

**Report No. 24-25-0007**  
**Assurance Services Report**  
**Foreign Influence Audit**



**ACCOUNTABILITY • INTEGRITY • EFFICIENCY**

**June 30, 2025**



## EXECUTIVE SUMMARY

On June 7, 2021, the Governor of the State of Florida signed sweeping new provisions into law governing research activities at State universities to protect them from foreign influence, including:

- **Section 1010.35, Florida Statutes - Screening foreign researchers:** Requires evaluation of hiring candidates for research-related positions prior to appointment and additional background screening for those who meet evaluation criteria.
- **Section 1010.36, Florida Statutes - Foreign travel; research institutions:** Requires an international travel and monitoring program for employment-related travel by University's researchers.
- **Section 1010.25, Florida Statutes - Foreign gift reporting:** Requires semi-annual reporting of foreign-source gifts exceeding \$50,000 (singly or in aggregate). The statutory definition of gift includes contracts with foreign entities and individuals or agents acting on their behalf.

The depth and complexity of the associated compliance requirements necessitates coordination across a broad range of organizational functions. This coordination has proven challenging, despite the efforts of the following offices to establish oversight processes:

- Research Compliance (screening foreign researchers, approving travel).
- International Education and Development (approving travel).
- Compliance and Ethics (foreign gift reporting).

























Our audit found multiple examples of fragmented roles and responsibilities, partially established controls and incomplete monitoring data, as well as some instances of non-compliance. Enhanced systems, data gathering, cross-functional collaboration and greater definition of roles and responsibilities in policies and internal operating procedures (IOPs) are needed to establish a mature system of internal controls. Without it, future compliance with the statutory requirements related to screening of foreign researchers, foreign travel, and foreign gift reporting cannot be assured.

We commend the Office of Research Compliance (ORC), Office of International Education and Development (OIED) and Office of Compliance and Ethics (OCE) for the leadership they have shown by actively participating in our audit and leveraging our observations in real time to broker conversations across separate functions. These conversations have served as the catalyst for substantial corrective actions already underway.

The following table summarizes our observations.


















Screening Researchers		
	<b>Screening process established.</b> ORC has established a process for screening candidates identified by hiring departments as meeting the screening criteria established by statute.	
	<b>Initial evaluations and referrals for screening not performed.</b> Departments have not consistently performed initial evaluations or referred job candidates for screening. Out of 75 hires sampled, 18 were determined to have met the criteria but were not referred to ORC for screening; another 37 candidates had not been evaluated.	
	<b>Absence of current project data.</b> ORC does not have access to up-to-date project-level data, limiting its ability to verify whether all individuals with access to research activities have been appropriately screened.	
	<b>Policies and procedures not fully developed.</b> The University has not developed a written policy to define roles and responsibilities for initial evaluations, referrals, and final screening. ORC is in the process of developing IOPs to support final screening.	
Foreign Travel		
	<b>University travel policy adopted.</b> University Policy UP-04-06 International Travel was adopted on February 23, 2024, providing written guidance regarding roles, responsibilities, and expectations.	
	<b>Pre-approval requirements met.</b> The attestation language included above the traveler's signature on the Request for Travel form meets the statutory requirements for pre-approval. <sup>1</sup>	
	<b>Sufficient controls over approvals for University-funded travel.</b> The process for approving University-funded travel includes routing trip and budgetary details through iRattler, subject to Travel Office oversight.	
	<b>Fragmentation of processes, data and recordkeeping.</b> Different approval processes, exist for different funding sources, supported by different degrees of data accessibility and internal control.	
	<b>Insufficient controls over Approvals for Foundation-funded travel.</b> The process for approving Foundation-funded travel does not have sufficient controls to ensure review and approval by the Research Integrity Officer.	
	<b>Absence of data to support screening.</b> ORC is unable to verify travelers' current research assignments, including associated funding sources and applicable regulations.	
	<b>Travelers not required to register with International SOS.</b> OIED has not enforced the requirement for travelers to register with International SOS <sup>2</sup> , limiting the University's ability to maintain a centralized data source for effective monitoring and reporting.	
	<b>Unreported trip.</b> We identified one instance of a trip to a foreign country of concern (China) that was not included in the annual report required by Section 1010.36, F.S.	

<sup>1</sup> Defined as the traveler's acknowledgment of, and binding commitment to follow University guidance and applicable State and Federal laws.

<sup>2</sup> Per University Policy UP-04-06 International Travel Section II.6. International SOS Ltd. is the University's travel assistance provider.



Foreign Gift Reporting						
	<b>Reporting process established.</b> OCE has established a process for contacting a broad range of stakeholders, providing instructions, gathering information, and compiling reports.					
	<b>Reports filed timely.</b> Reports are being filed semi-annually by July and January 31 of each year, in the format prescribed by the Board of Governors (BOG) Office of Inspector General and Director of Compliance (OIGC).					
	<b>Controls in place over reporting traditional gifts.</b> The Foundation serves as the gatekeeper for recording all gifts received by the University and its affiliates that meet traditional accounting definitions, as opposed to procurement contracts, which are included in the statutory definition of gift.					
	<b>Screening controls for foreign source contracts need to be improved.</b> OCE relies on departments to self-report foreign source contracts included under the Section 1010.25, F.S., definition of reportable gifts. Departments may not have adequate time, expertise, access to research tools, training or support to correctly identify contractual parties serving as agents of a foreign source (including subsidiaries and affiliates).					
	<b>Policies and procedures not fully developed.</b> The University has not developed its own foreign gift reporting policy to define roles and responsibilities. OCE is in the process of developing IOPs related to the foreign gift reporting process.					
Legend:		Controls are in place & operating effectively		Controls are partially in place and/or not operating effectively		Controls are not in place



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## BACKGROUND

### Purpose of Audit

Both Section 1010.35, F.S., (Screening foreign researchers) and Section 1010.36, F.S., (Foreign travel; research institutions) require operational audits of implementation of their requirements to be completed by July 1, 2025. This audit was also performed as a follow-up to a prior audit report<sup>3</sup> that covered the gift reporting requirements of Section 117 of the Higher Education Act. The more stringent requirements of 1010.25, F.S. (Foreign gift reporting) also fulfill federal reporting requirements: the U.S. Department of Education accepts reports prepared under Florida statute in lieu of Section 117.

