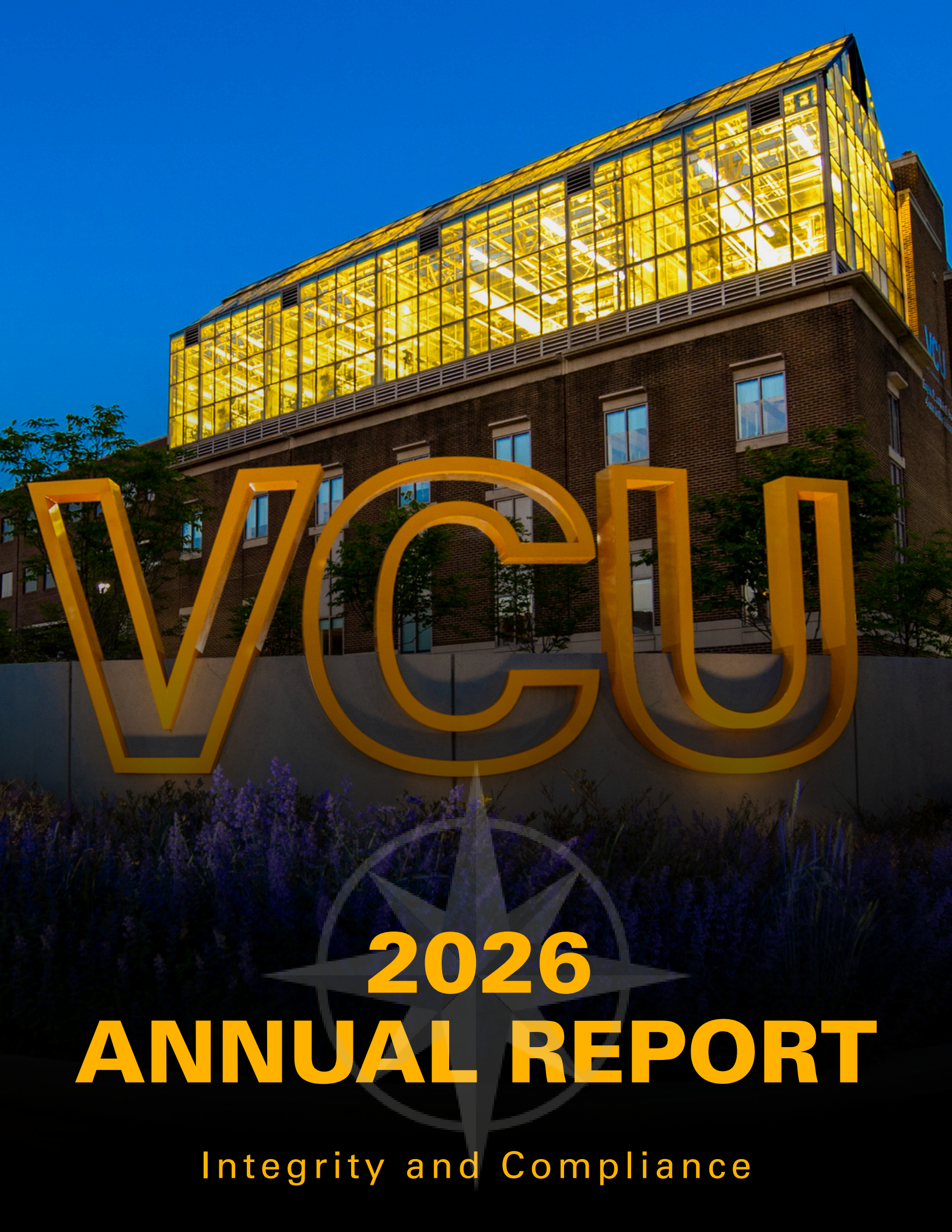




WCU

2026
ANNUAL REPORT

Integrity and Compliance



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Introduction



Fiscal Year 2026 Annual Report

Welcome to the fiscal year (FY) 2026 Annual Report of VCU's Integrity and Compliance Office (ICO), a unit of Audit and Compliance Services. The purpose of this report is to summarize for the Board of Visitors and our stakeholders our FY 2026 activity and impact as well as relevant trends and focus for FY 2027. The objective of our program is to foster an organizational culture that encourages ethical conduct and a commitment to compliance with the law. We accomplish this, together with our compliance partners across the university, by engaging leaders and employees to support a speak-up culture through communications, training and guidance, by building effective policies and processes, by assessing and mitigating risks and by executing best-in-class reporting and investigative processes. We seek to create an environment characterized by robust employee reporting, no fear of retaliation, reduced misconduct and a commitment to integrity in every interaction.

FY 2026 Program Review

FY 2026 represented a year of change and unprecedented growth for the ICO. We added two positions, one on the training and communications team focused on communications and another on the Clery team to help support Clery data gathering and our relationship with the Health Science Campus.

During the 2025 and 2026 fiscal years we identified an untapped opportunity to provide additional compliance training and communications resources for the VCU community. While we already had a strong T&C program, we did not have the capacity or expertise to meet the needs of our partners and to truly create an ICO brand on campus. In the latter part of FY 2026 into FY 2027, starting with the January 2027 annual training, we will work to provide additional content germane to the needs of the campus.

In addition, we are continuing the evolution of the ICO messaging to shift thinking about compliance as requirements forced upon us by outside entities to compliance and ethics being an integral part of VCU's culture. This was exemplified in the new Code of Conduct. The new Code focused on three key themes: ethical conduct at VCU, with VCU and beyond VCU. We have also begun the process of creating a uniform ICO brand and evaluating the structure of existing publications (some of which date back to the early 2010s) to better suit the needs of the campus community.



