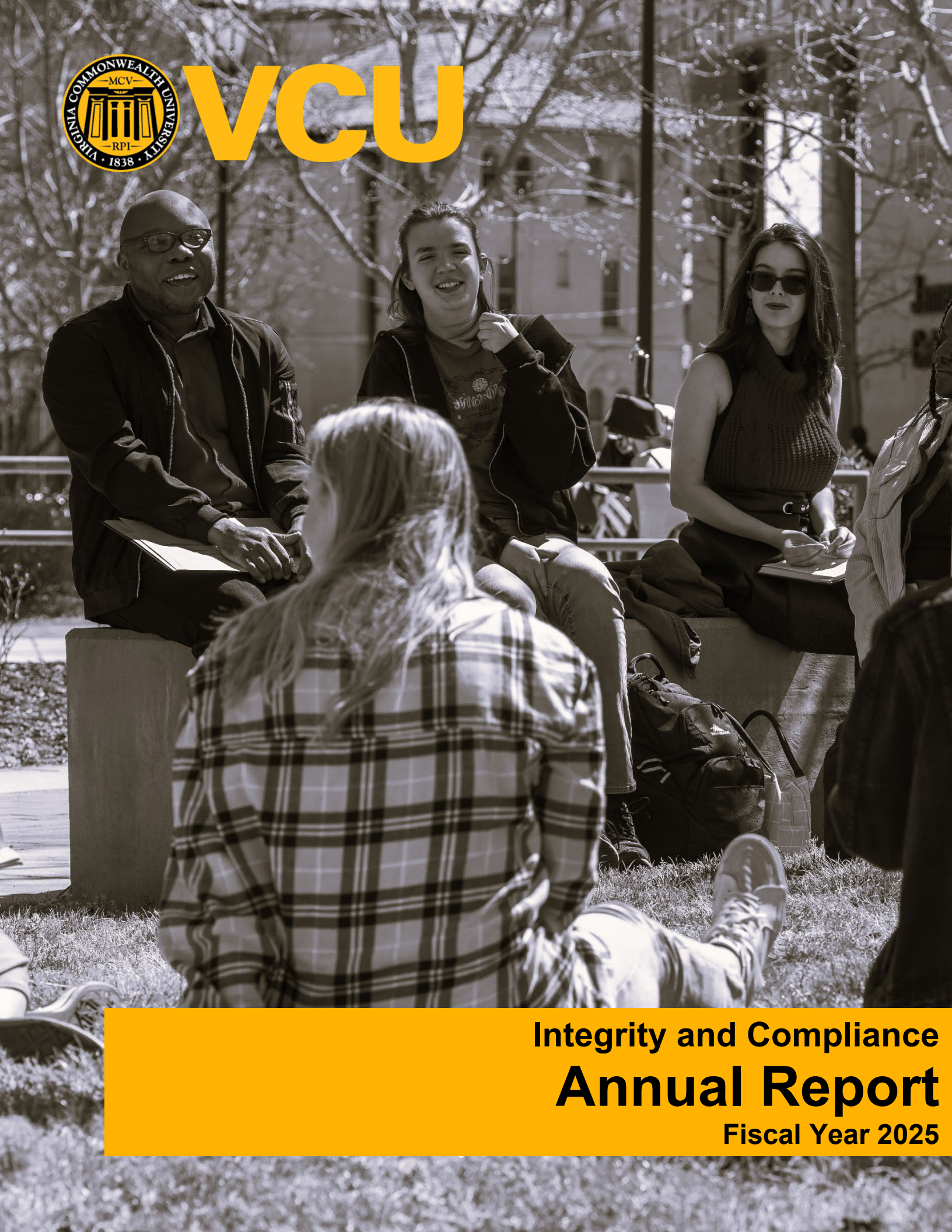

VCU

Integrity and Compliance
Annual Report
Fiscal Year 2025

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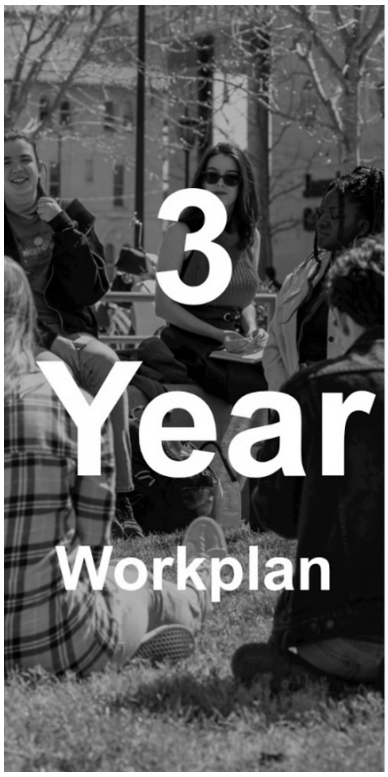
Introduction

Welcome to the fiscal year (FY) 2025 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 2025 activity and impact as well as relevant trends and focus for FY 2026. 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 transaction.

Program Structure and Resources

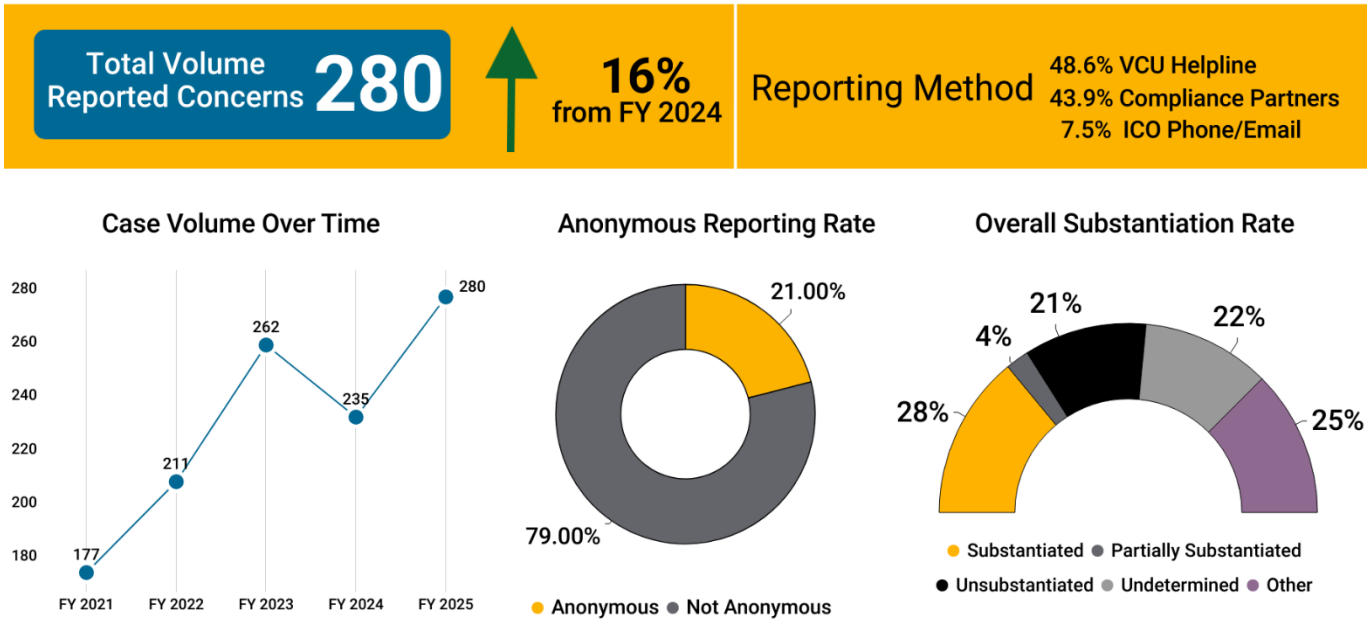


In FY 2025, the ICO focused on completing initiatives from FY 2024, improving programmatic infrastructure, and responding to an increase in the number of concerns reported to the office. During FY 2025 a significant amount of time was spent working with partners to implement new processes and procedures around compliance with the Clery Act. This involved working with partners to develop process maps for how Clery issues are reported, managed, and shared. In addition, we implemented a report reconciliation process to bring partners together to ensure that reports are not duplicated in the counting of Clery incidents. This process ensures that we provide an accurate and complete count to the Department of Education. We expect the remaining near-term Clery remediation work, including the development of a comprehensive Clery Act policy, to conclude in the first half of FY 2026. After that, we will focus on maintaining and continuously improving our program.

