



FLORIDA
AGRICULTURAL AND
MECHANICAL
UNIVERSITY

Internal Controls Assurance Statement

May 2024

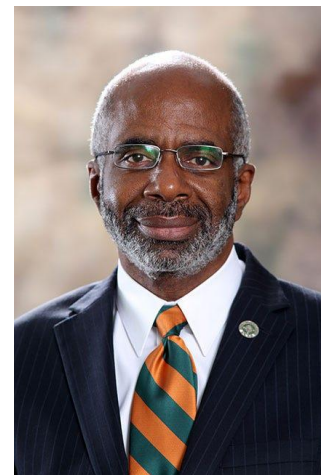


Statement from the President – Larry Robinson, Ph.D.

Florida Agricultural and Mechanical University has been named the No.1 Public Historically Black College & University in the U.S. News & World Report Rankings for the past five years. In part, this honor was made possible by the strong system of internal controls that supports our business, financial, and academic operations and the hard work of everyone on our team to ensure controls are in place and functioning optimally.

As we strive for excellence in all our endeavors, it is imperative that we maintain a strong focus on internal controls to ensure the integrity, efficiency, and effectiveness of our operations. Our university has made significant strides in establishing a robust internal control framework that has served us well. However, we recognize that the landscape of higher education is constantly evolving, and with it, the challenges and risks we face. Therefore, continuous improvement of our internal controls is not just a necessity but a strategic imperative.

Strong internal controls are the bedrock upon which we can advance our institution among the leading universities globally. By enhancing our internal control systems, we can better manage risks, safeguard our assets, and ensure compliance with laws and regulations. More importantly, effective internal controls foster a culture of accountability and transparency, which is essential for maintaining the trust and confidence of our stakeholders. The following highlights a few of the initiatives we have undertaken to improve our overall internal control infrastructure.



SERVICE EXCELLENCE

The university has established a comprehensive Service Excellence Initiative aimed at enhancing overall customer satisfaction by systematically improving processes and infrastructure. This initiative underscores our commitment to providing exceptional service to all stakeholders, including students, faculty, staff, and visitors. Key components of the initiative involve streamlining administrative procedures, upgrading technological resources, and fostering a culture of continuous improvement and responsiveness. By focusing on these areas, we aim to create a more efficient, effective, and customer-centric environment, thereby strengthening the university's reputation for excellence and fostering long-term success.

STUDENT SUCCESS INITIATIVE

The Chief Operating Officer is spearheading a Student Success Initiative designed to enhance the university's internal control structure, specifically targeting student service functions such as Financial Aid, Admissions, Registrar, Student Accounts, Advisement, and Housing. This initiative aims to implement robust control measures that ensure accuracy, efficiency, and compliance in these critical areas. By streamlining processes, reducing redundancies, and leveraging technology, the initiative will enhance transparency and accountability, ultimately leading to more reliable and efficient student services. Improved controls will mitigate risks related to errors, fraud, and non-compliance, thereby fostering a secure and trustworthy environment for both students and staff.

The impact of the Student Success Initiative on student outcomes is expected to be profound. Enhanced controls in Financial Aid will ensure timely and accurate disbursement of funds, reducing financial stress for students. Streamlined Admissions processes will provide a smoother and more responsive experience for prospective students, while improvements in the Registrar and Student Accounts functions will ensure accurate record-keeping and prompt resolution of financial issues. Effective Advisement and Housing services will contribute to a supportive and well-organized campus environment, facilitating students' academic and personal development. Overall, these enhancements will create a more supportive, efficient, and responsive service

environment, significantly improving the student experience and contributing to higher retention and graduation rates.

POLICY

The establishment of the University Policy Office, the appointment of a Chief Policy Officer, and the mandatory training of all staff on policies over the past year mark significant strides in strengthening our internal controls and compliance framework. By centralizing policy management and oversight, the University Policy Office ensures consistency, clarity, and adherence to best practices across all departments. The Chief Policy Officer plays a pivotal role in guiding policy development and implementation, ensuring alignment with regulatory requirements and institutional goals. Mandatory training for all staff enhances awareness and understanding of key policies, fostering a culture of compliance and accountability. These measures collectively enhance our ability to prevent, detect, and respond to compliance issues, thereby safeguarding the university's integrity and reputation.

