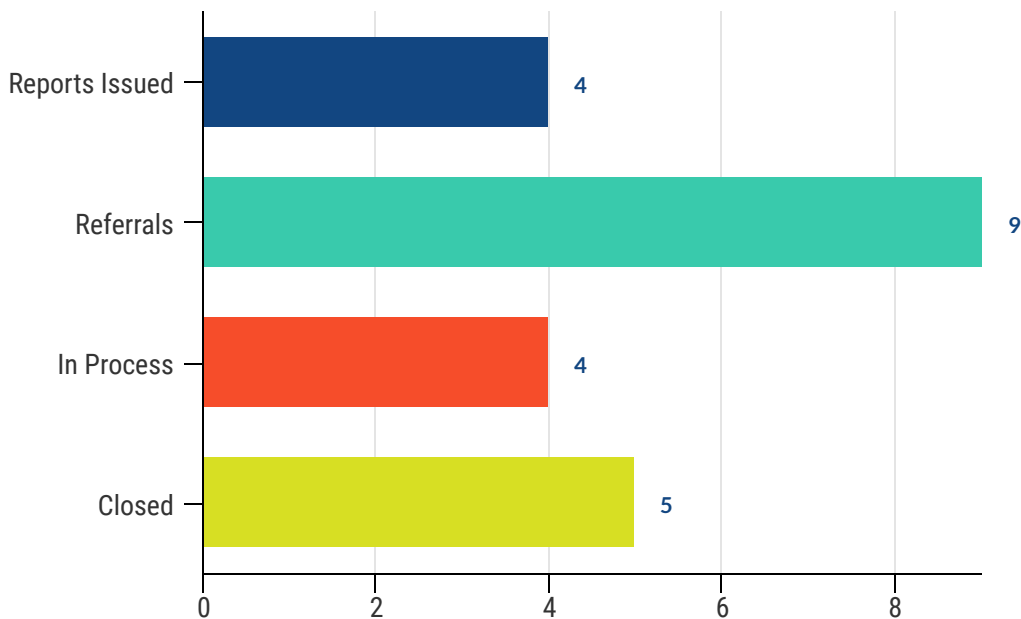
OFFICE OF COMPLIANCE AND ETHICS ACTIVITY REPORT

March 2021

THE BREAKDOWN

Conflict of Interest Mandatory Training Compliance Reviews and Follow Ups Spring Restart

Investigation Activities



Mandatory Training

- January 2021- Communication plan kickoff; integration onto online platform.
- February 2021- Troubleshoot active directory
- February 2021- Content completion
- March 2021- Rollout
- April 2021- Accountability and Outreach Phase

Snapshot

Compliance Reviews

- A. Admissions
- B. Retroactive Withdrawal
- C. Curriculum Review

Updates:

- A. Continue providing advisory services regarding the Spring Restart.
- B. The Board of Trustees Governance Series Training continues with Module 2.
- C. Communication to increase awareness of upcoming FAMU Fundamentals: Mandatory Training for employees.
- D. Secured Huron firm to provide an external review of the Compliance and Ethics Program.
- E. Continued work with the Research work group to amend policies and processes to comply with federal and state expectations surrounding foreign influence, including updating BOT 2005-14.
- F. OCE included in the Information Technology Steering Committee (ITSC) which provides oversight and recommendations for the strategic direction of Information Technology Services.



Memorandum

To: Craig Reed, Chair, Board of Trustees, Audit and Compliance Committee

From: Joseph K. Maleszewski, Vice President, Division of Audit
 Deidre Melton, Director for Audit

CC: Larry Robinson, Ph.D., University President
 Board of Trustees Members
 Senior Leadership Team Members

Date: February 16, 2021

Re: Status of Open Audit Findings

The Division of Audit worked with management to obtain an understanding of the actions taken by management since our November 18, 2020, report to the Audit and Compliance Committee. After validating each action taken by management, the Division of Audit prepared the following summary table followed by detailed information from management regarding the status of corrective actions and the level of residual risk for each audit finding.