The ICO has also been in the process of implementing a new helpline/case management solution with an expected go-live date of late September 2025. This new solution will allow for greater cooperation and information sharing between units and more sophisticated analytics to help us be more proactive in addressing concerns. The change in solutions in a direct result of feedback from partners and our realization that we needed better core infrastructure around case management and analytics.

Finally, as the following pages will show, the ICO spent much of FY 2025 working through an uptick in reported cases. We believe that this increase shows that our Integrity and Compliance program is healthy and that people across campus are heeding our charge to “speak-up.” While the number of cases reported has increased, substantiation rates remained proportional, meaning even though we’re getting more reports, these reports have not resulted, to date, in more findings of wrongdoing.

Culture and Data Analysis



The ICO continues to monitor university wide reported concerns and responses to misconduct through Convercent, an online data management system. Convercent also contains the VCUHelpline, a third-party reporting tool with an anonymous reporting option. 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. This collaboration allows our office to monitor and respond to misconduct trends across the university.

Reporting of misconduct increased in FY 2025, with 280 total reports. About 44% of those reports came to partnering offices, and about 49% came directly to ACS as an independent reporting option. This represents an increase in reports made directly to ACS from previous years, as well as an increase in reports made directly to the Helpline. In FY 2025, 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 establishing the Helpline and our office as a trusted independent reporting option and ethical advisor.

This year the ICO played a central role in helping offices across the enterprise work through concerns about conflicts and commitments. While we don't have specific numbers, anecdotally, we fielded more inquiries about whether or not an activity constitutes a conflict than ever before.

The overall full and partial substantiation rate for the total case volume was 28%, with 47% of closed cases resolving as "Substantiation Undetermined," or "Other." The vast majority of the cases in these categories were not investigated due to lack of response from the reporter or procedural blockers in offices with reporter-driven processes, such as Equity and Access Services.

Data Benchmarking

VCU's case volume per 100 employees of 2.41 exceeded the external benchmark in FY 2025 and was above our internal benchmark. This is due to the uptick in cases which we believe is directly related to our "speak up" initiative. Our anonymous reporting rate (the rate of those reporting without giving their name) continues to remain well below the NAVEX benchmark and matching the 21% rate from two years ago. This confirms that our employees tend to trust our system with almost 80% 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 these reports that could not be investigated, the percentage of cases that were fully or partially substantiated falls to 32% versus 52% last year. The 32% is below the NAVEX benchmark but higher than our 3-year internal benchmark. VCU's rate of retaliation reporting rose this year to 3.8% from 3.4% but is still down considerably from the 7% in FY 2023. This is still higher than the external benchmark. No retaliation reports were substantiated in FY 2025 but two cases remain open. The ICO is

	Cases per 100 Employees	Anonymous Reporting Rate	Substantiation Rate	Concerns of Retaliation	Most Common Issue Type
NAVEX Benchmark	1.57	52%	46%	3%	HR, Diversity, and Workplace Respect
VCU Internal Benchmark	2.15	19%	23%	3.4%	Discrimination Based on Protected Class
Current Fiscal Year	2.41	21%	32%	3.8%	Discrimination Based on Protected Class

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.

Policy Program Update

The Policy Program continued to provide robust support to policy owners across campus in the development, revision, and maintenance of institutional policies.