### Florida's Foreign Influence Statutes

In 2021, the State of Florida enacted a series of statutes to protect the integrity of research conducted at its universities. These statutes include:

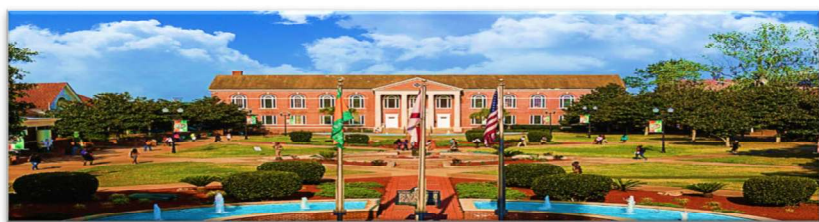
- **Section 1010.35, F.S., Screening foreign researchers.** Requires the University to perform additional background screening, including employment history, publication history, current project activity and funding sources, and affiliations with non-University professional associations, prior to hiring job candidates<sup>4</sup> for research positions who meet either of the following criteria:
  - Foreign national without permanent U.S. residency.
  - At least one year of work or study experience in a foreign country of concern, as defined at 286.101, F.S. (China, Russia, North Korea, Iran, Syria, Venezuela, Cuba).
- **Section 1010.36, F.S., Foreign travel; research institutions.** Requires the University to establish an international travel approval and monitoring program for employment-related travel by faculty, researchers, and research department staff. As a form of “pre-approval,” travelers must attest that they have reviewed University guidance and agree to abide by all applicable laws while traveling. The University’s designated Research Integrity Officer<sup>5</sup> must screen and approve all travel in addition to all other approvals required by the University’s standard travel process. Any travel to a foreign country of concern must be reported annually to either the Board of Trustees (BOT) or Board of Governors (BOG).
- **Section 1010.25, F.S., Foreign gift reporting.** Requires the University to semiannually report all gifts received from foreign sources exceeding \$50,000 singly or in aggregate. The statutory definitions of “gift” and “foreign source” are as follows:
  - **Gifts**
    - Gifts of money, property, or a combination of both, including conditional or unconditional pledges.
    - Procurement contracts to purchase goods and services (e.g., from the University, or for the University to purchase goods or services from a foreign country of concern).

<sup>3</sup> Report No. 20-21-008 Federal Contracts and Grants Disclosures (June 11, 2021).

<sup>4</sup> Including graduate and undergraduate students seeking appointment to research-related support positions.

<sup>5</sup> A Delegation of Authority Memorandum dated July 30, 2021 from President Larry Robinson to Dr. Tanise Jackson, Director, Office of Animal Welfare and Research Integrity (OAWRI), designates OAWRI as the University’s Research Integrity Office. The name of the office has since been changed to Research Compliance but the memo has not been updated. Dr. Jackson continues to serve as Research Integrity Officer.





○ **Foreign Source**

- Foreign entities, including governmental, for-profit, and nonprofit entities and citizens.
- Agents acting on behalf of foreign entities or individuals, including subsidiaries and affiliates.

### Regulations and Policies

**BOG Regulation 9.012** adopts the requirements of s. Section 1010.25, F.S.; Section 1010.35, F.S.; and Section 1010.36, F.S., as described above.

**University Policy UP-04-06 International Travel** requires all international travel to be approved by the traveler's dean or supervisor, Office of Research Compliance (ORC), Office of International Education and Development (OIED), and the Travel Office and travelers to register with the University's travel assistance provider, International SOS. If the traveler plans to spend more than 30 days in any single location, the Provost must also approve. Furthermore, the policy provides a suggested list of considerations for foreign influence screening, including academic relevance, urgency and compliance with federal and state regulations.

**BOT Policy 2019-01 Internal Controls and Enterprise Risk Management (ERM)** establishes the University's adoption of the Committee of Sponsoring Organizations (COSO) internal control framework.<sup>6</sup> The framework provides a roadmap for organizations to design, implement, and assess internal controls that will be effective at safeguarding their objectives. It consists of the following five (5) primary components, which are supported by 19 principles<sup>7</sup>:

1. Control Environment – Encompasses principles of ethics and integrity, as well as assigning roles and responsibilities, hiring and training staff, and providing timely performance feedback. Ensures that business processes are based on industry standards and that management has put in place policies and procedures to guide the organization.
2. Risk Assessment – Addresses identifying, analyzing and responding to potential risks to objectives.
3. Control Activities – Ensures processes are designed and implemented to meet business objectives, including developing policies, procedures and information systems.
4. Information and Communication – Ensures that communications adhere to legal requirements, ethical values, and standard industry practices. Requires the use of quality information to communicate to internal and external stakeholders.
5. Monitoring Activities – Ensure ongoing and/or separate evaluations are conducted to assess the quality of the control system's performance over time. Discusses the need to monitor results and take corrective actions if necessary.

<sup>6</sup>The COSO framework is the most widely recognized framework in the United States. It instructs management to look beyond specific policies and procedures to overarching considerations such as defining goals, planning, staffing, assessing risks to desired outcomes, communicating, and monitoring the implementation and effectiveness policies and procedures. The Executive Summary can be downloaded at [Executive Summary \(coso.org\)](https://www.coso.org/ExecutiveSummary). More detail can be found in the free public guide, tailored to the public sector, published by the U.S. General Accountability Office at [Standards for Internal Control in the Federal Government | U.S. GAO](https://www.gao.gov/publications/standards_for_internal_control_in_the_federal_government).