	Finding	Status	Original Risk Level	Current Risk Level
1	2019 Crowe Report: Information Security – Policies and Procedures	OPEN	LOW	LOW
2	2018 Operational Audit Findings: Intercollegiate Athletics Programs – Deficit Cash Balances	OPEN	HIGH	HIGH
3	2018-19 Risk Assessment: Bragg Stadium Safety and Maintenance	OPEN	HIGH	MEDIUM
4	2018-19 Risk Assessment – Emergency Preparedness	OPEN	HIGH	HIGH
5	2018-19 Risk Assessment – Hazardous Lab Chemicals	CLOSED	HIGH	MEDIUM
6	FAMU DRS Florida Education Finance Program/Full-Time Equivalent Student Enrollment (8/2020): 0351-01 Complete and Accurate Student Attendance Records	CLOSED	MEDIUM	LOW
7	FAMU DRS Florida Education Finance Program/Full-Time Equivalent Student Enrollment (8/2020): 0351-02 Reported Student Course Schedules Not in Agreement with Bell Schedules	CLOSED	MEDIUM	LOW
8	FAMU DRS Florida Education Finance Program/Full-Time Equivalent Student Enrollment (8/2020): 0351-03 Retention of Attendance Records	CLOSED	LOW	LOW



	Finding	Status	Original Risk Level	Current Risk Level
9	FAMU DRS Florida Education Finance Program/Full-Time Equivalent Student Enrollment (8/2020): 0351-04 Incorrectly Reported ESE Student Course Schedule	CLOSED	MEDIUM	LOW
10	FAMU DRS Florida Education Finance Program/Full-Time Equivalent Student Enrollment (8/2020): 0351-05 Exceeding 6-Year Maximum Period Allowed for ESOL Funding	CLOSED	MEDIUM	LOW
11	FAMU DRS Florida Education Finance Program/Full-Time Equivalent Student Enrollment (8/2020): 035171/72 Teachers Not Certified or Approved to Teach Out-of-Field. No Parent Notification of Teacher Out-of-Field Teaching Status	CLOSED	HIGH	LOW
12	FAMU DRS Florida Education Finance Program/Full-Time Equivalent Student Enrollment (8/2020): 035173 Valid Florida Teaching Certificate	CLOSED	HIGH	LOW

Information Technology Services

1. 2019 Crowe Report: Information Security – Policies and Procedures

- a. **Status:** As part of the IT Centralization initiative, ITS completed an analysis of the findings included in the 2017-2018 Cloud Security Governance Audit, 2018-2019 Risk Assessment, and the 2019 Crowe Report. In addition to this analysis, ITS reviewed all existing information technology policy and procedures in order to determine a baseline for establishing best practices going forward. ITS has identified that over the past few years all of the audits and assessments have clearly established that the FAMU Information Technology security standards need to address National Institute of Standards and Technology (NIST) SP 800-53: *Security and Privacy Controls for Information Systems and Organizations* and NIST SP 800-171: *Protecting Controlled Unclassified Information in Nonfederal Systems and Organizations*. The comprehensive analysis and review process have led to the formulation of the **NIST Compliance Approach** in which ITS believes that every effort related to Information Technology Security controls should be made in accordance to overall compliance with NIST SP 800-53 and NIST SP 800-171.

The five polices that were identified within the Crowe report represent 5 of the 18 Security Control families identified within NIST SP 800-53 and NIST SP 800-171. In order to properly address the underlying intent of the Crowe Report, as well as previous audit findings, the University needs to revise the current BOT Enterprise Information Systems Security and Controls Policy 2008-01a. The revision of BOT Policy 2008-01a is necessary in order to fully comply with NIST SP 800-53 and NIST SP 800-171 and is the primary objective of the University Information Technology Security Policy. The draft policy is up for approval by FAMU Board of Trustees in its March 2021 meeting. Upon approval of the policy, the ITS will



develop the supporting standards to support the policy. ITS expects to complete the standards by July 2021. As a result, this item is considered **OPEN**.

- b. **Risk:** The original risk level of this item was assessed as **LOW**. The risk level continues to be **LOW** until the above policy revision is approved.