This year, several new policies were drafted and entered various stages of approval, including:

- Non–Research Related Centers and Institutes
- Concealment of Identity
- Organizational Use of AI

Significant revisions are in process for existing policies, including:

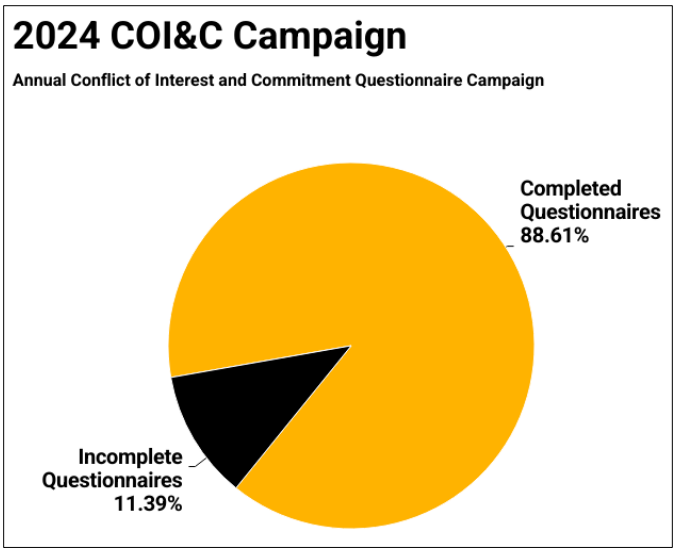
- Undergraduate Scholarship Management
- Campus Expression and Space Utilization
- Student Code of Conduct

The ICO remains actively engaged in supporting policy refinement and institutional alignment efforts. Several policies are currently undergoing preliminary edits by university partners ahead of full triennial review. Throughout this process, the ICO provides consultation and feedback to ensure consistency and responsiveness to evolving institutional needs.

At present, 75% of VCU policies are up to date. Of the remaining 25% that have lapsed, 45% are under active review by their respective offices. Notably, 35% of expired policies belong to the Faculty Affairs Office within the Provost's Unit. The ICO is collaborating closely with the Faculty Affairs, and it is anticipated that they will make progress this year in updating their policies meet current VCU standards.

In May, the ICO welcomed Sarah LaMorey as Program Manager for Policy, Compliance, and Conflicts. Sarah brings a diverse background in public service and higher education, having previously served with U.S. Citizenship and Immigration Services and as manager of the graduate program in Conflict Resolution and Coexistence at Brandeis University. Since joining the team, Sarah has quickly taken on the policy portfolio, advancing the triennial review cycle and building collaborative relationships with ICO partners across the university.

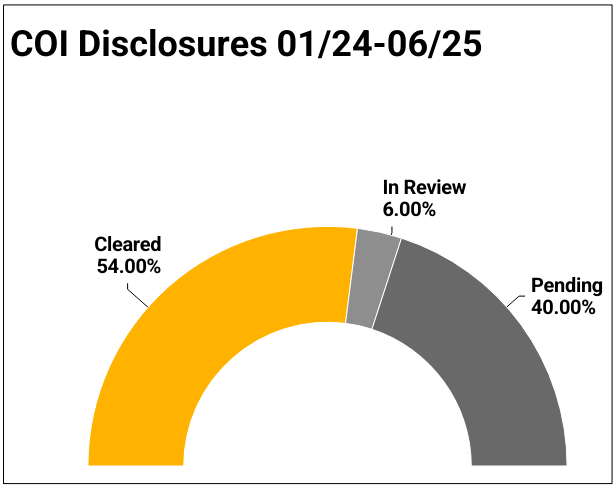
Conflicts of Interest & Commitment



Building on the 2024 implementation of the University-wide Conflicts of Interest and Commitment (COI&C) program, the ICO has continued to advance disclosure processes and infrastructure. A key milestone in 2025 was initiating a transition to a new software platform to host COI disclosures. In July, we began working with Case IQ/Lextegrity to replace the existing system (Convercent) with a more intuitive, user-focused interface.

While campus-wide training and familiarization will be required, we are confident this enhanced system will streamline the annual and ad hoc disclosure processes and strengthen the ICO's management of COI&C activities. Training for administrative units will begin in the fall, with full implementation planned to support the annual COI disclosure campaign in December.