PRIVACY

The appointment of a Chief Privacy Officer, coupled with mandatory privacy training for all staff and the celebration of Privacy Awareness Week, underscores our commitment to strengthening internal controls related to data protection and privacy. The Chief Privacy Officer leads efforts to safeguard personal information, ensuring that our policies and practices comply with relevant laws and regulations. Comprehensive training has elevated staff awareness and proficiency in handling sensitive data, reducing risks associated with data breaches and privacy violations. Privacy Awareness Week has further reinforced the importance of privacy, fostering a culture of vigilance and responsibility. These initiatives collectively enhance our internal controls, bolstering the University's reputation for protecting the privacy and security of its stakeholders.

NEW EMPLOYEE ORIENTATION

The University has introduced an in-person Employee Orientation program to effectively inform all new hires about essential policies and processes. This comprehensive orientation ensures that new employees gain a clear understanding of the university's operational framework, compliance requirements, and best practices from the outset. Additionally, the program provides a valuable platform for new staff to engage directly with key governance leaders, fostering open communication and a deeper appreciation for the university's commitment to excellence and accountability. By integrating this interactive orientation into our onboarding process, we enhance internal controls, promote a culture of transparency, and ensure that all employees are well-equipped to contribute to the university's mission and uphold its standards.

CONTROL SELF-ASSESSMENTS

The Division of Audit has implemented a new service that collaborates with departments to perform Control Self-Assessments (CSAs), a significant step toward enhancing internal controls across the university. These CSAs enable departments to flowchart their processes, identify pain points, and pinpoint both risks and existing controls. By benchmarking best practices and developing actionable plans, departments can systematically strengthen their internal controls. This initiative has already made a positive impact, as demonstrated by the recent collaboration with the Procurement Office and Controllers Office, resulting in a roadmap for developing more efficient and transparent procurement and financial processes. In the upcoming year, the Division of Audit will extend this service to the Department of Campus Safety and Security, anticipating similar improvements in risk management and operational effectiveness. By empowering departments to take ownership of their controls, this program not only fortifies individual units but also enhances the overall resilience and integrity of the university.

At my direction, the Division of Audit and the Office of the Chief Operating Officer collaborated to facilitate an assessment of our internal controls based on the Framework to determine whether all components and principles

of controls were present and functioning. This assessment applied a maturity model and identified both internal control strengths and opportunities for improvement. The maturity model employed a scale from 1-Adhoc (controls were non-existent with no formal procedures or metrics for performance measures) to 5- Optimized (controls were continuously reviewed and improved, highly automated, with comprehensive and defined performance metrics).

I am pleased to report that on this five-point maturity scale the University averaged 3.67 or higher on each of the five components of control as summarized in the table below.

COSO Internal Control Component	Average Maturity Level
1. Control Environment	4.2
2. Risk Assessment	4
3. Control Activities	3.67
4. Information and Communication	4.33
5. Monitoring Activities	4.5

In this document, I present some of the details of our internal control assessment. It is organized by the Framework's five components of controls and 17 principles. I highlight some notable internal control strengths as well as opportunities for improvement which require our collective attention and resources. I look forward to working with our Board of Trustees, members of my senior leadership team, faculty and staff to enhance our internal controls as a strategy to improving efficiency and effectiveness in achieving our shared priorities and goals.

Thank you,



Larry Robinson, Ph.D.
President

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Internal Controls Framework Overview

In December 2019, the Florida Agricultural and Mechanical University (University) Board of Trustees (BOT) adopted Policy 2019-01 *Internal Controls and Enterprise Risk Management*. The policy mandated that the University adopt the Committee of Sponsoring Organizations of the Treadway Commission (COSO) Internal Controls – Integrated Framework (Framework). The Framework stipulates that a system of internal controls must be designed and implemented to support the following components.