Athletics

1. 2018 Operational Audit Findings: Intercollegiate Athletics Programs – Deficit Cash Balances

- a. **Status:** Athletics took appropriate actions to balance their 2018-2019 and 2019-2020 budgets thereby avoiding deficit cash balances for those two fiscal years. They have taken steps to reduce expenses and increase fundraising in efforts to achieve a balanced budget for the 2020-2021 fiscal year. These efforts, if successful, will resolve the Board of Governors regulatory requirement that Athletics be a self-sustaining entity which was one issue related to this finding.

Another issue related to this finding was the University’s repayment of transfers of unallowable auxiliary funds to cover athletic expenditures. While the University has successfully met the terms of the original 2016 repayment plan, in August 2019 an independent audit firm, noted additional unallowable transfers of auxiliary funds were made to Athletics. The University has adjusted their receivables to account for the additional unallowable expenses. In January 2021 the University developed a revised payment plan, extending payments from 12 years to 29 years. The extension was to allow for the Athletics program to repay the debt owed to auxiliaries without significantly hampering the operational and strategic efforts of the athletic program. The revised repayment plan was communicated to the Florida Board of Governors during their Audit and Compliance Committee Meeting on January 27, 2021. This item is considered **OPEN** until the University has successfully been removed from oversight by the Florida Board of Governors and the Legislative Audit Committee.

- b. **Risk:** The original risk level of this item was assessed as **HIGH**. While Athletics has taken considerable actions to address the issues related to this finding, the risk remains **HIGH** for this finding to be repeated in the 2021 Operational Audit as a result of the additional unallowable transfers that were made by the University, the outstanding balance owed to auxiliaries, and uncertainties of the impacts a continued pandemic will have on athletic operations.

2. 2018-19 Risk Assessment: Bragg Stadium Safety and Maintenance

- a. **Status:** Athletics, working in conjunction with Finance and Administration, developed a schedule and timeline to address ADA, safety, and maintenance issues at Bragg Stadium. The plan is broken into the following two phases:
 - i. **Phase 1:** November 3, 2020 – September 30, 2021
 - 1. Metal pan and seat replacement, steel frame water blasting and repainting is essential to the safety of Bragg Stadium. This phase also includes replacing all steel pans and seats. The design will also include the water blasting and repainting of the steel frame seating replacement and we will entertain alternates pricing for



the Restrooms for Handicap/ ADA accessibility. Any steel repair details will be included.

2. **Actions Taken to Complete Phase I:** The University have entered into contract with Barkley Engineering for design services for Phase I of the Bragg Stadium Renovation Project. The University have also entered into contract with Southern Bleachers to expedite the design on the replacement bleacher system. Ram Construction has started obtaining pricing for phase I construction scope.

ii. **Phase 2:** January 11, 2021 – February 1, 2021

1. This phase includes the removal and replacement of the press box. The initial portion of phase would include an analysis of the needs of the University for the size and use of this facility. The Concession stands and restroom renovation would be to upgrade and modernize the existing concession stands and restrooms. In addition, this phase includes upgrading the stadium lighting and sound system.
2. **Actions Taken to Complete Phase II:** The Request for Design Services for Phase II has been issued.

FAMU has secured funding through the BluePrint Intergovernmental Agency Grant for Phase I and Phase II. Barkley Engineering has certified the use of the Bragg Stadium press box and seating for the 2021 season. This item remains **OPEN** until construction is completed to resolve the safety and ADA issues.

- b. **Risk:** The original risk level of this item was assessed as **HIGH**. While Athletics has taken the notable step of securing funds to address the issues outlined in the original finding, the risk remains **HIGH** until a fully actionable plan is developed and implemented by the University, that will allow for Bragg Stadium to be recertified for continued usage and reduce University liability associated with ADA compliance violations.