With the launch of the new COI&C system, including comprehensive training and campus-wide communications, we anticipate increased completion rates for the annual questionnaire and related disclosures. As of July 29, 2025, 88.61% of questionnaires (1,883) have been completed, resulting in 409 disclosures. There were 206 ad-hoc disclosures submitted, resulting in a total of 615 disclosures. 54% of these disclosures have been cleared, while 46% are still in review/ pending. The delay in the review of disclosures is a key aspect that the ICO team is addressing with the implementation of the new COI disclosure software. As part of this transition, we are examining how to improve the review process and streamline it for more efficient processing.



The COI&C program continues to demonstrate its operational utility. Over the past year, the disclosure system supported several investigations led by the ICO Program Manager for Investigations, streamlining fact-finding efforts and enhancing institutional oversight.

Regulatory Reporting Monitoring

This year marked the initiation of the triennial review of the Accountability Matrix, a central resource that consolidates state and federal regulations relevant to VCU's operations and activities**.** The review is underway in collaboration with departments and offices across the University responsible for regulatory compliance. The goal is to verify the accuracy of the matrix data and ensure that applicable regulations are being appropriately followed and reported.

In parallel, we have begun development of a redesigned matrix interface. In partnership with VCU Web Services, we are creating a more accessible and user-friendly format to enhance usability for University stakeholders and public users who rely on the matrix as a regulatory reference.

Investigations and Accountability

The ICO conducted approximately 29 independent reviews or investigations in FY 2025 and participated in approximately 4 collaborative investigations with partner offices. Metrics reflecting investigative cycle time improved in FY 2025, with an average case closure time of 34 days versus 50 last year, and 48 cases open at the end of the fiscal year versus 27 last year. The increase in open cases at the end of the FY resulted in part from an increase of reports being received and turnover in some of our partner compliance offices.

The ICO continues to support efforts to standardize and improve investigative practices throughout the university by providing investigative consultation, assistance, and one-on-one training VCU employees who engage or assist in workplace investigations.

In FY 2022, the ICO worked with Employee Relations to align and standardize sanctions (the consequences that result from misconduct) recorded in Convercent. In FY 2025, the top sanction was required training, followed closely by coaching. There were three terminations related to misconduct represented in our data in FY 2025, and ten resignations, most of which took place in lieu of termination or another sanction.

More than half of substantiated concerns in FY 2025 were about a VCU employee who manages other people, and 35% of substantiated concerns involved a subject with a senior leadership title such as “Chair,” “Assistant Dean,” or “Director.” Of the reports about a leader, three-quarters of them came directly to the ICO through our Helpline, email, or telephone.

Clery Act Compliance

Program Overview

Over the past year, the Clery Act Compliance Administrator, Chad Beights, has led a comprehensive reengineering of VCU’s Clery compliance program. This initiative included developing policies and procedures for both the university and internal departments. In collaboration with a project manager from the Finance and Administration team, a strategic plan was created to evaluate the current program and implement improvements where necessary. The key objectives of this effort were to enhance transparency, improve operational efficiency, and increase the effectiveness of compliance efforts by streamlining procedures, integrating technological solutions, and fostering greater collaboration among stakeholders.

This reengineering project is nearing completion, with only a few remaining action items. Significant updates include:

- Streamlining the reporting and review processes following incident submission.
- Developing and implementing an audit trail to document all reportable incidents included in the annual crime statistics disclosure.
- Establishing a reconciliation process involving all relevant reporting entities to ensure proper classification, prevent duplication, and produce accurate final statistics.

Clery Geography and Mapping

A core component of Clery compliance is the accurate identification of reportable geography. Building on an initial list developed by an external consultant, this project expanded the inventory of reportable locations and supported the creation of an official Clery map. A recurring review process for VCU properties has been established to ensure ongoing accuracy and compliance.

Campus Security Authority (CSA) Improvements

One project still in development involves the identification, notification, and training of Campus Security Authorities (CSAs). This initiative, a joint effort between Human Resources and the Clery Office, aims to centralize CSA tracking through Banner. The process incorporates revised HR workflows for position creation, changes, and transitions, ensuring CSAs are accurately designated and promptly informed of their responsibilities. Training for CSAs is delivered via the Talent learning management system. The new system integration allows the Clery Office to monitor training progress—capturing when training is initiated, completed, or overdue. Full implementation of this system is targeted for December 2025.