<sup>7</sup> This summary based on BOT 2019-01 and the [Standards for Internal Control in the Federal Government](https://www.gao.gov/publications/standards_for_internal_control_in_the_federal_government).



## PROCESSES AND OUTCOMES

### Screening Foreign Researchers – Process Overview

**Initial Evaluation.** Candidates for research-related positions must be evaluated to determine whether they meet the screening criteria set by Section 1010.35, F.S., – specifically, whether they are a foreign citizen or have at least one year of work or study experience in a foreign country of concern. Responsibility for performing initial evaluations has been decentralized to multiple departments; if a candidate meets the screening criteria, the department performing the evaluation must refer the candidate to ORC for final screening:

- The Office of the Provost evaluates faculty candidates and sends out appointment letters, as opposed to Human Resources (HR) sending out offer letters. Once the candidate accepts an appointment, the Office of the Provost notifies HR to add the new faculty member to the payroll system.
- Colleges and schools evaluate graduate and undergraduate students at time of admission to ensure their future eligibility for research assistantships, rather than at the time of appointment to a particular assistantship. With the exception of the FAMU-FSU College of Engineering, evaluation questions and responses are stored in CollegeNet. Depending on the length of a student’s academic career at FAMU, the information collected at the time of admission may become outdated over time.
- HR evaluates candidates for all other research-related positions. Prior to December 10, 2024, final candidates for employment were sent a link to fill out a survey in PeopleSoft containing the evaluation questions. Use of this survey has been discontinued; ORC is in process of developing a new form to assist departments.
- The FAMU-FSU College of Engineering follows its own unique processes.<sup>8</sup> FAMU relies on FSU’s initial evaluation and final screening process for persons hired by FSU but added to FAMU’s payroll system. For example, an FSU faculty member may teach a summer session as an OPS (Other Personal Services) employee of FAMU.

Because the Division of Research does not maintain a database of active projects and associated personnel, ORC is unable to effectively monitor whether all persons granted research access have been screened. ORC relies on a list of Job Codes to identify research-related positions but does not receive automatic notifications from HR when research-related positions are filled.

**Final Screening.** Once ORC receives a referral for screening, they review the candidate’s background, publication history, and other information specified by Section 1010.35, F.S., ORC assumed this function in July 2024 and hired an additional staff member in October 2024 to help establish the policies and procedures. ORC also began using an external service, Accurate Background, to perform many of the required background checks.

<sup>8</sup> A July 2018 Memorandum of Agreement designates FSU as the fiscal agent responsible for the financial administration and operations of the FAMU/FSU Joint College of Engineering.





### Screening Foreign Researchers – Process Review Outcomes

The decentralized referral process for screening is not functioning effectively. Our testing indicates that stakeholders either do not consistently evaluate whether candidates meet the screening criteria or they do not make the required referral to ORC after confirming.

- For 37 out of 75 candidates (7 faculty, 30 students), there were missing or incomplete records of an initial evaluation being performed, accompanied by no record of further referral to ORC.
- For 18 graduate students who met screening criteria at time of admission (16 foreign nationals and 2 applicants who reported work/study experience in a foreign country of concern), there was no record of referral to ORC for screening.

During our review we also noted an evaluation had been completed for a candidate associated with a different Job Code than found on this list. We inquired with the Chief Compliance and Ethics Officer, who is also the author of the process flow chart, and confirmed the flowchart needs to be updated.

### Screening Foreign Researchers – Summary of Conditions and Recommendations

Condition	Recommendation
<b>Initial Evaluations and Referrals for Screening Not Performed</b>	The Research Integrity Officer should work with the Director of Human Resources (HR) to implement a process to ensure all initial evaluation results are communicated to ORC. <sup>9</sup> HR should not finalize hiring or payroll actions without ORC clearance. ORC should develop a centralized tracking system to record evaluations, referrals, and final screening outcomes. It should use this system to verify that graduate student screening information remains current. It should coordinate with the Office of the Dean of the FAMU-FSU College of Engineering when necessary to confirm evidence of evaluation and screening of shared employees.
<b>Absence of Current Project Staffing Data</b>	The Research Integrity Officer should work with the Director of the Office of Sponsored Programs (OSP) and the Director of the Office Institutional Research & Analytics (OIRA) to establish a data-sharing process that provides regular updates on active projects, including staff names, roles, and job codes.
<b>Policies and Procedures Not Fully Developed</b>	The Research Integrity Officer should collaborate with the Chief Policy Officer and relevant stakeholders (including HR, Academic Affairs, and Council of Academic Deans) to develop a policy defining shared roles and responsibilities. ORC should develop written internal operating procedures (IOPs), including a final screening checklist that covers all state-required screening components not currently supported by its external vendor, Accurate Background.

For details see Corrective Action Plan in Appendix B.

<sup>9</sup> Including, if necessary, by FSU through the Office of the Dean of the joint College of Engineering.