1 AT VCU
How we treat each other

2 WITH VCU
How we work with external partners

3 BEYOND VCU
How we engage with the larger community

As later pages in this report will note, FY 2026 brought about the deployment of two new software solutions to the campus. The ICO implemented a new case management system called Case IQ replacing our previous Convercent system. Case IQ has allowed us to mold the documenting of a case to our process as opposed to having to fit our process into a preestablished template. This has provided us greater flexibility and reliability in tracking case information. More importantly Case IQ has created an environment where our partners, particularly in Human Resources, are able to document their case investigation work. This was needed as Central HR diffuses more investigatory and documentary work to the unit based HR Professionals. Case IQ will also allow us to capture more and better data on our cases to help us both assess if our work is effective and to better capture case trends on campus. We plan to leverage the data and refine our use of data during FY 2027. We also implemented a new system for conflict of interest disclosures during FY 2026. The overall response to the new system was positive and we were able to achieve excellent response rates. We plan to take what we learned from this year's deployment and use the lessons during FY 2027.

Our policy and Clery programs both remain strong. The ICO provided both technical and process support to partners on significant policy initiatives including the revised Student Code of Conduct, the new Promotion and Tenure policy and the Post Tenure Review policy. In addition we are very encouraged that the new leadership in the Provost's Office is dedicated to updating many of that unit's very old policies. We have already seen some significant positive movement in revising those outdated policies. Our Clery program remains strong. We have started to work towards streamlining our Annual Security Report and should see results during FY 2027. We are also planning a Clery program audit for late FY 2027.

FY 2026 was a time of transition for the ICO and we are grateful for the support of the university community. We hope that the information provided in this report serves as a snapshot of the work we do and the role we play in helping to ensure that VCU is a great place to work, learn and succeed.



Culture and Investigations Analysis

The ICO continues to monitor university-wide concerns of potential policy violations or other misconduct, coordinating or conducting investigations into reports involving faculty and staff. In addition to reports that come directly to Audit and Compliance Services (ACS), the ICO tracks investigations and reports from compliance partners in offices across VCU, including Employee Relations, Equity and Access Services (EAS), the Office of the VP for Health Sciences, and the Office of the Provost. The ICO also assists these compliance partners during investigations or provides guidance on investigative processes. This collaboration allows our office to monitor and respond to misconduct trends across the university.

208

Total Volume Reported Concerns

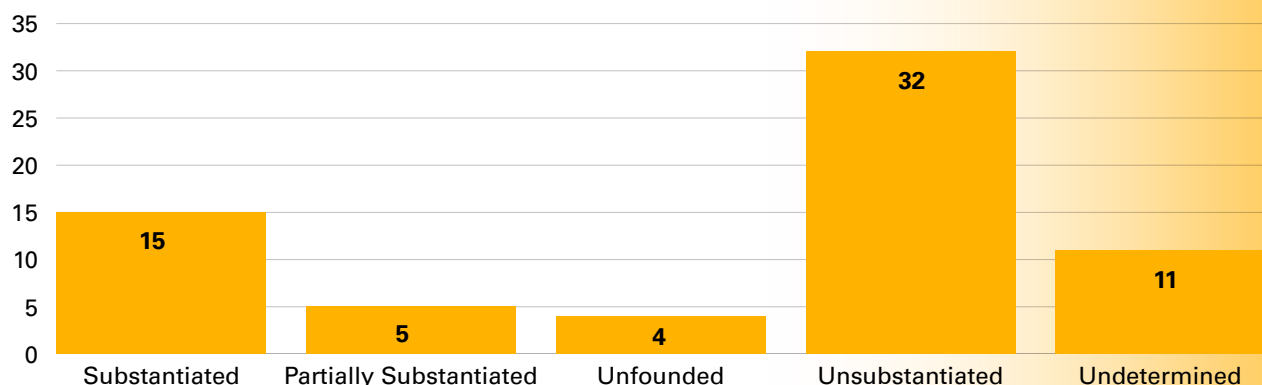
26%

Decrease from FY 2025



Reporting of misconduct decreased in FY 2026, with 208 total reports being received, a decrease about 26%. About 75% of those reports came directly to ICO, while about 25% came from partner compliance offices. This represents an increase in reports made directly to ICO from previous years, as well as an increase in reports made directly to the Helpline. In FY 2026, the ICO team emphasized constant communications with stakeholders and the efficient investigation and resolution of cases. The ICO continues to reduce risk for VCU by promoting the Helpline and our office as a trusted independent reporting option and ethical advisor.