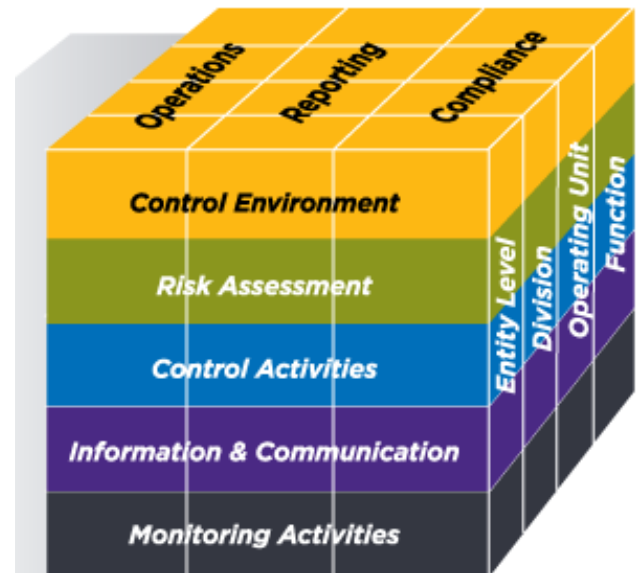
Control Environment – the set of standards, processes, and structures that provide the basis for carrying out internal controls across the University. The control environment comprises the commitment to integrity and ethical values that establish oversight responsibility and enforce accountability.

Risk Assessment – the process to identify, analyze, and assess risks to the achievement of objectives.

Control Activities – the actions established through policies and procedures to mitigate risks to the achievement of institutional objectives.

Information and Communication – the use of relevant information to disseminate clear messages. Sound internal controls establish expectations and procedures to support the reliability and integrity of financial information and reporting.

Monitoring Activities – the use of evaluations to ascertain whether internal controls are present and functioning.



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The following seventeen principles support the five components of control.

Control Environment

1. Demonstrates commitment to integrity and ethical values
2. Exercises oversight responsibility
3. Establishes structure, authority and responsibility
4. Demonstrates commitment to competence
5. Enforces accountability

Risk Assessment

6. Specifies relevant objectives
7. Identifies and analyzes risk
8. Assesses fraud risk
9. Identifies and analyzes significant change

Control Activities

10. Selects and develops control activities
11. Selects and develops general controls over technology
12. Deploys through policies and procedures

Information & Communication

13. Uses relevant information
14. Communicates internally
15. Communicates externally

Monitoring Activities

16. Conducts ongoing and/or separate evaluations
17. Evaluates and communicates deficiencies

In accordance with BOT Policy 2019-01, the President and the President’s administration are responsible for establishing, maintaining, and consistently applying internal controls designed to do the following.



Prevent and detect fraud, waste, and abuse as defined in Section 11.45(1), Florida Statutes



Promote and encourage compliance with applicable laws, rules, regulations, contracts, grant agreements, and best practices



Support economical and efficient operations



Ensure reliability of financial records and reports



Safeguard University assets

Additionally, the BOT charged the President with the responsibility for assessing the effectiveness of the University’s system of internal controls and reporting annually to the Board of Trustees regarding the University’s internal controls, any identified weaknesses, and associated corrective actions.

In response to the BOT’s charge, President Larry Robinson, Ph.D., instructed management, faculty, and staff to implement internal controls that were appropriate, reliable, cost-effective, comprehensive, and reasonable in supporting the mission as well as the strategic, business, and performance objectives of the University. To facilitate these efforts, he worked with the Division of Audit to:

- Provide internal controls training to all management, faculty, and staff;
- Develop an internal control self-assessment tool for use by divisions, colleges, and schools; and
- Evaluate the University’s overall internal control system utilizing information gathered through the internal control self-assessment tool and interviews conducted with internal and external parties, audits, investigations, and observations made over the past year.

During the current fiscal year, the Division of Audit, developed risk and control self-assessment surveys for all departments to determine whether appropriate controls were in place to address various types of risks and how effective the controls were at mitigating the identified risk.

The University’s system of internal controls is dynamic, and controls change to meet the needs of the organization over time. As a result, the University chose to implement a maturity model to guide the implementation and continuous improvement of the University’s overall internal controls framework. The maturity model uses a five-point scale and is outlined below.

Maturity Stage	Observable Process Characteristics			
	Procedures	Controls	Metrics	Improvement Mechanisms
1. Ad Hoc	No formal procedures exist.	Controls are non-existent or primarily in reaction to a “surprise.”	There are not metrics or performance monitoring.	None
2. Repeatable	Some standard procedures exist,	Mostly detective controls are in place, minimal preventive controls, and highly manual.	Few performance metrics exist; thus, performance monitoring is	Most likely in reaction to audits or service disruptions.