## Foreign Travel Approval and Monitoring – Process Overview

The University follows different approval and monitoring processes for international travel depending on the funding source:

- **University-funded travel.**
  - *Pre-approval.* The approval process begins when the traveler and dean manually sign the University's Request for Travel (RFT) form. The traveler signs directly beneath an acknowledgment that they have read and reviewed the University's guidance and commit to following all applicable policies, procedures and federal and state laws while travelling. This acknowledgment meets the "pre-approval" requirements of Section 1010.36, F.S.
  - *Approval Workflow.* The department travel representative uploads the RFT form to iRattler, enters budgetary line items, and routes the travel request for additional approvals by OIED, ORC, the Provost, President, and Travel Office<sup>10</sup>. OEID checks travel destinations against State Department travel advisories and coordinates with International SOS.
  - *Foreign Influence Screening.* As the designated Research Integrity Office, ORC bears responsibility for the screening component of Section 1010.36, F.S., which should be performed in addition to all other travel approvals performed by the University. However, without access to real-time project-level data, including staff assignments by project, ORC's ability to screen travelers in accordance with funding-specific requirements is hindered.
- **Foundation-funded travel.** Departmental travel representatives route RFT forms for additional signatures in DocuSign. The Travel Office does not review, approve or monitor Foundation-funded travel requests.
- **Complimentary travel.** Instead of RFT forms, students complete Complimentary Travel forms to obtain approvals for study abroad. The University has not considered the possibility that an employee, as opposed to a student, might be sponsored by an external party to travel (e.g., to make a presentation at a conference). Section 1010.36, F.S., sets forth specific recordkeeping requirements for sponsored travel by employees, including retention of all receipts. These responsibilities have not been assigned.

## Foreign Travel Approval and Monitoring – Process Outcomes

For University-funded travel, we obtained an export of 68 travel authorizations from iRattler for FY 2023-2024 from ORC. We compared this data to travel itinerary data provided by International SOS for trips commenced in FY 2023-2024 and only identified 12 matches (17.6%). We confirmed with OIED that, although SOS registration is required per policy, it has not been enforced in practice, limiting the system's usefulness as a repository of data.

During our review of the travel authorization data, we noted a trip to China that according to International SOS, occurred between June and August 2023. However, according to iRattler, the trip to China occurred in September 2023. A note attached to the iRattler record clarified the

<sup>10</sup> University Policy UP-04-06 International Travel Section II.B requires the signatures of traveler, dean, OIED, ORC and Travel Office. Section II.C states additional approvals may be required by Provost (if travel to exceed 30 days to any one location) and Export Control (currently housed under ORC). In practice, the President's signature is included on the RFT forms.



actual travel dates and explained that the record was created retroactively as a workaround due to a system closeout at fiscal year-end. The DocuSign form uploaded in the system had been signed in advance by OIED, Provost, and President but not by ORC until the request was eventually entered in iRattler. We verified with the Office of Compliance and Ethics (OCE) that OIED had not confirmed any trips to countries of concern in either FY 2022-2023 or FY 2023-2024. As result, the trip was not included in the annual report required by Section 1010.36, F.S.

For Foundation-funded travel, we were unable to obtain travel activity data from DocuSign in a readily usable format. We confirmed with the Foundation that, during the audit period, it requested copies of the RFT forms to validate cash advance or expense reimbursement (after-the-fact) requests. However, the Foundation only inspected the forms for the President's signature. To illustrate their process, Foundation staff provided two expense reimbursement packets for trips completed in October and November 2024. Both packets contained an RFT form that were missing the Research Integrity Officer's signature. We examined online guidance available to departmental travel representatives processing approvals through DocuSign and discovered an outdated "Step-by-Step Guide" on the OIED website. This guide, which is referenced by a training presentation on ORC's website, does not mention the requirement for ORC approval.

### Foreign Travel – Summary of Conditions and Recommendations

Condition	Recommendation
<b>Fragmented processes, data, and recordkeeping</b>	The Chief Operating Officer (COO) should discuss the integration of all travel approvals into a single system with the Controller. In the meantime, the Assistant Vice President (AVP) of OIED should implement a centralized logging process for all travel types. The COO should work with the Chief Policy Officer to define recordkeeping responsibilities for complimentary travel by employees.
<b>Insufficient controls over approvals for Foundation-funded travel</b>	The Research Integrity Officer should work with the AVP of OIED to establish a formal workflow and written procedures to ensure all required approvals, including ORC and Travel Office signatures, are obtained before travel. The Research Integrity Officer should provide the correct RFT form to the Foundation and request verification of all signatures prior to processing payments.
<b>Absence of data to support screening</b>	The Research Integrity Officer should work with the Director of OSP and the Director of OIRA to establish a data-sharing process that provides updated information on project assignments, personnel, and funding sources.
<b>Travelers not required to register with International SOS</b>	The AVP of OIED should require travelers to provide proof of registration with International SOS prior to approving travel.
<b>Unreported trip</b>	The Chief Compliance and Ethics Officer should ensure OCE uses its recently granted access to the International SOS dashboard to independently verify international travel data. OCE should also include any unreported travel in the next annual report. <sup>11</sup>

For details see Corrective Action Plan in Appendix B.

<sup>11</sup> Per recent advice of OIGC to OCE.





### Foreign Gift Reporting – Process Overview

Soon after the close of each six-month reporting period (June 30 and December 31), OCE contacts stakeholders across the University to request information to report, including:

- **FAMU Foundation**, which serves as the official gateway for receiving gifts on behalf of the University. The Foundation also serves as the recordkeeping agent for the University’s auxiliary organizations – the National Alumni Association and the Boosters.
- **University Advancement**, which coordinates closely with the Foundation.
- **Other University Offices:**
  - Controller,
  - Procurement.
  - Sponsored Research,
  - OIED,
  - Financial Aid,
  - Student Financial Services, and
  - Enterprise Risk Management.

OCE compiles the semi-annual reports from the information it receives back from the requests, which include the Office of Inspector General and Director of Compliance (OIGC) reporting template as an attachment. The instructions tab on the template contains a detailed list of statutory definitions for:

- **Gift.** Includes any contract, gift, grant, endowment, award, or donation of money or property of any kind, including a conditional or unconditional pledge.
- **Contract.** Includes any “agreement for the acquisition by purchase, lease, or barter of property or services by the foreign source...and any purchase, lease or barter of property or services from a foreign country of concern.”<sup>12</sup>
- **Foreign Source.** Includes a governmental entity, any other entity organized exclusively under foreign laws, a foreign national, or an agent, including a subsidiary or an affiliate of a foreign legal entity, acting on behalf of a foreign source.