Overall Substantiation Rate

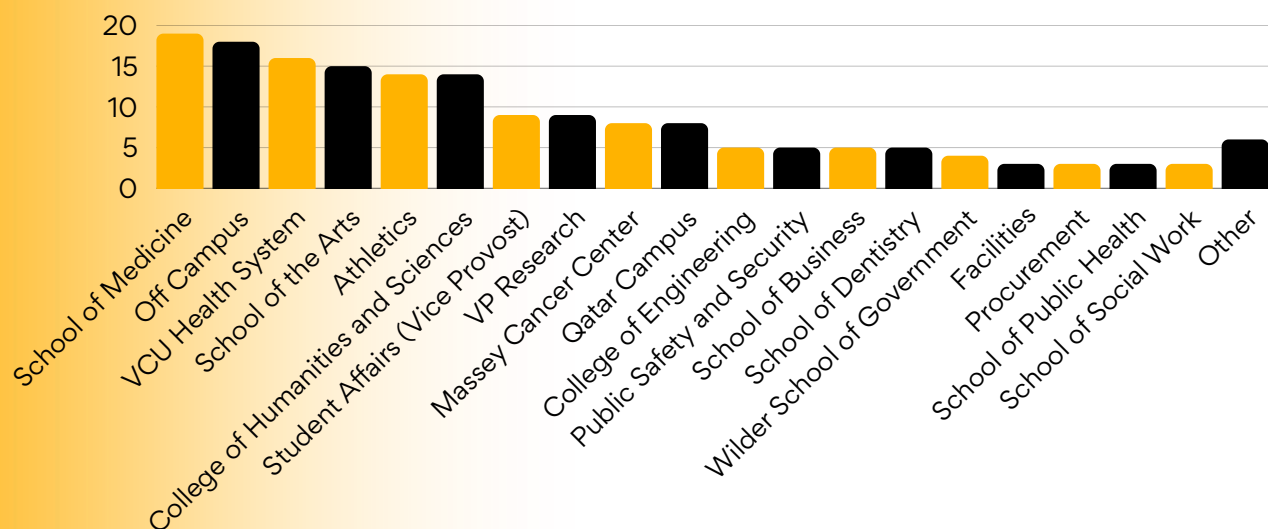


The overall full and partial substantiation rate for the total case volume was 30%, with 54% of closed cases resolved as unsubstantiated or unfounded, with 16% cases listed as substantiation undetermined due to insufficient information being available to conduct a thorough review of the report, or a lack of response from the reporting parties. The vast majority of reports received were not investigated because they fell outside the jurisdiction of the ICO and were mainly related to Title IX or Equal Opportunity complaints, student conduct or academic affairs, the VCU Health System, or other non-policy matters that were referred to offices across campus in a position to better resolve the reported issues.

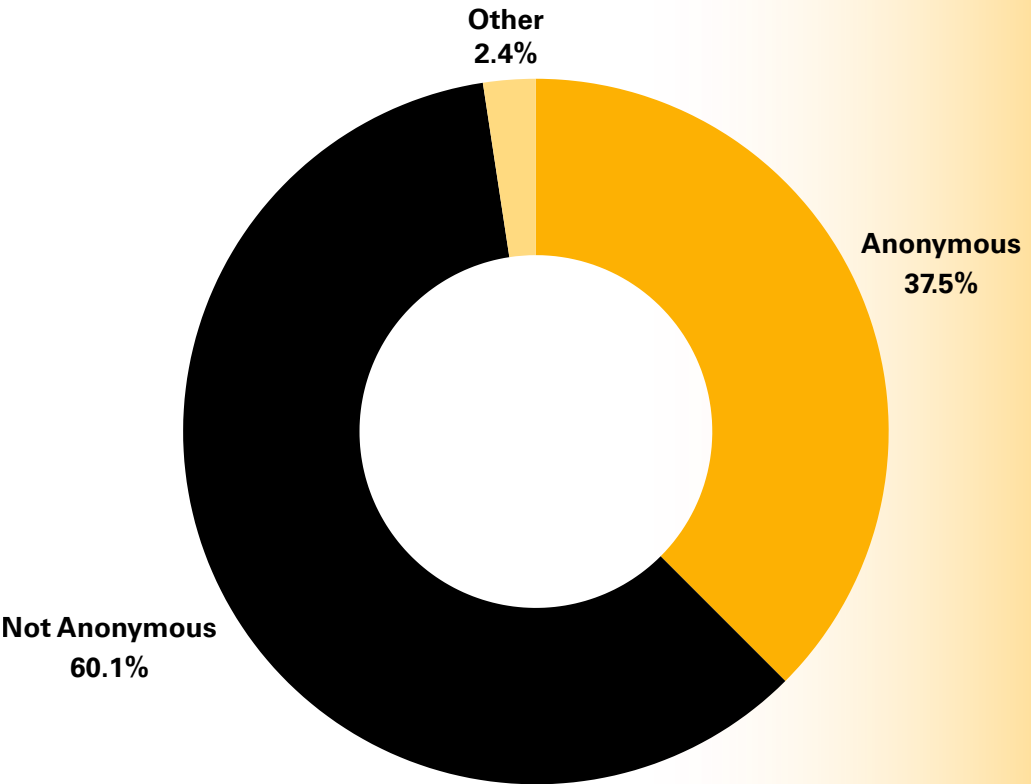
The highest number of reports for FY 2026 came from the School of Medicine. This is due to the size and complexity of the school and the relationship the ICO has built with the school's administration. We are in constant communication with senior leadership in the SOM. This has led to a very efficient reporting process for faculty and staff concerns. Off campus concerns and concerns originating from VCU Health were the second and third highest volumes of reports by location.

With the implementation of the new CaseIQ case management system we have also been able to get a clearer picture of who is reporting issues and what type of employee is most frequently having issues reported about them. Our data shows that non-management employees (faculty and staff) are the most frequent complainants followed by students reporting concerns. The most frequent respondents or subjects were managers (this includes mid-level managers and department chairs) followed by faculty. It should be noted that this data is from all cases reported to ICO, not necessarily cases investigated by ICO.