Maturity Stage	Observable Process Characteristics			
	Procedures	Controls	Metrics	Improvement Mechanisms
	relies on “tribal knowledge ¹ .”		inconsistent or informal.	
3. Defined	Procedures are well documented, but not kept current to reflect changing business needs.	Preventive and detective controls are employed, still reliant on manual activities.	Some metrics are used, but performance monitoring is still manual and/or infrequent.	Generally, occurs during periodic (e.g. annual) policy and procedures review.
4. Managed	Procedures and controls are well documented and kept current.	Preventive and detective controls are employed, with greater use of automation to reduce human error.	Many metrics are used with a blend of automated and manual performance monitoring.	Best practices and/or benchmarking are used to improve processes.
5. Optimized	Process and controls are continuously reviewed and improved.	Preventive and detective controls are highly automated to reduce human error and cost of operations.	Comprehensive, defined performance metrics exist, with extensive automated performance monitoring.	Extensive use of best practices, benchmarking, and/or self-assessment to continuously improve processes.

The following pages detail the results of the University’s assessment of internal controls based on the above maturity model, and identify both strengths and opportunities found within each of the Framework’s components and principles of control.

¹ Tribal knowledge is any unwritten information that is not commonly known by others within an organization. This term is used most when referencing information that may need to be known by others in order to produce quality products or services. The information may be key to quality performance, but it may also be totally incorrect.

Internal Controls Framework Assessment



CONTROL ENVIRONMENT

The control environment is the set of standards, processes, and structures that provide the basis for carrying out internal control across the organization. The control environment is comprised of the following five principles of control, which were all found to be present and functioning.

	PRINCIPLES OF CONTROL	MATURITY LEVEL
P.1	The organization demonstrates a commitment to integrity and ethical values.	5
P.2	The board of directors demonstrates independence from management and exercises oversight of the development and performance of internal control.	4
P.3	Management establishes, with board oversight, structures, reporting lines, and appropriate authorities and responsibilities in the pursuit of objectives.	5
P.4	The organization demonstrates a commitment to attract, develop, and retain competent individuals in alignment with objectives.	4
P.5	The organization holds individuals accountable for their internal control responsibilities in the pursuit of objectives.	3

The University’s control environment is shaped by its’ history, mission, core values, and regulatory oversight, and the higher education industry in which we compete and allowed the University to be resilient throughout the COVID-19 pandemic and continue to meet its business objectives. Key strengths of the control environment at the University are detailed below.

STRENGTHS



FAMU’s Boldly Striking, Strategic Plan Priority 5, Goal 5.3.1 Promote a clear organizational commitment for a stronger ethical culture through consistent messaging and tone throughout the University.



In June 2022, the Board of Trustees (BOT) voted to revise the Policy 2019-01 [Internal Controls and Enterprise Risk Management](#) to strengthen the language related to internal controls, define risk, and further the define the roles and responsibilities for FAMU management and staff related to internal controls and enterprise risk management practices.



Strong focus on training to communicate requirements and expectations:

- Compliance Week (November 2023): Awareness campaign with a focus on building a culture of compliance.
- Fraud Week (November 2023): Awareness campaign with a focus on anti-fraud policies, procedures, best practices, and red flag identifiers.
- FAMU Fundamentals (March 2024): A mandatory training program for all management, faculty, and staff that covered Clery, compliance, data privacy, research, policy, cyber security, emergency management, fraud, and sexual harassment prevention.
- FAMU Management Seminar (April 2024): A mandatory management seminar that covered essential skills for managers, student and employee

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accommodations, employee and student mental health, Clery, active shooter, freedom of assembly, civil discourse, code of conduct, legislative updates, minors on campus, investigations, and customer service.

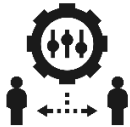
- FAMU Fraud Town Hall entitled focused on strengthening internal controls within the University to prevent and detect fraud. (November 2023)



President Robinson has authorized changes to structure and leadership, such as the development of the University Policy Office, realigning the Office of Equal Opportunity Programs and Risk Management, appointing a Chief Privacy Officer, and hiring a new Chief Operating Officer. Each move was a calculated decision to improve internal controls and operations for which each department or role was responsible for.



