Overview

- Florida A&M University Investigation Review
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  - Internal Controls Defined
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  - Institutional Controls
  - Director of Bands
  - Office of Judicial Affairs
  - University Police Department (UPD)
  - Proposed Anti-Hazing Committee
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  - Summary
Florida A&M University Investigation Review

- Investigation Focus:
  - Did FAMU implement a rigorous program to **prevent**, **detect**, **deter** and effectively sanction students engaged in hazing activities?
    - The establishment of such a program demonstrates sound institutional and internal controls.
Florida A&M University Investigation Review

• Internal Controls Defined:
  ▪ **Policies, procedures, and processes** that comply with governing authorities and are effective in achieving the integrity of the University.

  • The establishment of such policies, procedures, and processes demonstrates sound institutional controls.
Florida A&M University Investigation Review

A&M-Commerce Review

- The following slides contain questions that were identified in the Florida A&M University Investigation.

- How would A&M-Commerce fair if asked the same questions during an investigation and/or audit?

- Candid responses are needed in order to prevent, detect, and deter hazing activities.

The picture above is included as part of the A&M-Commerce scenario and does not imply or infer misconduct by the A&M-Commerce Marching Band.
Florida A&M University Investigation Review

- Institutional Controls:
  - What communication protocol is used between senior staff and direct reports?
    - Does it vary amongst divisions and departments?
  - What type of interaction take place between Student Organization & Activities, Judicial Affairs, and UPD in regards to internal and/or program reviews?
  - Does the campus have the adequate funding and staff to carry out assigned duties?
Florida A&M University Investigation Review

- **Director of Bands:**
  - How often are Band Directives updated to enhance or improve band operations?
  - Does this Directive include written policies and procedures for verifying student enrollment and eligibility with the Registrar’s Office?
  - Does this Directive cover procedures for reviewing eligibility requirements of those individuals identified in hazing activities by Judicial Affairs?
  - Does this Directive list consequences for hazing violations?
Florida A&M University Investigation Review

- **Office of Judicial Affairs:**
  - Does Judicial Affairs have written policies and procedures in place for potential Student Code of Conduct violations referred from the UPD?
  - Does Judicial Affairs have a file index system designed to maintain and track records of student disciplinary actions?
  - How often is the Student Code of Conduct reviewed?
  - Does the Judicial Affairs Officer have a secondary point of contact identified and trained on handing these responsibilities?
University Police Department (UPD):

- Does UPD have written policies and procedures in place for referring cases of potential Student Code of Conduct violations to Judicial Affairs?

- Does UPD refer cases of potential Student Code of Conduct violations to Judicial Affairs in a timely manner?
  - If so, what is the timeframe identified for referral to Judicial Affairs?
Sample Anti-Hazing Committee

Organizational Reporting Structure

Vices President for Student Access and Success

Director of Bands

- Office of Judicial Affairs
- University Police Department
- Compliance Office
- Director of Safety & Risk Management
- Student Activities & Leadership
Florida A&M University Investigation Review

Investigation Conclusion:

- FAMU’s anti-hazing program failed to comply with applicable regulations and state law due to inadequate internal controls.

- The University was unable to demonstrate the existence of adequate institutional controls to ensure the effective implementation of the hazing and Student Code of Conduct regulations, and Band Directive, which formed the basis of the anti-hazing program.
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