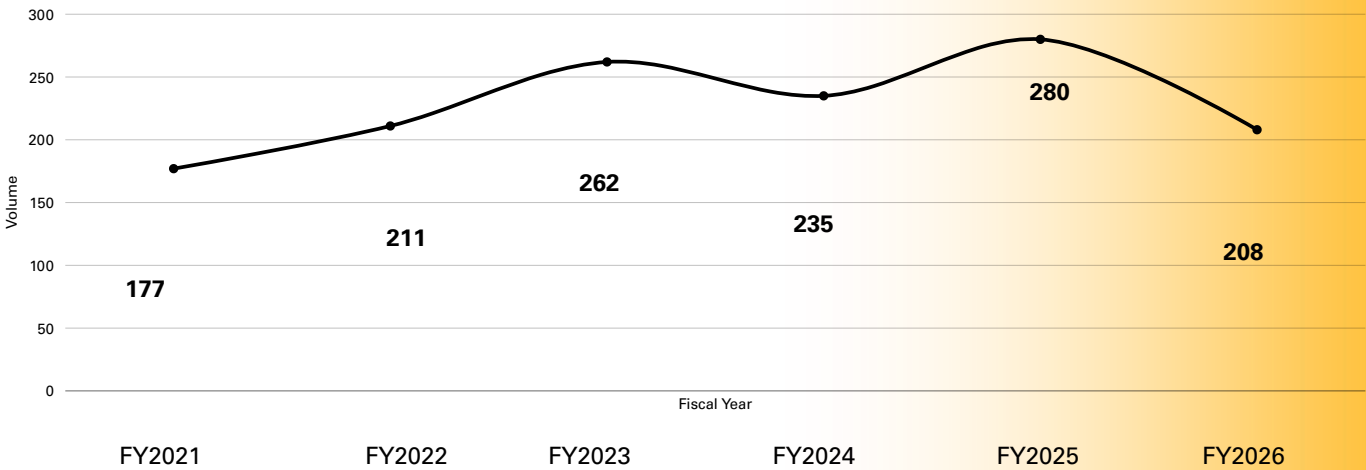
Reports by Campus Location



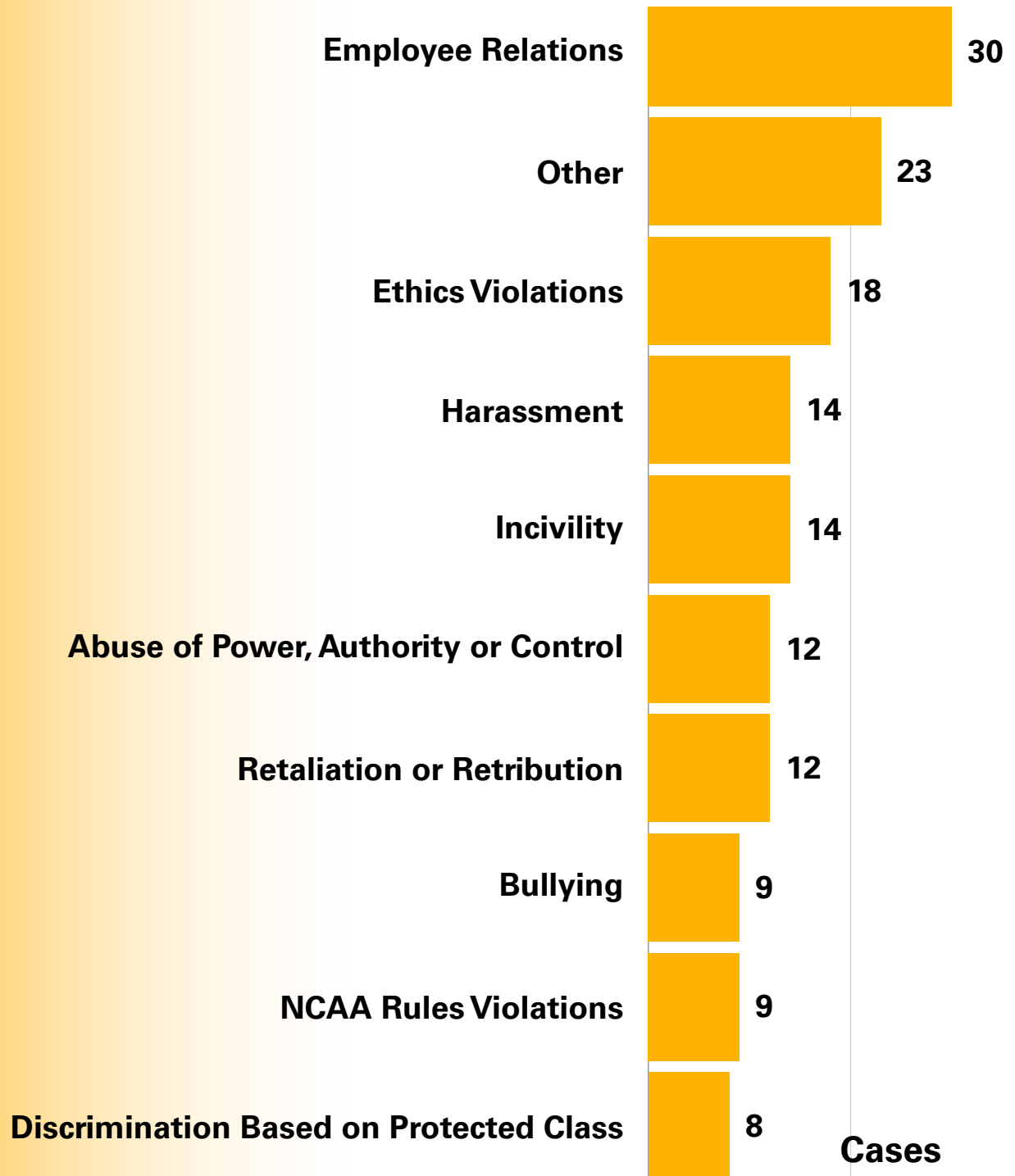
Anonymous Reporting Rate



Case Volume Over Time



Reported Issue Types



Data Benchmarking

					
	CASES PER 100 EMPLOYEES	ANONYMOUS REPORTING RATE	SUBSTANTIATION RATE	CONCERNS OF RETALIATION	MOST COMMON ISSUE TYPE
2025 NAVEX BENCHMARK	1.65	55%	44%	3.3%	HR, Diversity and Workplace Respect
2025 VCU INTERNAL BENCHMARK	2.41	21%	32%	3.8%	Discrimination Based on Protected Class
FISCAL YEAR 2026	1.69	38%	30%	5.8%	Employee Relations

VCU's case volume per 100 employees of 1.69, slightly exceeding the NAVEX benchmark in FY 2026 and below the FY 2025 internal benchmark showing marked improvement over FY 2025. Our anonymous reporting rate of 38%, while increasing from FY 2025, continues to remain well below the NAVEX benchmark. This confirms that our employees tend to trust our system, with approximately 60% of those reporting identifying themselves.