Finance and Administration

1. 2018-19 Risk Assessment – Emergency Preparedness

- a. **Status:** The original emergency preparedness findings centered around issues related to the University adequately preparing for hurricanes, or other weather-related events. This included identifying a dedicated funding source, establishing an evacuation plan, and hardening a building on FAMU campus that meet state requirements as a hurricane shelter. The University has taken several steps related to Emergency Preparedness to address these issues:
 - i. **Identifying a Dedicated Funding Source.** The University created a cross-functional team to develop a three-year financial plan to address emergency preparedness needs. FAMU Budgets across divisions (i.e., Police Department, Environmental Health and Safety, Health Services, Plant Operations and Maintenance, etc.) were evaluated to assess if some of the emergency preparedness needs can be addressed by existing budgets. In the interim, the University remains committed to using contingency funding to cover any gaps in funding should an emergency arise.
 - ii. **Establishing an Evacuation Plan.** General emergency evacuation plans are posted in multiple locations in each building. The Continuity of Operations Plan identifies a process for evacuation of students residing on campus prior to weather related



emergencies such as hurricanes (page 25-26). The plan includes closely monitoring the weather to determine the likely path of impact, contacting possible alternate facilities and coordinating with the Red Cross regarding shelter locations. Considering the uncertainty of hurricane impacts, the University has relied on relationships with a variety of other institutions within the SUS or throughout the southeast to provide aid as needed. It was determined by the Housing Director, that approximately 5-10% of the students in on campus housing may need assistance evacuating. The vast majority of students either return home or do not need assistance evacuating.

- iii. **Hardening a Building on FAMU Campus.** The University is in the process of researching grant funding opportunities that could be used to address the hardening of current infrastructure that would meet State guidelines for a hurricane shelter. FEMA has been identified as the agency that may assist the University with funding to enhance University building(s) for emergency readiness.
- iv. **Emergency Management Director.** The University is continuing with the hiring process for an Emergency Management Director. This director will be responsible for overseeing all emergency preparedness efforts. The position was posted in October 2020 and January 2021. While interviews have not been scheduled at this time, the Chair of the Search Committee anticipated having final candidate recommendations by March 5, 2021.

While the University has made progress on the issues related to identifying a dedicated funding source and establishing an evacuation plan, the Division of Audit will discuss these actions with the new Emergency Management Director, to ensure the actions fully meet industry standards and best practices. Additionally, the issues related to hardening a building on FAMU campus remains unresolved. Therefore, the finding remains **OPEN**, until these plans for building hardening have been finalized and/or implemented.

Risk: The original risk level of this item was assessed as **HIGH**. The risk remains **HIGH** for this finding while the University identifies new leadership to oversee the emergency management function, and works to develop comprehensive plans to address issues identified within the current budgetary constraints placed on the University.

Research

1. 2018-19 Risk Assessment – Hazardous Laboratory Chemicals

- a. **Status:** At the December 2020 Board of Trustees meeting, DoA reported that Division of Research had taken steps and made progress to address issues in the areas described below:
 - Chemical purchasing;
 - Chemical inventory tracking and monitoring;
 - Chemical disposal cost; and
 - Tracking and monitoring of lab personnel safety training attendance.

The finding was open at the December 2020 Board of Trustees meeting contingent upon the release of the 2020 campus wide lab safety inspection results. Lab safety inspections examine



areas include but are not limited to 1) fire inspection, 2) chemical inventory and storage, 3) tracking of chemical inventory, 4) lab personnel safety training, and 5) the presence of lab safety instructions. The inspection results are key performance indicators of the effectiveness of the mitigating controls implemented by management.

The 2020 campus wide lab safety inspection results indicated that 80 of the 113 labs passed the inspections (71%). The labs that did not pass the initial inspection subsequently went through reinspection and six passed the reinspection. As a result, the total passing rate increased to 76%. This is a significant improvement from the 2019 campus wide lab safety inspection, which revealed a passing rate of 39%.

Although the lab safety inspection passing rate has room for continuous improvement to achieve further compliance, the Division of Research has implemented control procedures to address issues related to hazardous lab chemicals and lab safety, that is expected to result in increased compliance. As a result, this item is **CLOSED**.

- b. **Risk:** The risk level of this item was assessed as **MEDIUM** at the December 2020 assessment. Despite the corrective measures put in place by Division of Research, the risk remains **MEDIUM**, due to the hazardous nature of chemicals in labs.