The BOT meets regularly as a body and separately with individuals of management to provide administrative oversight of the development and performance of internal controls. Trustees often provide insightful and constructive feedback to assist in improving outcomes. Over the past year the Board has received governance training, public records training, and how to govern in compliance with Sunshine laws.



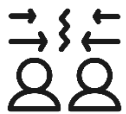
The University has enhanced the onboarding process through a new employee orientation program to set expectations on policy and processes, service excellence to enhance customer service and efficiency of internal control processes and placed a heightened focus on professional development.

The University strives to continuously improve its control environment and move toward an optimized maturity level for all five principles. As a result, areas were identified where opportunities existed to improve the control environment.

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The organization demonstrates a commitment to integrity and ethical values. While these principles are firmly embedded in our culture, there is room for improvement. To enhance our ethical framework, we will ensure continuous promotion and awareness of the Code of Conduct. Additionally, we will provide regular updates and training sessions on ethical behavior and compliance issues. These steps will further strengthen our internal controls and reinforce a culture of accountability and ethical decision-making.



The board of trustees must continually focus on demonstrating independence from management and exercises oversight of the development and performance of internal control. To further enhance these efforts, we aim to improve the effectiveness of board training programs and foster a culture of transparency and accountability through regular reviews. These improvements will ensure that the board is well-equipped to provide robust oversight and that our internal control systems remain effective and responsive to evolving challenges.



Management does establish, with board oversight, structures, reporting lines, and appropriate authorities and responsibilities in the pursuit of objectives. To enhance these efforts, we aim to clarify and streamline reporting lines to reduce bureaucracy and ensure efficiency. Additionally, we will define roles and responsibilities more explicitly to avoid overlaps, coupled with targeted training on these roles and responsibilities. These improvements will foster a more organized and effective operational environment, ultimately supporting the achievement of our objectives.



In the long term, succession planning, underpinned by career development will support effective replacement planning (short term) and transition planning (longer term) of personnel throughout all levels of the University, thereby strengthening continuity and the

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overall capability of Florida A&M University. Continued focus should be placed on fully implementing the succession planning program for the University.



The University is committed to attracting, developing, and retaining competent individuals in alignment with its objectives. To further enhance this commitment, we will address the reduction in productivity caused by departmental politics by ensuring that chairpersons construct Assignment of Responsibility (AORs) that serve the best interests of FAMU. Additionally, we will implement a more structured professional development program. These improvements will create a more cohesive and supportive environment, enabling individuals to thrive and contribute effectively to the university's goals.



The University strives to hold individuals accountable for their internal control responsibilities in the pursuit of objectives. To improve in this area, we need to ensure that performance evaluations account for the performance impact beyond the division of the job assignment, which is currently not occurring. Additionally, updating job descriptions for managers and enhancing training and awareness programs are essential steps. These improvements will foster a more accountable and well-informed workforce, ultimately strengthening our internal control environment and supporting the achievement of our objectives.



RISK ASSESSMENT

Risk is defined by COSO’s Internal Controls – Integrated Framework as the possibility that an event will occur and adversely affect the achievement of objectives. Therefore, like all entities, the University experiences risk at all levels. These risks may result from both positive and negative variances from expectations.

For example, a significant variance in student enrollment projections can have many impacts on the University. If there are significant declines in student enrollment, this could lead to major revenue loss, cancelled courses, or layoffs. Conversely, suppose there are significant increases in student enrollment. In that case, there may not be enough faculty to teach courses, quality of instruction and student engagement may decrease, or physical space constraints may be exceeded in classrooms and housing. Therefore, having sound processes in place for assessing risk throughout the University is vital to the University’s ability to meet its mission and strategic objectives.

The risk assessment component is comprised of the following four principles of control, which were all present and functioning at the University.

	PRINCIPLES OF CONTROL	MATURITY LEVEL
P.6	The organization specifies objectives with sufficient clarity to enable the identification and assessment of risks relating to objectives.	4
P.7	The organization identifies risks to the achievement of its objectives across the entity and analyzes risks as a basis for determining how the risks should be managed. The organization identifies risks to the achievement of its objectives across the entity and analyzes risks as a basis for determining how the risks should be managed.	4
P.8	The organization considers the potential for fraud in assessing risks to the achievement of objectives.	4
P.9	The organization identifies and assesses changes that could significantly impact the system of internal control.	4

An assessment of the University’s risk assessment processes revealed several key strengths, as noted below.