Training and Engagement

In April, the Integrity and Compliance Office hosted D. Stafford and Associates for a two-day Clery Act training attended by approximately 100 VCU employees. Attendees were selected based on their current involvement in Clery-related processes or because their departments intersect significantly with Clery requirements. Additional targeted training sessions were provided to units such as the Dean of Students Office, VCU Police, Title IX, and Residence Life and Housing.

Legislative Updates

Recent changes within the U.S. Department of Education (ED) have sparked questions regarding the future of the Clery Act. Although a substantial reduction in force occurred earlier this year—impacting nearly 50% of ED's workforce—the Clery group, which oversees audits and enforcement, has experienced minimal disruption. At a recent conference, an ED representative affirmed that the Clery Act remains firmly in place. Because the Act is codified in federal statute (20 USC 1092(f)), only Congress has the authority to repeal it—an unlikely scenario given Congress's recent bipartisan expansion of the Act through the Stop Campus Hazing Act (SCHA), signed into law in December 2024.

While the long-term effects of federal staffing changes remain uncertain, VCU remains committed to enhancing its Clery program, advancing transparency, and promoting a safe campus for all.

Stop Campus Hazing Act Implementation

Signed into law by President Biden on December 23, 2024, the Stop Campus Hazing Act (SCHA) amends and renames the Clery Act as the “Jeanne Clery Campus Safety Act.” The SCHA introduces three major requirements:

1. Inclusion of Hazing Statistics in the university’s Annual Security Report.
2. Implementation of Hazing Policies, including those focused specifically on prevention.
3. Creation of a Campus Hazing Transparency Report summarizing findings for any student organizations found in violation of university hazing policies.

VCU’s implementation of the SCHA has involved coordinated efforts between the Clery Compliance Administrator, Dean of Students Office, Student Conduct; Academic Integrity, Fraternity & Sorority Life, and University Counsel.

Training and Communications

Annual Ethics & Compliance Training

The ICO took a data-driven approach to the FY 2025 annual training. Using feedback from the employee integrity survey released during the spring and compiled during the summer of 2024, we identified two opportunities for development. The first was in response to 54% of responding employees reporting they did not feel safe with questioning the decisions or conduct of senior leaders. We shared this result

Fig. 1

(Fig. 1), then developed a lesson around the benefits of speaking up, giving real-life examples of improvements that happened at VCU as a result. We also created a lesson on “Listening Up,” to better prepare leaders for conversations that result from people speaking up.

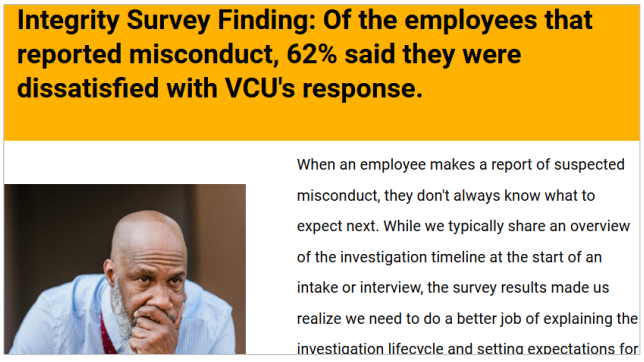


Fig. 2

The second piece of training we developed addressed the 62% of responding employees who reported misconduct and felt dissatisfied with VCU's response. Here, we created a lesson to set expectations for what happens when an employee makes a report, and what takes place during the investigation process (Fig. 2 and Fig. 3).