FAMU Developmental Research School

1. FAMU DRS Florida Education Finance Program/Full-Time Equivalent Student Enrollment (8/2020): 0351-01 Complete and Accurate Student Attendance Records

- a. FAMU DRS administrators have taken the following actions to address the issues and prevent reoccurring findings in the future:
 - i. On July 9, 2020, in conjunction with the Panhandle Area Educational Consortium (PAEC), FAMU DRS conducted an attendance workshop for DRS administration, school leaders and attendance staff to train individuals on the required Automated Student Attendance Record System standards and protocols (through the FOCUS Student Information System) and to ensure that all requirements are being met district-wide.
 - ii. On August 4, 2020, in conjunction with the Panhandle Area Educational Consortium (PAEC), FAMU DRS conducted an attendance and grades workshop for DRS faculty and staff members to train individuals on the required Automated Student Attendance Record System standards (through the FOCUS Student Information System) and protocols and ensure that all requirements are being met district-wide.
 - iii. FAMU DRS established the 2020-21 DRS K-12 Attendance Committee. One objective of the DRS Attendance Committee is to ensure that the district is meeting comprehensive attendance requirements as set forth by the Florida Department of Education and the state of Florida. To date, the committee has revised the DRS attendance policy to improve enforcement practices and school administrators have implemented faculty trainings and flowcharts within each school to train and inform teachers on the attendance policy and



requirements, including daily enforcement. The FAMU DRS Leadership Team also meet on a weekly basis to review attendance data and implement best practices district-wide to improve student attendance and attendance patterns including teacher input of attendance and school leader and district monitoring.

The actions taken by FAMU DRS Administration is appropriate to address the issues identified in the original report and reduce the risk of the finding reoccurring. The Division of Audit received information to validate that all necessary personnel attended the appropriate training on attendance, we also reviewed the revised attendance policy. As a result, this item is **CLOSED**.

- c. **Risk:** The original risk level of this item was assessed as **MEDIUM**. After taking into consideration the actions by FAMU DRS to establish the appropriate policies and training, the risk level has been lowered to **LOW**.

2. FAMU DRS Florida Education Finance Program/Full-Time Equivalent Student Enrollment (8/2020): 0351-02 Reported Student Course Schedules Not in Agreement with Bell Schedules

- a. FAMU DRS administrators have taken the following actions to address the issues and prevent reoccurring findings in the future:
 - i. On July 9, 2020, in conjunction with the Panhandle Area Educational Consortium (PAEC), FAMU DRS conducted an attendance workshop for DRS administration, school leaders and attendance staff to train individuals on the required Automated Student Attendance Record System standards and protocols (through the FOCUS Student Information System) and to ensure that all requirements are being met district-wide. The workshop included proper coding of student schedules for reporting student enrollment and attendance.
 - ii. FAMU DRS will continue to work with PAEC and its MIS and Guidance Departments to monitor and ensure that student course schedules are correctly reported in the district’s Student Information System (SIS) for FTE purposes district-wide. Mid-year monitoring took place January 2021.

The actions taken by FAMU DRS Administration is appropriate to address the issues identified in the original report and reduce the risk of the finding reoccurring. The Division of Audit received information to validate that all necessary personnel attended the appropriate training on attendance, we also reviewed the monitoring report for January 2021. As a result, this item is **CLOSED**.

- d. **Risk:** The original risk level of this item was assessed as **MEDIUM**. After taking into consideration the actions by FAMU DRS to establish the appropriate policies and training, the risk level has been lowered to **LOW**.

3. FAMU DRS Florida Education Finance Program/Full-Time Equivalent Student Enrollment (8/2020): 0351-03 Retention of Attendance Records

- a. FAMU DRS administrators have taken the following actions to address the issues and prevent reoccurring findings in the future:



- i. FAMU DRS plans to increase its share file capacity to include attendance records and related documents to be placed in a central location district and school-wide.