### Foreign Gift Reporting – Process Outcomes

We obtained reports filed for the reporting periods ending June 30 and December 31, 2024. We determined OCE had filed both reports timely (by July 31 and January 31), using the templates and the reporting portal prescribed by the OIGC. No gifts were reported on either report except a set of student sponsorships paid for by the Saudi government.

We contacted the Foundation and confirmed they would process all types of gifts included in the statutory definition except contracts. We met with Ms. Danielle Hurd, Gift Reporting Coordinator, at the Foundation offices on May 7, 2025, to observe her query system data and filter it for foreign sources. Three gifts totaling under \$5,000 were returned by the query.

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<sup>12</sup> Section 1010.25, F.S., paragraph 1(b).



We were unable to obtain contractual party data to select a risk-based sample to evaluate for foreign affiliations due to the University's lack of a contract management system.<sup>13</sup> We contacted the Office of General Counsel (OGC) for a list of contracts and were referred to the Office of Procurement Services (Procurement Services). We also contacted the Office of Technology Transfer, which informed us its list was in the process of being updated. ORC, which now manages Export Control, informed us there are no open export contracts at this time.

### **Foreign Gift Reporting – Summary of Conditions and Recommendations**

Condition	Recommendation
<b>Insufficient screening controls for foreign source contracts</b>	The COO should consult with the President and Chief Compliance and Ethics Officer to determine who should be assigned responsibility for establishing a centralized process to screen contractual parties for potential foreign influence risks. This process should be housed within an existing contract review function and supported by a licensed screening service (e.g., Dow Jones add-on for Visual Compliance) to assess ownership, political exposure, and other high-risk associations.
<b>Lack of documented IOPs</b>	The Chief Compliance and Ethics Officer should collaborate with the Chief Policy Officer to develop a policy defining roles and responsibilities for foreign gift reporting. OCE should complete the documentation of internal procedures for foreign gift reporting.

For details see Corrective Action Plan in Appendix B.

<sup>13</sup> As noted in Report No. 22-23-001 Office of Procurement Services Consulting Services Report (September 27, 2022). A corrective action from that report remains outstanding.



## CONCLUSION ON EFFECTIVENESS

The Institute of Internal Auditor's Global Standard 15.1 requires the Division of Audit to communicate "a conclusion regarding the effectiveness of the governance, risk management, and control processes of the activity reviewed." Rating the levels of effectiveness of an operational process can be based on a combination of objective metrics and subjective assessments. For purposes of this audit, the following terms are used to describe each level, from least effective to most effective:

1. **Ineffective:** The process fails to meet the required objectives. There are significant issues that need immediate attention.
2. **Needs Improvement:** The process meets some objectives but has several areas that require improvement to be fully effective.
3. **Effective:** The process meets the required objectives. It operates efficiently but may have minor areas for improvement.
4. **Highly Effective:** The process exceeds the required objectives. It operates very efficiently and is considered a best practice.
5. **Outstanding:** The process is exemplary and sets a benchmark for others. It consistently delivers exceptional results and is highly efficient.

Governance, Risk Management and Internal Control over Foreign Influence Practices		
Processes	Level of Effectiveness	Supporting Details
<b>Governance</b>	Needs Improvement	<p>The decentralization of key processes without central coordination or oversight undermines their effectiveness, including:</p> <ul style="list-style-type: none"> <li>• Evaluation of hiring candidates for screening requirements by multiple departments, who sometimes neglect to perform evaluations or make screening referrals to ORC.</li> <li>• Processing travel approvals for Foundation-funded travel by departmental representatives without Travel Office oversight, sometimes resulting in missing approvals.</li> <li>• Screening of contractual parties for foreign influence factors under foreign gift reporting rules by departments without legal or other assistance, potentially resulting in underreporting.</li> </ul>
<b>Risk Management</b>	Needs Improvement	<p>The lack of monitoring data undermines risk management, including:</p> <ul style="list-style-type: none"> <li>• The lack of comprehensive project data, including persons granted access, funding sources, and risk-based rankings regarding the sensitivity of the research.</li> <li>• The lack of comprehensive travel data for University travelers, regardless of funding source.</li> <li>• The lack of a contract management system identifying who the University is doing business with across departments.</li> </ul>
<b>Internal Control</b>	Needs Improvement	<p>Formal processes and procedures, including definition of roles and responsibilities, need to be established for:</p> <ul style="list-style-type: none"> <li>• Evaluation/screening of candidates for research-related positions.</li> <li>• Approving Foundation-funded travel.</li> <li>• Compiling information for foreign gift reports.</li> </ul>





## APPENDIX A: PURPOSE, SCOPE, AND METHODOLOGY

### Purpose and Scope

The purpose of this audit was to evaluate the University's compliance with the following statutes:

- **Section 1010.35, F.S., Screening foreign researchers**, which requires in-depth background screening of any person who is a foreign citizen or has more than one year's experience of work or study in a country of concern identified in Section 286.101, F.S., Foreign Gifts and Contracts (China, Russia, North Korea, Iran, Syria, Venezuela or Cuba) prior to appointment to a research-related position. To provide timelier information regarding a changing business process, the scope of testing was moved up from fiscal year 2023 – 2024 to calendar year 2024.
- **Section 1010.36, F.S., Foreign travel; research institutions**, which requires the University to implement an international travel and monitoring program for employment-related travel engaged in by all faculty, researchers, and research department staff. The scope of testing was fiscal year 2023 – 2024.
- **1010.25, F.S. Foreign gift reporting**, which requires all gifts of \$50,000 or more either singly or in aggregate from a foreign source to be reported semi-annually. The statutory definition of gift includes procurement contracts by a foreign source to purchase goods or services from the University, or by the University to purchase goods or services from a foreign country of concern. The scope of testing was updated to calendar year 2024 upon submission of the most recent report in January 2024.