STRENGTHS



The University specifies organizational objectives through its Strategic Plan, Presidential Goals, annual Accountability Plan, and assessment activities for divisions, colleges, and schools.



The University implemented BOT Policy 2020-01: [Fraud Policy](#) in December 2020 that established a zero tolerance for fraudulent, unethical, and dishonest activities. Additionally, the policy established responsibilities for the identification, reporting, and investigation of fraud. The policy was revised in February 2022, to further strengthen the anti-fraud framework at the university by enhancing language around the investigative process of senior University officials (President, Chief Audit Executive, and Chief Compliance and Ethics Officer).



The University conducts enterprise-wide risk assessments using the three functions below.

- **Office of Compliance and Ethics:** Compliance Risk Assessment
- **Division of Audit:** Conducts an annual risk assessment of impacts to internal controls, financial risks, strategic risks, compliance risks, and reputational risks

STRENGTHS

- **Insurance & Risk Management:** Assess risks related to areas covered under the State Risk Management Trust Fund



The Office of Enterprise Risk Management has increased its reporting efforts and over the past year published a PBF Metrics 1 & 2 Risk Profile, Talent Management Risk Profile, and several risk alerts. Additionally, ERM held risk workshops with the senior leadership team, developed a risk reporting hotline, established the Month of February as ERM Awareness Month, conducted risk surveys of faculty and staff, and met regularly through ERM advisory committees to discuss various risks and risk mitigation strategies.



The University's senior leadership team meets as a group weekly to discuss operations and areas of risk throughout the University.



In December 2019, Board of Trustees (BOT) adopted Policy 2019-01 [Internal Controls and Enterprise Risk Management](#) and adopted the Committee of Sponsoring Organizations of the Treadway Commission (COSO) Enterprise Risk Management - Integrating with Strategy and Performance.



The University has established several initiatives to help identify and assess internal controls including the control self-assessment process, Student Success Initiative, Service Excellence Initiative, Artificial Intelligence Initiative (Academic, Microsoft Co-Pilot), HBCU Digital Transformation, and Change Management Initiative.



In collaboration with senior management and the University Board of Trustees, the Chief Risk Officer developed a risk appetite statement. The risk appetite statement approved at the June 2022 board of trustees meeting and will be re-evaluated at the September 2023 board of trustees meeting.



The University implemented an enterprise risk management function in August 2021, in adherence with BOT Policy 2019-01: [Internal Controls and Enterprise Risk Management](#).

The University strives to continuously improve its risk assessment processes and move toward an optimized maturity level for all four principles. As a result, areas were identified where opportunities existed to improve risk assessment.

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The Senior Leadership Team should enhance clarity in specifying objectives to better identify and assess risks.



Division of Audit and Office of Compliance and Ethics should consider providing additional risk management and fraud related training to faculty and staff.



The Office of Enterprise Risk Management should continue to build out the ERM function by developing formal risk monitoring and follow-up processes, conducting bi-annual risk

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surveys, developing a strategic plan risk profile, and completing the risk profiles of the remaining performance-based funding metrics.



The Division of Audit should conduct a strategic plan fraud assessment.



CONTROL ACTIVITIES

Control activities for the University are mechanisms used to manage the achievement of its strategies, performance, and business objectives. The team assessed relevant academic processes (i.e., testing, grading, instruction, privacy, etc.), information technology needs (i.e., virtual meeting platforms, security, hardware, student collaboration tools, etc.), and locations where additional control activities were needed. The control activities component is comprised of the following three principles of control, which were all present and functioning.

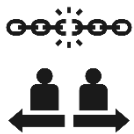
	PRINCIPLES OF CONTROL	MATURITY LEVEL
P.10	The organization selects and develops control activities that contribute to the mitigation of risks to the achievement of objectives to acceptable levels.	4
P.11	The organization selects and develops general control activities over technology to support the achievement of objectives.	4
P.12	The organization deploys control activities through policies that establish what is expected and procedures that put policies into place.	3

There were several strengths noted during the assessment of control activities utilized by the University. Highlighted below were some of the key strengths identified during the assessment.