VCU's raw substantiation rate is significantly below the external benchmarks, reflecting a large portion of reports that were unable to be substantiated. The most common reason for a lack of substantiation was either a report not containing any allegations of policy violation, or a reporter not following up with the investigating office to participate in an investigation or to provide enough information to investigate.

When controlled for the reports that could not be investigated, the percentage of cases that were fully or partially substantiated falls to 30% versus 32% in FY 2025. The 30% is below the NAVEX benchmark but higher than our 3-year internal benchmark of 22%. VCU's rate of retaliation reporting rose this year to 5.8% from 3.8%, and remains above the NAVEX benchmark of 3.3%. In FY 2026, the ICO substantiated one case of retaliation. In that case, the university took proactive steps to remedy the situation with a positive outcome for the impacted employee. The ICO is engaged in multiple proactive strategies to encourage a speak-up culture and educate employees about retaliation. For example, the ICO continues to facilitate Psychological Safety workshops to leaders from a large range of units. We will continue to educate VCU employees, especially leaders, on preventing retaliation in the workplace. During FY 2026 it became evident that many members of the VCU community do not understand what truly is considered retaliation by policy. We hope to offer more training on the issue of retaliation to help clarify what retaliation really is in the employment context.

Policy Program Update

The Policy Program maintained its steady support for campus stakeholders, ensuring institutional policies were effectively developed, revised and monitored.

The ICO continues to guide policy refinement and institutional alignment across campus. Currently, university partners are conducting preliminary edits on several policies slated for triennial review, with the ICO providing ongoing consultation to ensure consistency. While recent federal regulatory changes have extended some timelines as policy owners await updated guidance, the Policy Program continues to actively monitor the review process and assist units in keeping their policies current.

At present, 85% of VCU policies are up to date. Of the remaining 15% that have lapsed, all are under active review by their respective offices. This year several new policies were approved including; Clery Act Policy, Acceptable Use of AI, Promotion and Tenure and Term Faculty Promotion. Substantive revisions were completed to the Delegation of Signatory Authority Policy, Post-Tenure

Review, Campus Expression and Space Utilization, Working @ VCU: Great Place and the Student Code of Conduct.

Of note this year was the progress made by Faculty Affairs and their updates to expired policies, many of which were over a decade past their expiration date. These policies include: Professional (Term) Faculty Promotion, Academic Rights and Responsibilities, Promotion and Tenure, Study Research Leave and Post Tenure Review. The ICO appreciates the strong momentum and partnership Faculty Affairs has shown in actively revising and updating their respective policies.

The ICO Communications Team combined the ICO newsletter and policy announcements, boosting readership by 5.65% and improving policy engagement.

Looking ahead, the Policy Program continues its partnership with policy owners to preserve the consistency, efficiency and integrity of the VCU policy library. Key initiatives for the upcoming year include a comprehensive review of the Policy on Hazing, the formal retirement of several legacy HR policies and an ongoing collaboration with Faculty Affairs to address their remaining nine expired policies.

Current number of up-to-date policies have increased by 10% in the last year.

Conflict of Interest and Commitment

This year the ICO successfully launched its new software platform, Lextegrity (by Case IQ), to host Conflict of Interest Disclosures. This transition replaced the legacy system, Convercent, with a more intuitive, user-focused interface designed to streamline the annual and ad hoc disclosure processes.

Completion Rates

Dec. 8, 2025 - March 31, 2026

2,097

Questionnaires completed out of 2,308 questionnaires sent

91%

Completion rate (2.39% increase from FY 2025)

To support this launch, the ICO conducted comprehensive campus-wide communications targeting administrative units, faculty chairs and supervisors across the university. However, the initial deployment was not without its challenges; the ICO encountered significant technical issues during the system launch.

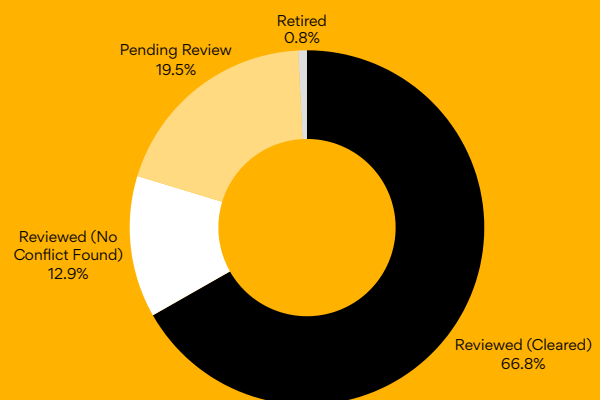
In response, the COI Program Manager

took a highly proactive approach to resolution, immediately engineering technical workarounds and providing dedicated, hands-on troubleshooting support to both COI Administrators and end-users across the campus. Ultimately, despite a steep system learning curve and these unexpected technical hurdles, the intensive support strategy proved highly effective, allowing the university to conclude the campaign with a higher completion rate than the previous year.

The transition to the Lextegrity platform yielded a significant increase in compliance, with the annual completion rate rising to 91% (up from 88.61% the previous year).

Disclosure Breakdown

Total disclosures: 969



The campaign generated a total of 969 submitted disclosures. A primary objective of the software transition was addressing previous review backlogs by optimizing workflows. With the new system in place, the ICO team successfully processed and resolved the vast majority of submissions, with 82.6% of disclosures fully reviewed and cleared or resolved. This is a significant improvement from last year where only 54% of disclosures were reviewed post submission.

The COI&C program continues to demonstrate its vital operational utility. Over the past year, the updated disclosure database has actively supported internal investigations led by the ICO Program Manager for Investigations, significantly streamlining fact-finding efforts, accelerating resolution timelines and enhancing overall institutional oversight.

Key Trend Note:

60%

of disclosure submissions fell under the “employee, director, owner, consultant, partner or similar position of an outside entity” category, accounting for 578 out of 969 of the total submissions.