### Methodology:

We applied the following procedures throughout our audit:

- **Review of Applicable Criteria.** We researched applicable federal laws, state statutes, BOG regulations, University regulations, BOT policies, and available guidance published by OIGC, the Foundation, OCE, OIED, ORC and the Travel Office.
- **Interviews with Key Stakeholders.** We interviewed and/or corresponded with a wide range of University stakeholders, including subject matter experts in HR, FAMU-FSU College of Engineering, the Foundation, OCE, Office of the Provost, OIED, ORC, and the Travel Office.
- **Process walkthroughs.** We met with a departmental travel representative to walk through the travel approval process for University-funded travel. We met with a Foundation representative to pull gift reporting data from their donor management system.
- **Data analysis.** We reviewed and filtered data on personnel actions exported from PeopleSoft. We compared travel authorization data exported from the iRattler travel to trip itinerary data exported from International SOS' system.
- **Examination of Documentation and Processes.** We obtained and reviewed documentation stored in CollegeNet, Docusign, iRattler, Peoplesoft and at the Foundation.



## APPENDIX B: MANAGEMENT'S RESPONSE

Docusign Envelope ID: 6152E680-3950-48EE-A23A-1ACAC4DA213F



FLORIDA A&M UNIVERSITY  
DIVISION OF AUDIT



**To:** Dr. Donald E. Palm III, Executive Vice President and Chief Operating Officer  
Dr. Charles A. Weatherford, Vice President, Research  
Dr. Tanise Jackson, Director, Research Compliance and Research Integrity Officer  
Dr. Allyson Watson, Provost and Vice President, Academic Affairs  
Dr. William T. Hyndman III, Assistant Vice President, OIED  
Rica Calhoun, Chief Compliance and Ethics Officer

**From:** Joseph Maleszewski, Vice President for Audit and Chief Audit Executive

**CC:** Trystal Wright, Audit Director  
Chathya Chandler, Audit Manager  
Nancy Shepherd, Lead Senior Auditor

**Date:** June 3, 2025

**Re:** Request for Corrective Action Plan: Report 24-25-006 Foreign Influence Audit

We appreciate the cooperation of you and your teams during the recent 24-25 Foreign Influence Audit. The audit report you received includes observations and recommendations aimed at enhancing the operations, internal controls, and compliance within your departments related to Florida's foreign influence statutes:

- Section 1010.35, F.S., Screening foreign researchers,
- Section 1010.36, F.S., Foreign travel; research institutions, and
- Section 1010.25, F.S., Foreign gift reporting.

The attached Corrective Action Form lists our observations and provides room for assigning a responsible manager and entering a corrective action plan and due date. **We are requesting the Research Integrity Officer to coordinate responses, obtain senior management's review and signature, and return the completed form to us by June 17, 2025.** Each corrective action plan should include at a minimum the following items:

- Management's planned action to develop, or improve, controls related to the observations;
- Responsible party for each planned management action; and
- Expected completion date for each planned management action.

In accordance with Division of Audit's charter, we will be performing quarterly follow-up reviews of the corrective actions on or immediately after the target completion dates you provide in the Corrective Action Plan below. Our follow-up reviews are to determine the status and the effectiveness of the implementation of the corrective actions.

Please let us know if you have any questions or concerns. Thanks.





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Issue	DoA Recommendations	Corrective Action Plan
<b>Screening Foreign Researchers</b>		
<b>Initial evaluations and referrals for screening not performed.</b> Departments have not consistently performed initial evaluations or referred job candidates for screening. Out of 75 hires sampled, 18 were determined to have met the criteria but were not referred to the ORC for screening; another 35 had not been evaluated.	The Research Integrity Officer should work with the Director of Human Resources (HR) to implement a process to ensure all initial evaluation results are communicated to ORC. <sup>1</sup> HR should not finalize hiring or payroll actions without ORC clearance. ORC should develop a centralized tracking system to record evaluations, referrals, and final screening outcomes. It should use this system to verify that graduate student screening information remains current. It should coordinate with the Office of the Dean of the FAMU-FSU College of Engineering when necessary to confirm evidence of evaluation and screening of shared employees.	<p><b>COMPLETED</b></p> <p><b>Foreign Influence Screening Process</b></p> <p>This document outlines the Foreign Influence Screening process for faculty and staff requesting review of a potential candidate. All steps ensure compliance with institutional, state, and federal guidelines.</p> <p><b>Process Overview</b></p> <ol style="list-style-type: none"> <li>1. Faculty or staff completes the Qualtrics survey for the potential candidate.</li> <li>2. All Qualtrics submissions are automatically filtered to the Foreign Influence email account.</li> <li>3. Each submission is reviewed and assessed to determine if it should be processed via our vendor Accurate or omitted for the 1010.35 exemption.</li> <li>4. All parties involved receive an email update on the status of the screening process. Estimated processing time is 5–10 business days.</li> <li>5. If additional review is required, the submission is forwarded to the Office of Compliance and Ethics. The candidate is sent to the BOT for approval first and then, if approved, put on the BOG agenda for consideration.</li> </ol> <p><b>Responsible Party:</b> ORC</p> <p><b>Implementation Date:</b> February 2025</p> <p><b>Resources Required for Implementation:</b> (Examples: Additional Personnel, New Technology, New Process or Workflow, etc.) Already added to Workday</p>
<b>Absence of current project data.</b> The ORC does not have access to up-to-date project-level data, limiting its ability to verify whether all individuals with access to research activities have been appropriately screened.	The Research Integrity Officer should work with the Director of the Office of Sponsored Programs (OSP) and the Director of the Office Institutional Research & Analytics (OIRA) to establish a data-sharing process that provides regular updates on active projects, including staff names, roles, and job codes.	<p><b>COMPLETED</b></p> <ol style="list-style-type: none"> <li>1. The ORC is currently collaborating with OIRA and receives a monthly FAM Active Grant Report. This report includes key details such as the effective date, department ID and name, job code and description, position number, HR status, group status, FAM certification department, plan exit date, budget weeks, budget entity, project number, time report status, project ID, sponsor name, award start and end dates, principal investigator (PI) name, and project type.</li> </ol> <p><b>Responsible Party:</b> ORC</p> <p><b>Implementation Date:</b> April 2025</p> <p><b>Resources Required for Implementation:</b> New Process</p>
<b>Policies and procedures not fully developed.</b> The University has not developed a written policy to define roles and responsibilities	The Research Integrity Officer should collaborate with the Chief Policy Officer and relevant stakeholders (including HR, Academic Affairs, and Council of Academic Deans) to develop a policy defining shared roles and responsibilities. ORC should develop written internal operating procedures (IOPs),	<ol style="list-style-type: none"> <li>1. The Research Integrity Officer will collaborate with OCE, the Chief Policy Officer, and other relevant stakeholders to develop a policy defining shared roles and responsibilities in screening.</li> <li>2. A written internal foreign researcher screening procedures including screening checklist have been completed and posted on <a href="#">Division of Research's website</a>.</li> <li>3. ORC will collaborate with OCE to ensure that all state-required screening components are covered either by Accurate Background or through alternative methods.</li> </ol>