The actions taken by FAMU DRS Administration is appropriate to address the issues identified in the original report and reduce the risk of the finding reoccurring. The Division of Audit reviewed and validated attendance records in the SharePoint file. As a result, this item is **CLOSED**.

Risk: The original risk level of this item was assessed as **LOW**. After taking into consideration the actions by FAMU DRS to establish the appropriate Sharefile capacity, the risk level continues to be **LOW**.

4. FAMU DRS Florida Education Finance Program/Full-Time Equivalent Student Enrollment (8/2020): 0351-04 Incorrectly Reported ESE Student Course Schedule

- a. FAMU DRS administrations have taken the following actions to address the issues and prevent reoccurring findings in the future:
 - i. On July 9, 2020, in conjunction with the Panhandle Area Educational Consortium (PAEC), FAMU DRS conducted an attendance workshop for DRS administration, school leaders and attendance staff to train individuals on the required Automated Student Attendance Record System standards and protocols (through the FOCUS Student Information System) and to ensure that all requirements are being met district-wide. The workshop included proper coding of student schedules for reporting student enrollment and attendance.
 - ii. FAMU DRS will continue to work with PAEC and its MIS and Guidance Departments to monitor and ensure that student course schedules are correctly reported in the district’s Student Information System (SIS) for FTE purposes district-wide. Mid-year monitoring took place January 2021.

The actions taken by FAMU DRS Administration is appropriate to address the issues identified in the original report and reduce the risk of the finding reoccurring. The Division of Audit received information to validate all necessary personnel were appropriately trained on the required Automated Student Attendance Record System standards and protocols, and reviewed the mid-year monitoring report for effectiveness. As a result, this item is **CLOSED**.

- e. **Risk:** The original risk level of this item was assessed as **MEDIUM**. After taking into consideration the actions by FAMU DRS to establish the appropriate training, the risk level has been lowered to **LOW**.

5. FAMU DRS Florida Education Finance Program/Full-Time Equivalent Student Enrollment (8/2020): 0351-05 Exceeding 6-Year Maximum Period Allowed for ESOL Funding

- a. FAMU DRS administrations have taken the following actions to address the issues and prevent reoccurring findings in the future:



- i. FAMU DRS district administrators met with the ESOL/ELL Department to implement best practices to ensure that identified student are correctly reported in the district’s Student Information System (SIS) for FTE purposes and are reported within the allowable period for state funding for ESOL. Mid- year monitoring will take place January 2021.

The actions taken by FAMU DRS Administration is appropriate to address the issues identified in the original report and reduce the risk of the finding reoccurring. The Division of Audit received information to validate all necessary personnel were appropriately trained on the required English for Speakers of Other Languages (ESOL) standards, and reviewed the mid-year monitoring report for effectiveness. As a result, this item is **CLOSED**.

- f. **Risk:** The original risk level of this item was assessed as **MEDIUM**. After taking into consideration the actions by FAMU DRS to establish the appropriate policies, the risk level has been lowered to **LOW**.

6. FAMU DRS Florida Education Finance Program/Full-Time Equivalent Student Enrollment (8/2020): 035171/72 Teachers Not Certified or Approved to Teach Out-of-Field. No Parent Notification of Teacher Out-of-Field Teaching Status

- a. FAMU DRS administrations have taken the following actions to address the issues and prevent reoccurring findings in the future:
 - i. FAMU DRS identified all teachers who have not met the required 60 in-service training points (or more) in ESOL strategies required by SBE Rule 6A-1.0503 FAC and listed such teachers on the district’s website as required. The parents of the students being taught were notified immediately of the teachers’ out-of-field status via letter. Each teacher was also required to acknowledge and sign an “agreement to earn” letter stipulating that all requirements will be met before the state mandated deadline.

The actions taken by FAMU DRS Administration is appropriate to address the issues identified in the original report and reduce the risk of the finding reoccurring. The Division of Audit received information to validate all necessary personnel were appropriately trained on the required English for Speakers of Other Languages (ESOL) standards, and reviewed the mid-year monitoring report for effectiveness. As a result, this item is **CLOSED**.