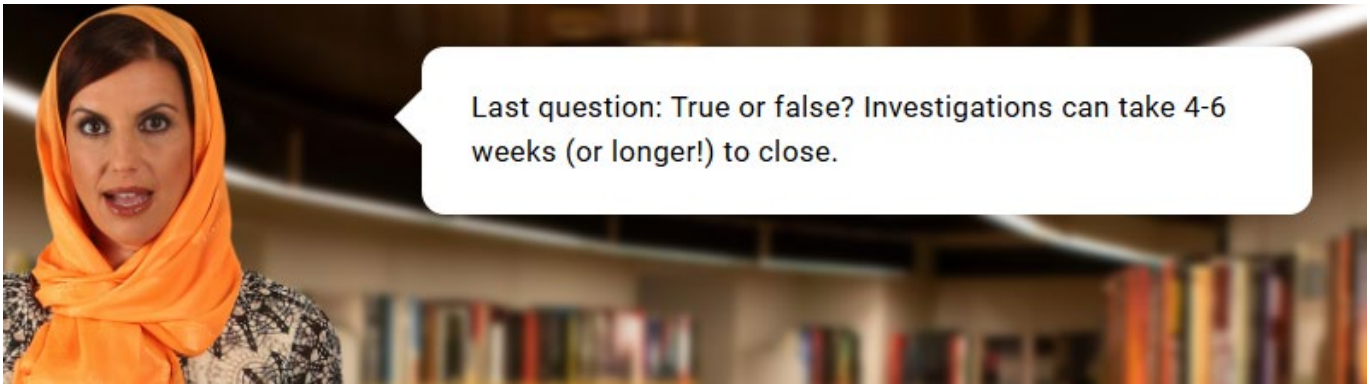
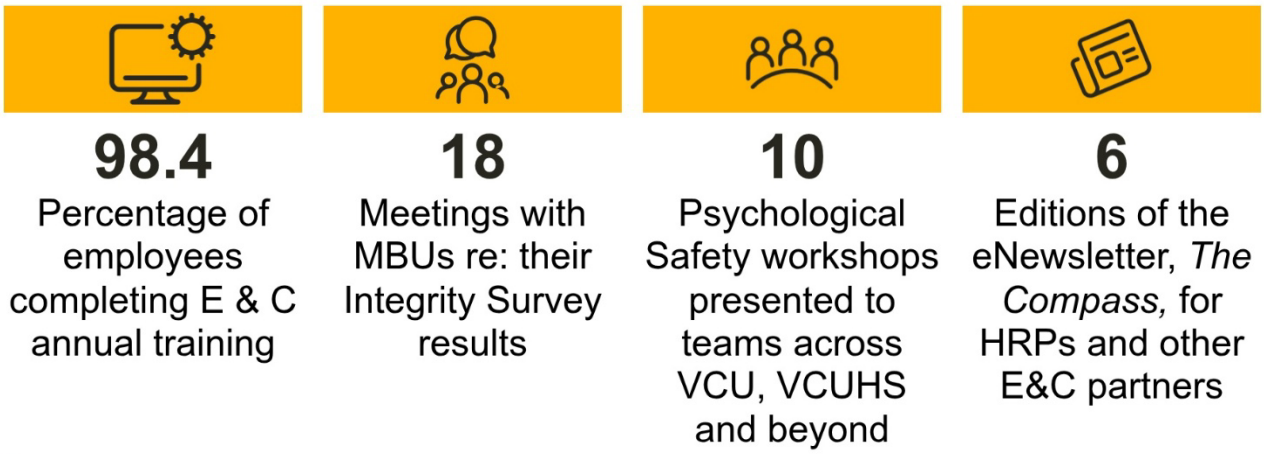


Fig. 3

Post-training survey data revealed that employees liked the real-world examples from VCU as well as the interactive exercises. Completion rates were high again this year (98.4%), since employees failing to complete their required annual training curriculum faced consequences, including the loss of system access.

In an effort to expand ethics and compliance training, ICO has created a separate role for a communications specialist. This new team member will assume responsibility for communications for the team, freeing up the Program Manager, Training and Communications to execute our evolving training strategy. As part of that strategy, we will connect more intentionally with onboarding employees, with focused messaging and a new course on ethics and compliance at VCU.