<sup>1</sup> Including, if necessary, by FSU through the Office of the Dean of the joint College of Engineering.





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Issue	DoA Recommendations	Corrective Action Plan
for initial evaluations, referrals, and final screening. The ORC is in the process of developing IOPs to support final screening.	including a final screening checklist that covers all state-required screening components not currently supported by its external vendor, Accurate Background.	<p><b>Responsible Party:</b> ORC and OCE</p> <p><b>Implementation Date:</b> 1. December 31, 2025, 2. Completed 3. July 31, 2025</p> <p><b>Resources Required for Implementation:</b> New Process</p>
<b>Foreign Travel</b>		
<b>Fragmentation of processes, data and recordkeeping.</b> Different approval processes, exist for different funding sources, supported by different degrees of data accessibility and internal control.	The Chief Operating Officer (COO) should discuss the integration of all travel approvals into a single system with the Controller. In the meantime, the Assistant Vice President (AVP) of OIED should implement a centralized logging process for all travel types. The COO should work with the Chief Policy Officer to define recordkeeping responsibilities for complimentary travel by employees.	<ol style="list-style-type: none"> <li>1. A single IRT form will be used for all international travel. (employment-related, University-organized, University-funded or study-abroad or complimentary). The form will be sent via DocuSign to the assigned approvers before processing. (iRattler, Foundation Funded or Complimentary)</li> <li>2. An excel spreadsheet will be kept in the OIED office of all international travel.</li> </ol> <p><b>Responsible Party:</b> Dr. William Hyndman</p> <p><b>Implementation Date:</b> July 2025</p> <p><b>Resources Required for Implementation:</b> New Process</p>
<b>Insufficient controls over Approvals for Foundation-funded travel.</b> The process for approving Foundation-funded travel does not have sufficient controls to ensure review and approval by the Research Integrity Officer.	The Research Integrity Officer should work with the AVP of OIED to establish a formal workflow and written procedures to ensure all required approvals, including ORC and Travel Office signatures, are obtained before travel. The Research Integrity Officer should provide the correct RFT form to the Foundation and request verification of all signatures prior to processing payments.	<ol style="list-style-type: none"> <li>1. The International Request for Travel form (dated 5/24) has been submitted to the Foundation Office to ensure compliance.</li> <li>2. The Travel Office has updated its website to remove the outdated version of the International Request for Travel form, and the Complimentary Travel Form will be updated to include the required Foreign Influence Statute 1010.35 information to assure compliance.</li> </ol> <p><b>Responsible Party:</b> ORC and OIED</p> <p><b>Implementation Date:</b> July 2025</p> <p><b>Resources Required for Implementation:</b> New Process</p>



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Issue	DoA Recommendations	Corrective Action Plan
<b>Absence of data to support screening.</b> The ORC is unable to verify travelers' current research assignments, including associated funding sources and applicable regulations.	The Research Integrity Officer should work with the Director of OSP and the Director of OIRA to establish a data-sharing process that provides updated information on project assignments, personnel, and funding sources.	<b>COMPLETED</b> 1. The ORC is currently collaborating with OIRA and receives a monthly FAM Active Grant Report. This report includes key details such as the effective date, department ID and name, job code and description, position number, HR status, group status, FAM certification department, plan exit date, budget weeks, budget entity, project number, time report status, project ID, sponsor name, award start and end dates, principal investigator (PI) name, and project type.
		<b>Responsible Party:</b> ORC <b>Implementation Date:</b> April 2025 <b>Resources Required for Implementation:</b> New Process
<b>Travelers not required to register with International SOS.</b> The OIED has not enforced the requirement for travelers to register with International SOS <sup>2</sup> , limiting the University's ability to maintain a centralized data source for effective monitoring and reporting.	The AVP of OIED should require travelers to provide proof of registration with International SOS prior to approving travel.	1. The Office International Education and Development (OIED) will not sign the IRT and/or the Complimentary Travel forms until the traveler has registered with SOS. 2. An excel spreadsheet will be kept in the OIED office of all international travel.
		<b>Responsible Party:</b> OIED <b>Implementation Date:</b> July 2025 <b>Resources Required for Implementation:</b> New Process
<b>Unreported trip.</b> We identified one instance of a trip to a foreign country of concern (China) that was not included in the annual report required by Section 1010.36, F.S.	The Chief Compliance and Ethics Officer should ensure OCE uses its recently granted access to the International SOS dashboard to independently verify international travel data. OCE should also include any unreported travel in the next annual report. <sup>3</sup>	1. OCE has been receiving a weekly International SOS Tracker trip details report. This report provides the name, email address, departure city/country, date of departure, arrival date and destination information. 2. OCE collaborated with the FLBOG Inspector General's Office to include the previously unreported China trip details in the next annual report scheduled for September 2025.
		<b>Responsible Party:</b> OCE <b>Implementation Date:</b> 1. Completed 2. October 1, 2025 <b>Resources Required for Implementation:</b> New Process