Risk: The original risk level of this item was assessed as **HIGH**. After taking into consideration the actions by FAMU DRS to establish the appropriate policies, the risk level has been lowered to **LOW**.

7. FAMU DRS Florida Education Finance Program/Full-Time Equivalent Student Enrollment (8/2020): 035173 Valid Florida Teaching Certificate

- a. FAMU DRS administrations have taken the following actions to address the issues and prevent reoccurring findings in the future:



- i. FAMU DRS has identified all teachers that are deemed adjunct instructors and proper documentation is on file with Human Resources for each teacher. The FAMU DRS Professional Development and Human Resource Department is working with each teacher to ensure proper certification.

The actions taken by FAMU DRS Administration is appropriate to address the issues identified in the original report and reduce the risk of the finding reoccurring. The Division of Audit received documentation of valid teaching certificates for two teachers that previously did not have one. As a result, this item is **CLOSED**.

Risk: The original risk level of this item was assessed as **HIGH**. After taking into consideration the actions by FAMU DRS to establish the appropriate policies, the risk level has been lowered to **LOW**.

External Audit and Review Calendar

February 16, 2021

Name of Audit or Entity	Frequency	Type (Financial, Operational, or Compliance)	Date of Last or Upcoming Audit or Review	Conducted By	Report Issued to (Legislature, Governor, Board, President, Vice President, Executive Director)
Comprehensive Annual Financial Report	Annual ¹	Combination	February 2020 ²	Department of Financial Services	Legislature and Governor
FAMU Financial Statement Audit	Annual	Financial	March 2021 ³	Auditor General	Legislature
FAMU Operational Audit	Periodic ⁴	Operational	April 2021 ⁵	Auditor General	Legislature
Compliance and Internal Control Over Financial Reporting and Federal Awards	Annual ⁶	Combination	March 2020 ⁷	Auditor General	Legislature
FAMU Developmental Research School	Periodic	Operational	August 2020 ⁸	Auditor General	Legislature
Florida Bright Futures Scholarship Program	Periodic	Operational	October 2020 ⁹	Auditor General	Legislature
FAMU Foundation, Inc Operational Audit (DSO)	Every 3 years	Operational	April 2019	Clifton Larson Allen, LLP	Foundation Board of Directors
FAMU Foundation, Inc Financial Audit (DSO)	Annual	Financial	October 19, 2020	Watson Rice Accountants and Advisors	Foundation Board of Directors
FAMU National Alumni Association Audit (DSO)	Annual	Financial	October 23, 2020	Grayson Accounting and Consulting	National Alumni Association Board of Directors
FAMU Rattler Boosters, Inc. Audit (DSO)	Annual	Financial	October 16, 2020	Grayson Accounting and Consulting	Rattler Boosters, Inc Board of Directors
FAMU Intercollegiate Athletics Audit (FY 2019) ¹⁰	Annual	Financial	October 15, 2020	James Moore Certified Public Accountants and Consultants	FAMU Board of Trustees ¹¹

¹ [216.102\(3\), Florida Statutes – Filing of financial information; handling by Chief Financial Officer; penalty for noncompliance](#)

² [Comprehensive Annual Financial Report for FY 19 was issued on February 21, 2020](#)

³ [2020-150 FAMU Financial Statement Audit was last issued on March 12, 2020](#)

⁴ [11.45, Florida Statutes – Definitions; duties; authorities; reports; rules](#)

⁵ [2019-063 – FAMU Operational Audit was last issued on December 3, 2018](#)

⁶ [Title 2 U.S. Code of Federal Regulations Part 200, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards \(Uniform Guidance\)](#)

⁷ [2020-170 – State of Florida – Compliance and Internal Control Over Financial Reporting and Federal Awards was issued on March 25, 2020](#)

⁸ [2021-011 – FAMU Developmental Research School-Florida Education Finance Program–Full-Time Equivalent Student Enrollment issued on August 20, 2020](#)

⁹ [2021-044 – Florida Bright Futures Scholarship Program by Florida’s Public Universities and Colleges was issued during October 2020](#)