STRENGTHS



Management considered the regulatory environment, complexity of the higher education industry, and scope of university operations, and our mission to select and develop control activities. This included establishing a Policy Action Committee, Post-Tenure Review Process, and identifying policy owners.



In University areas where staffing is lean, management actively assesses for proper segregation of incompatible duties, and where such segregation is not practical management selects and develops alternative control activities.



The University regularly performs assessments to contribute to the mitigation of risks to the achievement of objectives. Notable assessments include those performed by the Enterprise Risk Management Advisory Committee and the Office of Strategic Planning, Assessment, and Institutional Effectiveness.



The Division of Audit, Office of Compliance and Ethics, Office of Equal Opportunity Programs, and Ombudsman, receives, triages, refers and/or investigates complaints on matters identified within their respective sphere of authority when there are alleged violations of control activities.



Information Technology Services has conducted a cybersecurity tabletop exercise to identify gaps in cybersecurity identification and response processes and joined Florida LambdaRail which utilizes next generation network technologies, protocols and services, FLR facilitates collaboration and academic, scientific, educational, and clinical application development through high-speed communications.

The University strives to continuously improve its control activities and move towards an optimized maturity level for all three principles. As a result, areas were identified where opportunities existed to improve control activities.

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The University should continue building out a comprehensive set of policies and procedures to guide the development and communication of standard IT procedures and technology general controls, along with ensuring alignment with the Cybersecurity Maturity Model Certification.



Management should perform an entity-wide assessment to understand and determine the dependency and linkage between business processes, automated control activities within PeopleSoft, and technology general controls.



Development and training on risk mitigation processes and procedures should be integrated into management practices.



Management should provide additional training, and facilitate automation of key processes using available technology, to staff on the use of technology available to increase efficiencies.



Significant strides are being made in the area of University/Division-wide policy review. An annual mechanism has been established to ensure consistent and timely review. There is a need for greater accountability associated with constituent compliance with established policies.



All divisions, colleges, and schools should perform formal best practices and benchmarking assessments to inform needed changes within policies, procedures, and practices.



INFORMATION & COMMUNICATIONS

Relevant and quality information is imperative to the University’s ability to achieve its strategic, business, and performance objectives. This information may come from internal sources (i.e. employees, information systems, etc.) or externally (regulatory bodies, news, parents, alumni, etc.). Therefore, establishing effective and efficient communications for information to flow throughout the entire organization and between external sources enables clear communication of expectations and requirements. The information and communications component are comprised of the following three principles of control, which were all present and functioning.

	PRINCIPLE OF CONTROL	MATURITY LEVEL
P.13	The organization obtains or generates and uses relevant, quality information to support the functioning of internal control.	4
P.14	The organization internally communicates information, including objectives and responsibilities for internal control, necessary to support the functioning of internal control.	4
P.15	The organization communicates with external parties regarding matters affecting the functioning of internal control.	5

While all principles of the information and communications component were present and functioning, the University exhibited key strengths in the areas below.

STRENGTHS



The University enhanced the new employee orientation process to have regular in-person orientations allowing new employees to meet a variety of leaders throughout campus and learn about key policies, procedures, and processes.



External constituents receive relevant information about matters impacting the University. In addition, Sponsored Research, the Office of Procurement, and the Auxiliary Services Departments timely advise consultants and vendors of relevant expectations and related changes.



Reporting (i.e. Financial Conflict of Interest, Misconduct, Title IX violations, etc.), to appropriate state and federal agencies are made as required.



In support of academic excellence and operational excellence the Office of Communications cultivates and diversifies advocates to advance the University's mission. Communications with students and families are made using a variety of platforms including The Daily Venom, iStrike, Blackboard, social media platforms, and listservs.



The President and his Senior Leadership Team meets weekly to communicate information and actions throughout the University. University experts are regularly invited to the meetings to provide greater insights on topics for informed decision making.

STRENGTHS



The University's Emergency Management Director led efforts to roll-out Everbridge communications app. Everbridge ManageBridge brings Mass Notification, Safety Connection and IT Alerting to administrators who frequently use smartphones and tablets. This app will give FAMU the ability to have a two-way conversation with mobile recipients to provide the eyes and ears on the scene as a situation develops.