<sup>2</sup> Per University Policy UP-04-06 International Travel Section II.6. International SOS Ltd. is the University's travel assistance provider.

<sup>3</sup> Per recent advice of OIGC to OCE.





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FLORIDA A&M UNIVERSITY  
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Issue	DoA Recommendations	Corrective Action Plan
<b>Foreign Gift Reporting</b>		
<b>Screening controls for foreign source contracts need to be improved.</b> The OCE relies on departments to self-report foreign source contracts included under the Section 1010.25, F.S., definition of reportable gifts. Departments may not have adequate time, expertise, access to research tools, training or support to correctly identify contractual parties serving as agents of a foreign source (including subsidiaries and affiliates).	The COO should consult with the President and Chief Compliance and Ethics Officer to determine who should be assigned responsibility for establishing a centralized process to screen contractual parties for potential foreign influence risks. This process should be housed within an existing contract review function and supported by a licensed screening service (e.g., Dow Jones add-on for Visual Compliance) to assess ownership, political exposure, and other high-risk associations.	<ol style="list-style-type: none"> <li>1. The Contract Management System Revenue Vision will be used to screen foreign source contracts.</li> <li>2. Any contracts originating from a foreign country/source will be routed to the Office of International Education and Development for review and compilation by Dr. William Hyndman.</li> </ol> <p><b>Responsible Party: Dr. William Hyndman</b></p> <p><b>Implementation Date: October 2025</b></p> <p><b>Resources Required for Implementation: New Process</b></p>
<b>Policies and procedures not fully developed.</b> The University has not developed its own foreign gift reporting policy to define roles and responsibilities. The OCE is in the process of developing internal operating procedures (IOPs) related to the foreign gift reporting process.	The Chief Compliance and Ethics Officer should collaborate with the Chief Policy Officer to develop a policy defining roles and responsibilities for foreign gift reporting. OCE should complete the documentation of internal procedures for foreign gift reporting.	<ol style="list-style-type: none"> <li>1. OCE will collaborate with the Chief Policy Officer to develop a policy that defines roles and responsibilities for foreign gift reporting.</li> <li>2. The internal procedures for foreign gift reporting are currently in draft form and approximately 90% complete.</li> </ol> <p><b>Responsible Party: OCE</b></p> <p><b>Implementation Date: 1. December 31, 2025, 2. July 31, 2025</b></p> <p><b>Resources Required for Implementation: New Process</b></p>





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The above plan was approved by:

*Donald Palm*

6/25/2025

Dr. Donald E. Palm III, Executive Vice President and Chief Operating Officer

Date

*Charles Weatherford*

6/25/2025

Dr. Charles A. Weatherford, Vice President, Research

Date

*Allyson Watson*

6/26/2025

Dr. Allyson Watson, Provost and Vice President, Academic Affairs

Date

*Rica Calhoun*

6/26/2025

Rica Calhoun, Chief Compliance and Ethics Officer

Date



## **DISTRIBUTION**

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### **Responsible Managers**

- Dr. Donald E. Palm III, Chief Operating Officer and Executive Vice President
- Dr. Charles A. Weatherford, Vice President, Research
- Dr. Tanise Jackson, Director, Research Compliance and Research Integrity Officer
- Dr. Allyson Watson, Provost and Vice President, Academic Affairs
- Dr. William T. Hyndman III, Assistant Vice President, OIED
- Rica Calhoun, Chief Compliance and Ethics Officer

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- Alonda Thomas, Vice President, Chief Marketing and Communications Officer

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- Julie Leftheris, Inspector General and Director of Compliance, Board of Governors



## PROJECT TEAM



*Project Lead*  
Nancy Shepherd, CPA,  
CIA, CRMA, CGFM  
Lead Senior Auditor



**Engagement was supervised by:**  
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CGAP  
Audit Director



*Project Reviewer*  
Chathya Chandler, MA,  
CIGA Audit Manager



**Engagement was approved and distributed by:**  
Joseph K. Maleszewski, MBA, CIA,  
CISA, CGAP, CIG, CIGA, CIGI,  
CCEP, CCA, CFE  
Vice President for Audit and Chief  
Audit Executive

## STATEMENT OF ACCORDANCE

The Division of Audit's mission is to provide independent, objective assurance and consulting services designed to add value and improve the University's operations. It helps the University accomplish its objectives by bringing a systematic, disciplined approach to evaluate and improve the effectiveness of risk management, control, and governance processes.

We conducted this assurance service in accordance with the International Standards for the Professional Practice of Internal Auditing. Those standards require we plan and perform the assurance services to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our engagement objectives. We believe the evidence obtained provides a reasonable basis for our conclusions based on our objectives.

Please address inquiries regarding this report to the Division of Audit at (850) 412-5479.

<https://www.famu.edu/administration/audit/index.php>