¹⁰ FAMU Intercollegiate Athletics Audit for FY 2020 engagement letter was signed on December 15, 2020

¹¹ [FAMU Board of Trustees Policy 2005-16- Audit of University Athletics Finances](#)

External Audit and Review Calendar

February 16, 2021

Name of Audit or Entity	Frequency	Type (Financial, Operational, or Compliance)	Date of Last or Upcoming Audit or Review	Conducted By	Report Issued to (Legislature, Governor, Board, President, Vice President, Executive Director)
FAMU Intercollegiate Athletics Agreed Upon Procedures (AUP) for FY 2016 ¹²	Annual ¹³	Financial	August 16, 2017	James Moore Certified Public Accountants and Consultants	President
FAMU Sponsored Programs	Variable	Combination	Variable	Variable Agencies	Vice President, Research and President
Biological Systems Engineering	Every six (6) years	Compliance	2021-22	Engineering Accreditation Commission (EAC) of ABET	President
Chemical Engineering	Every six (6) years	Compliance	2021-22	Accreditation Board for Engineering and Technology (ABET)	President
Civil Engineering	Every six (6) years	Compliance	2021-22	Accreditation Board for Engineering and Technology (ABET)	President
Electrical Engineering	Every six (6) years	Compliance	2021-22	Accreditation Board for Engineering and Technology (ABET)	President
Computer Engineering	Every six (6) years	Compliance	2021-22	Accreditation Board for Engineering and Technology (ABET)	President
Industrial Engineering	Every six (6) years	Compliance	2021-22	Accreditation Board for Engineering and Technology (ABET)	President
Mechanical Engineering	Every six (6) years	Compliance	2021-22	Accreditation Board for Engineering and Technology (ABET)	President
College of Education	Every seven (7) years	Compliance	2019-20	Council for the Accreditation of Educator Preparation (CAEP)	President
Computer Science (Bachelors)	Every six (6) years	Compliance	2019-20	Computing Accreditation Commission (CAC) of ABET	President
Construction Engineering Technology	Every six (6) years	Compliance	2021-22	Accreditation Board for Engineering and Technology (ABET)	President

¹² FAMU Intercollegiate Athletics Agreed Upon Procedures for FY 2017 – FY 2020 are past due. Due date is January 15 following a fiscal year end.

¹³ [NCAA Bylaw 3.2.4.15.1 – NCAA requires institutions to have an independent public accountant review revenues and expenses according to AUP guidelines.](#)

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Electronic Engineering Technology	Every six (6) years	Compliance	2021-22	Accreditation Board for Engineering and Technology (ABET)	President
Health Administration	Every seven (7) years	Compliance	2020-21	Commission on Accreditation of Healthcare Management Education (CAHME)	Division Director
Health Care Management (B)	Every six (6) years	Compliance	2021-22	Association of University Programs in Health Administration (AUPHA)	Division Director
Journalism (B)	Every six (6) years	Compliance	2019-20	Accrediting Council on Education in Journalism and Mass Communications (ACEJMC)	Division Director
Health Informatics and Information Management (B)	Every seven (7) years	Compliance	2020-21	Commission on Accreditation for Health Informatics and Information Management Education (CAHIIM)	Division Director
Nursing (BSN)	Every eight (8) years	Compliance	2021-22	Accreditation Commission for Education in Nursing	Dean
Nursing (MSN)	Every eight (8) years	Compliance	2022-23	Accreditation Commission for Education in Nursing	Dean
Occupational Therapy (M)	Every ten (10) years	Compliance	2022-23	Accreditation Council for Occupational Therapy Education (ACOTE)	Division Director
PharmD	Every eight (8) years	Compliance	2021-22	American Council for Pharmacy Education (ACPE)	President
Public Relations (B)	Every six (6) years	Compliance	2019-20	Accrediting Council on Education in Journalism and Mass Communications (ACEJMC)	Division Director
Public Health (M, D)	Every seven (7) years	Compliance	2020-21	Council on Education for Public Health	President
Social Work (B, M)	Every seven (7) years	Compliance	2021-22	Council on Social Work Education (CSWE)	President