Looking ahead to next year, the ICO’s primary focus will be on optimizing system configurations to resolve the technical friction points identified during the initial Lextegrity launch.

A key challenge will involve refining automated system logic—such as managing data restrictions that lock out unsubmitted drafts once a campaign officially closes—to prevent automated notification errors and reduce administrative help-ticket volumes.

Additionally, the ICO will prioritize deepening system fluency among university reviewers and MBU administrators to accelerate disclosure clearance rates and further minimize the volume of pending disclosures remaining at the close of the campaign.

Clery Act Compliance

Program Overview

Building on the comprehensive program redesign completed last year, VCU expanded its efforts across both the Monroe Park and MCV campuses, improving how crime and safety report information is collected, reviewed and shared with the community.

Completing the work done during the reengineering process, the Clery team focused on making reporting processes clearer, more consistent and easier for campus partners to navigate.

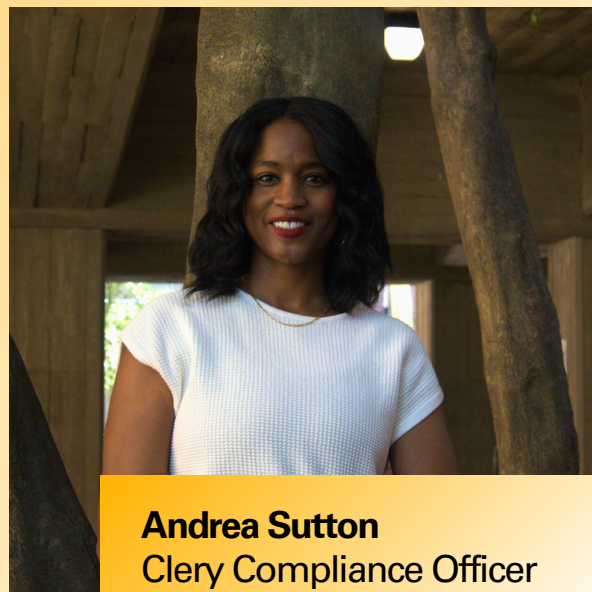
A new Clery Compliance Coordinator, Andrea Sutton, joined the Integrity and Compliance Office to lead the development of a dedicated Clery program for the MCV campus and VCU Health System. This expansion ensures that all areas of the university benefit from the same strong standards, collaborative practices and a data-driven approach.

A major milestone this year was the creation of the Clery Data Integrity Team, a cross-unit group responsible for ensuring that every report included in VCU's annual crime statistics is accurate, properly classified and fully

documented. This work supports a transparent audit trail and reinforces VCU's commitment to reliable public disclosures.

The university also strengthened its partnerships with VCU Police, Title IX, Human Resources, Student Conduct, Residential Life and Housing and VCUarts. Together, these units helped refine reporting workflows, improve communication and ensure that safety-related information is shared quickly and consistently.

One example is the updated Timely Warning policy, which now uses clearer, more concise language and a streamlined internal process within VCU Police to support faster notifications to the campus community.



Andrea Sutton
Clery Compliance Officer

VCU continued improving the Annual Security and Fire Safety Report by updating its layout and design to make the document easier to read and navigate. Work also progressed on the ongoing review of Clery geography, including a new process that ensures the Clery team is notified of all real estate transactions. This helps maintain accurate maps of university-owned or controlled spaces.

Together, these efforts reflect VCU's commitment to maintaining a strong, transparent and collaborative Clery program. By investing in clear processes, reliable data and cross-campus partnerships, the university continues to enhance the safety and well-being of the VCU community.



Clery Act Compliance



Geography and Reporting

As VCU continues strengthening its Clery Compliance Program, a major priority this year has been expanding and refining the university's Clery geography across all campuses, including the MCV campus, the VCU Health System and VCUarts Qatar. Each of these environments presents unique operational structures, reporting pathways and legal considerations, making geography review an essential part of the Clery program.

The MCV campus is one of the most complex areas of Clery geography at VCU, blending academic programs, clinical training sites, research facilities and patient-care environments. To support accurate reporting, the Clery team has launched a comprehensive geography review that includes all MCV schools, clinical locations and VCU Health System facilities.

This work begins with building strong relationships with key partners; school leadership, clinical administrators, the real estate team and staff responsible for reviewing agreements for use of space and programs. These partnerships ensure the Clery team is notified early about new locations, leased spaces, clinical partnerships and program sites, allowing geography determinations to be made proactively.

A new report-mapping process is underway to examine how safety-related information moves across the MCV campus and VCU Health. This includes reviewing how incidents are reported, how information is processed internally and what information is shared with other VCU offices such as VCU Police, Title IX, Human Resources and Student Conduct. By understanding each step of the reporting pathway, the Clery team is identifying opportunities to streamline communication, reduce duplication and ensure all information is reviewed through a Clery lens before reaching the final reconciliation and disclosure stages.

The Clery team is also learning how VCU Health's internal reporting systems operate, how they intersect with university processes and where they remain separate. This understanding allows VCU to design a process that supports accurate reporting and thorough review while respecting the operational autonomy of VCU Health. The final outcome will be a unified, reliable and transparent process ensuring that Clery geography is consistently evaluated, incident information flows smoothly between units and VCU Health maintains the independence needed to operate within its clinical mission.

In addition to domestic geography work, VCU has expanded its review to include VCUarts Qatar, the university's international campus located in Doha. Because VCUarts Qatar operates within a different national legal system, reviewing Clery geography in this environment requires careful coordination and a clear understanding of how U.S. federal requirements intersect with local laws and regulatory frameworks.



Unlike the MCV and Monroe Park campuses, VCUarts Qatar is governed by Qatari law, which defines safety reporting, privacy protections and institutional responsibilities differently than U.S. statutes. The Clery Act remains a U.S. federal requirement for VCU, but its implementation abroad must respect local legal boundaries, cultural considerations and government regulations.