The University's Chief Risk Officer developed enterprise risk bulletins and risk alerts to ensure that management received information on risks timely in order to make informed decisions. Additional ERM sub-committees were established to communicate and address risk collaboratively across the institution.

The University strives to continuously improve its processes for communicating and sharing information externally and internally with a goal of increasing the maturity levels for all three principles of the information and communications component. As a result, areas were identified where opportunities existed to improve information and communications.

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There is a heavy reliance on manual processes in key areas of the University. Further automation of processes would increase the timeliness, relevancy, and quality of information available for use and decision making. Effective usage of available technology, such as DocuSign and Qualtrics, can be used to help automate some of these processes.



Enhance performance monitoring and evaluation within academic areas for administration, faculty, and students.



The University is effective at communicating from the senior leadership team to their direct reports through staff meetings. However, improvements could be made to increase informal and formal communication of strategy, expectations, and information impacting business and academic operations to faculty and staff at the director/chair level and below.



Training should be provided on a regular basis to ensure newer university employees are made aware of all relevant policies and procedures.



The University should consider utilizing existing technology, such as Microsoft Teams, to increase communication and sharing of information among management, faculty, and staff.



Communication of key highlights from board of trustees' meetings should be communicated via Daily Venom to ensure all management, faculty, and staff are aware of key changes to policies and procedures, management expectations, changes in leadership, and strategic and business initiatives, goals, and objectives.



A plan should be developed to facilitate the transition from PeopleSoft to another enterprise resource planning system to ensure all phases of an ERP implementation is effectively and efficiently carried out.



MONITORING ACTIVITIES

The COSO Internal Controls – Integrated Framework defines monitoring activities as those activities that assess whether each of the five components of internal control and relevant principles are present and functioning. The University’s monitoring activities (management reviews, internal audit, external audits and reviews, assessments, etc.) assists management in determining whether the system of internal control is effectively addressing current risks and business needs and potential changes that may need implementing to address new risks. The monitoring activities component is comprised of the following two principles of control, which were all present and functioning.

	PRINCIPLE OF CONTROL	MATURITY LEVEL
P.16	The organization selects, develops, and performs ongoing and/or separate evaluations to ascertain whether the components of internal control are present and functioning.	4
P.17	The organization evaluates and communicates internal control deficiencies in a timely manner to those parties responsible for taking corrective action, including senior management and the board of directors, as appropriate.	5

While all principles of the monitoring activities component were present and functioning, there were notable strengths to the University’s efforts in this area.

STRENGTHS



All divisions, colleges, and schools completed annual assessments that are monitored for continuous improvement opportunities. Additionally, all divisions, colleges, and schools were required to complete strategic plans that aligned with the University’s strategic plan.



Management developed action plans for internal control opportunities for improvement identified in the Internal Controls Assurance Statement and actions taken to fulfil plans were monitored by the Division of Audit.



Internal control deficiencies and related correction actions are routinely reported to senior management and the Board of Trustees.



University Policy UP-01-02: [*Internal Controls and Enterprise Risk Management*](#), requires the University to annually provide to the BOT an assurance statement and summary information including an analysis of the University’s systems, controls, and legal compliance. This policy was updated in May 2022 to provide clarity around roles and responsibilities for internal controls and risk management and to further define risk.



The Division of Audit performs an annual risk assessment to guide their assurance and advisory work plan to assesses against criteria established by regulators, oversight bodies, and best practices. The Division of Audit, additionally has an established process to work with management, and other designated personnel, to follow-up on corrective action plans implemented to address noted audit findings and process improvement recommendations.

The University strives to continuously improve its monitoring activities. As a result, areas were identified where opportunities existed to improve monitoring activities.

OPPORTUNITIES FOR IMPROVEMENT



Information and communication systems are monitored and periodically evaluated, but the information from this monitoring is not used to timely update noted deficiencies and often times the changes are cost prohibitive.



Management periodically spots check records to ensure expectations are met. Root causes of issues should be identified and used for continuous improvement.



Internal control monitoring could be improved with the establishment of key risk indicators and key performance indicators that could be monitored through dashboards.



Management should ensure timely communication of internal control deficiencies and corrective actions to responsible parties.