To support this work, the Clery team is collaborating closely with VCUarts Qatar leadership to:

- Identify all university-owned or controlled spaces abroad
- Review agreements for use of space and academic programs
- Understand local reporting expectations and legal limitations
- Determine how safety-related information can be shared with VCU while complying with Qatari law

Together, the expanded geography review across MCV, VCU Health and VCUarts Qatar reflects VCU's commitment to maintaining a strong, transparent and globally informed Clery program. By building partnerships, understanding diverse reporting systems and aligning processes where possible, VCU ensures that safety information is accurate, responsibly shared and reviewed through a consistent Clery lens.



Clery Act Compliance

Data Integrity Team



VCU strengthened its Clery Compliance Program this year with the creation of the Clery Data Integrity Team, a cross-collaborative group designed to ensure that all safety-related information is reviewed consistently, accurately, and with a clear Clery lens. This team brings together representatives from VCU Police, Title IX, Residential Life and Housing, the Dean of Students Office, and Student Conduct & Academic Integrity, creating a shared structure that supports reliable reporting across the university.

The Data Integrity Team plays a central role in reviewing all reports submitted to their respective areas, ensuring that each incident is evaluated using Clery definitions and classification standards. Each department maintains its own audit trail, documenting how reports were reviewed, how Clery classifications were determined, and how cases move through the reconciliation process.

Team members participate in monthly reconciliation meetings, where current-year cases are discussed collaboratively to prevent duplication, confirm geography, and ensure accurate classification. They also take part in reconciliation meetings focused on prior-year reports, helping prepare for the annual publication of VCU's crime statistics. This ongoing review ensures that every statistic included in the Annual Security and Fire Safety Report is supported by clear, consistent, and well-documented information.

To support this work, the Data Integrity Team completed several internal trainings led by the Clery Administrator. These sessions covered report review techniques, maintaining audit trails, identifying and resolving duplicate reports submitted to multiple offices, and understanding updates to Clery requirements, including the addition of hazing as a reportable crime.

Beyond its operational responsibilities, the Data Integrity Team provides an important layer of continuity and stability for the Clery program. By distributing knowledge and responsibilities across multiple units, VCU reduces reliance on any single individual and ensures that Clery processes remain strong during periods of personnel change. This shared model protects the integrity of the university's reporting systems and reinforces VCU's long-term commitment to accuracy, collaboration, and compliance.

Training and Communications

Annual Ethics and Compliance Training

This year's Spring Annual Required Training focused on the integration and release of VCU's new Code of Conduct as the central learning experience for employees across the university.

The training helped employees understand how the Code of Conduct connects to everyday workplace decisions, university policy and VCU's broader Culture of Care. Content created emphasized that ethical conduct is not limited to moments of formal reporting or policy review; it is reflected in daily interactions, responsible use of university resources, respectful communication, transparency and the willingness to ask questions when expectations are unclear. This framing supported a more approachable and practical understanding of compliance, helping employees see the Code as a helpful guide for navigating situations across campus.



The training reinforced that these expectations apply across the university and that everyone has a role in maintaining public trust, protecting the campus community and supporting an environment where concerns can be raised appropriately and addressed responsibly.

The release of the new Code of Conduct also provided an opportunity to align required training with VCU's values and institutional priorities. The training connected compliance responsibilities to the lived experience of working at a large public research university, where employees make decisions that affect students, colleagues, patients, partners and the broader community. By grounding the training in practical examples and accessible language, the annual requirement supported both awareness and application, helping employees understand why the Code matters.

In addition to the Code of Conduct work, VCU advanced its nondiscrimination compliance efforts through the development and delivery of a training focused on the 3P's Framework for Risk Assessment: *Protected Characteristics, Process and Perception*. The training gave employees and leaders a practical way to evaluate programs, offerings, communications and decision-making processes through both a legal and institutional lens. Rather than presenting compliance as a static checklist, the framework encouraged participants to consider whether programs are genuinely open to all, whether decision-making processes are fair and defensible, and how programs may be perceived by participants, observers and external stakeholders.

Together, the Code of Conduct and 3Ps training efforts strengthened the shared understanding of how compliance, institutional values and public trust intersect. The annual training established a stronger foundation for consistent expectations, encouraged employees to seek guidance early and reinforced that compliance is a shared responsibility across VCU. By equipping employees with practical frameworks and accessible guidance, the university supported more consistent decision-making, proactive risk assessment and a culture of integrity and care across the university.

Training and Communications



Ongoing Training & Communications Efforts

During the reporting period, the Integrity and Compliance Office continued to strengthen its training and communications infrastructure in support of a more informed, accountable and values-driven university community. This work reflected a broader effort to modernize how compliance information is shared across VCU, with an integrated approach that combines annual training, onboarding, targeted education, practical resources, a quarterly newsletter and ongoing communications. Together, these efforts helped reinforce the role of compliance as a shared responsibility and a daily practice connected to integrity and VCU's Culture of Care

ICO completed and released seven total trainings during the reporting period, including the continued development and implementation of New Employee Orientation as a foundational learning experience. The updated orientation structure introduces new employees to the role of ICO, VCU's Culture of Care, university policy, FERPA, speaking up, Clery essentials, role-based responsibilities and where to go for guidance. By embedding these topics early in the employee lifecycle, ICO helped establish a consistent baseline of awareness and expectations for employees as they begin their work at VCU. This approach supports both compliance knowledge and also confidence in knowing when to ask questions, utilizing resources correctly and how individual responsibilities connect to the university's broader mission.

Training development also focused on improving engagement, accessibility and practical application. Combining training and communication efforts, ICO integrated seven total videos to help make key compliance topics more approachable, consistent and visually engaging for learners. These videos supported a more modern learning experience by reinforcing core concepts in a format that is easier to digest, share and connect to real workplace situations. In addition, ICO created multiple job aids to extend learning beyond the training environment. These resources help employees apply expectations in practice, clarify common questions and support more consistent decision-making across roles and departments.

ICO published nine total blogs and successfully revitalized the former “Compliance Corner” as a regular communication channel. Blog content supported greater awareness around integrity, policy expectations, reporting, and practical compliance guidance. By translating complex or formal topics into accessible communications, ICO helped employees better understand why these expectations matter in the daily work of the university.

ICO also advanced a more unified and visible communications strategy by combining Policy Quarterly with its newsletter. This expanded the reach of compliance and policy communications approximately tenfold, creating a stronger platform for sharing updates, reinforcing expectations and connecting employees to relevant resources. The combined newsletter model also improved efficiency by bringing policy updates, compliance education, training reminders and practical guidance into one coordinated communication vehicle. This helped reduce fragmentation and strengthened the connection between policy awareness and employee-facing compliance education.

This year also included personnel expansion that strengthened ICO’s capacity for training, communications and program coordination. The addition of a new communications coordinator bolstered ICO’s efforts in content planning, message development, newsletter production, blog publication and the continued growth of employee-facing communications.

ICO also added a new program manager role to support the planning, development and implementation of training and communications initiatives. Together, these staffing changes increased the office's ability to manage the office's growing portfolio.

ICO is building on this momentum by expanding the Annual Security Report and Annual Report across print and web formats. This improves accessibility, transparency, and navigation for all audiences.

Summer training priorities include Signatory Authority, expanded Psychological Safety workshops, and digital resources—building a flexible, layered model for long-term compliance awareness.

Overall, ICO's training and communications work advanced a more connected, practical and modern approach to compliance education at VCU.

99.1%
of employees
completed E & C
annual trainings

7,445%
increase in
Newsletter
readership

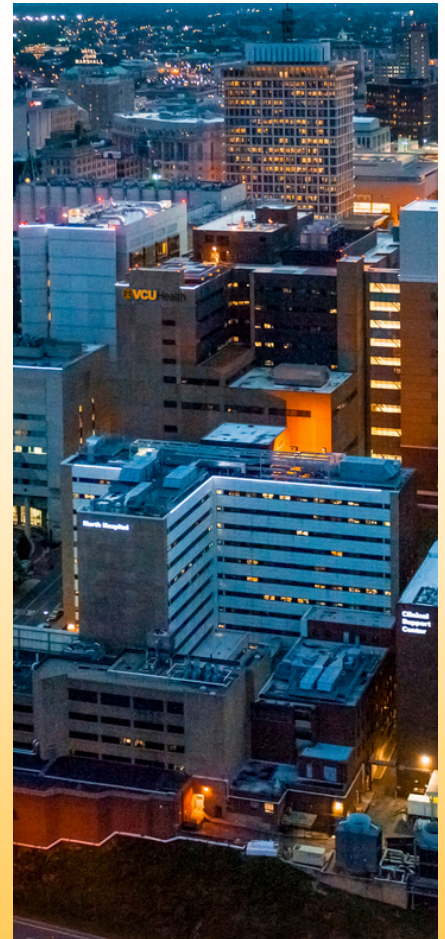
7.06%
increase in
newsletter click
through rate

3
editions of the
eNewsletter,
including policy
Quarterly, since
January 2026

Risk Assessment & Monitoring

Conflict of Interest Reporting and Accountability for Closure

This year the ICO encountered several novel issues in the COI space at VCU. We worked on a case involving a relationship between two VCU employees in a supervisory relationship. In addition we encountered several instances where conflicts existed between VCU employees and their duties to the university and with international institutions and businesses. We believe that there are still conflicts that go unreported and should be identified. As we have noted in the past, conflicts are not inherently negative, but they need to be disclosed. The ICO helps mitigate the risk by conducting a yearly campaign asking those in positions of trust, including faculty, to disclose conflicts to the university. We need to continue to develop the awareness and communication around this campaign. Most importantly we need to continue to communicate to managers at all levels the importance of COI disclosure and hold them accountable for reviewing and/or flagging potentially problematic activities or relationships.



Culture of Integrity

A common theme from the ICO and in the Ethics and Compliance context is that both ethical behavior and an environment where compliance is routine are organizational culture issues. To ensure a culture of compliance, it is important for leaders at all levels to be held accountable for their behavior, particularly behavior that places the institution at risk. Ignoring this obligation creates a significant risk to the institution.

Lack of Process and Monitoring Rigor

During the course of the year the ICO and other offices within the university have identified several risks associated with inconsistent processes and the monitoring of those processes. In an institution as large and decentralized as VCU, communicating and implementing consistent processes, and monitoring to ensure that those processes are being followed, is key to mitigating risk. We will continue to emphasize developing improved organizational skills in this area in our recommendations after investigations and in our work with our partners in internal audit in their reviews.



Conclusion

In FY 2026, VCU's Integrity and Compliance Office navigated a year of structural growth, operational modernization, and campus-wide engagement aimed at embedding ethics into the university's culture. Through team growth, the implementation of new technology platforms like Lextegrity, expansion of communication reach, and the rollout of an updated Code of Conduct, the ICO significantly enhanced institutional awareness—achieving a 91% completion rate on conflict disclosures and successfully verifying that 85% of university policies are up-to-date. Simultaneously, our team celebrated the continuation of the Clery Compliance Program into the MCV Campus and VCUarts Qatar, and introduced revitalized trainings serving the campus community and new employees. Moving into FY 2027, the ICO will build on this momentum by refining its data tracking, amplifying communications, clearing out remaining policy backlogs, and working alongside university leadership to support a transparent culture.



91%

of COI disclosures
completed



10,125

New Newsletter
Readers



37.5%

Anonymous Reporting
Rate