Ongoing Training and Communication Efforts

As part of its mission to increase awareness about ethics and compliance issues and to connect more broadly with the university community, the ICO continued some existing education efforts and created some new ones. Highlights included the following:

- Facilitated our workshop on Psychological Safety for ten teams across both campuses, including those in Faculty Affairs, the Office of the President, Housekeeping, Student Affairs Leadership Team and the College of Health Professions Leadership Team. Workshops are scheduled by request and tailored for each audience, and are based on the work of Harvard Business School researcher Amy Edmondson.
- Co-facilitated meetings with 18 MBUs to discuss their units' Integrity Survey results. These meetings allowed us to highlight successes and opportunities relating to the culture of each unit and led to some valuable discussions. In several instances, topics shared during these meetings uncovered needs; we responded to these needs by creating new training materials and featuring those topics and materials in *The Compass* newsletter for our compliance partners at VCU.
- Continued publication of *The Compass*, our monthly newsletter sent to a targeted audience, the Human Resource Professional (HRP) team and members of the Compliance Advisory Committee (CAC) and Compliance Steering Committee (CSC). By targeting this audience for our readership, we can disseminate key content and timely information through them and to their teams.
- Adapted several years of archived case studies written for our ICO blog for the ICO Resource Library, found on our website (acs.vcu.edu/our-office/ico/resource-library). Case studies can be read online or printed and shared as part of discussions about ethical dilemmas. which provides employees with access to downloadable and printable content as well as videos and eLearning modules with an ethics and compliance theme.
- Continued to publish the quarterly policy newsletter, *Policy Quarterly,* which highlights new and revised policies from the previous quarter.

Outreach to compliance partners and other employees across the university and beyond took several forms this year.

- Upon request, and in the spirit of goodwill for another institution of higher education, we brought the Psychological Safety workshop to the STEM department at Virginia Peninsula Community College. This led to an additional request to bring the workshop to their Enrollment Management and Student Success unit and this took place in June via Zoom.
- Consulted with several partners about creating compliance training tailored for their needs.
- Participated in a workgroup to coordinate required training across units for annual releases through Human Resources.
- Sponsored tables at university events like the Weeks of Welcome (WOW) and the Tech and Benefits Fairs to promote the VCU Helpline and educate the VCU Community about our mission.

Risk Assessment and Monitoring

Lack of Procedural Rigor

This past year, the ICO identified several instances where an outcome was achieved at the expense of the required procedural rigor. These situations occur as the university and its employees face everyday challenges that demand expediency. The ICO found that sometimes individuals skirt the required processes and checks and balances in service of the need for a quick or efficient outcome. This tendency itself creates risk. Checks and balances exist to ensure that decisions are made and executed

in a deliberate way and not in a way that could cause the university harm. To mitigate this risk, VCU must continue to educate and set expectations for all employees regarding procedural rigor as a foundational requirement of our internal control system for which individuals are personally accountable.

Current Compliance Enforcement Environment: Volatility, Uncertainty, Complexity, Ambiguity

As the VCU administration has continually noted, the higher education regulatory compliance environment is fast-changing and uncertain at present and presents a continuing and growing risk. VCU has worked hard to mitigate this risk by closely monitoring the developments in Washington D.C. and proactively addressing regulatory changes as they occur. We must remain vigilant and continue to both respond to and proactively anticipate changes. We must also begin to ensure that our monitoring is integrated into normal operating processes, not just special projects.

Culture

As noted in past Annual Reports, VCU employees are increasingly worried about retaliation for speaking up. While this concern has not stopped people from contacting the ICO with concerns, as evidenced by our increase in the number of cases, we must address concerns about retaliation and actual retaliation when it occurs. We believe that this perception of retaliation could over time erode the progress we've made in creating a speak-up culture at VCU. Mitigation of this risk requires leadership support for educating leaders and a commitment to accountability for those who violate our policies.

Conflicts of Interest and Commitment

Two years ago, VCU developed and implemented a comprehensive conflict of interest and commitment policy and reporting process campus-wide. While overall individual participation in this program is strong, there have been several instances this past year where risk was created because individuals either did not disclose potential conflicts, or leadership did not use the disclosed data to inform decisions. VCU faculty and staff are enterprising, but are generally not as informed about the importance of disclosing and mitigating conflicts. ICO will work to mitigate this risk by reengaging with leaders on the importance of managing COIs and providing them the tools to do so.

Conclusion

FY 2025 was a challenging year both in terms of case volume and case complexity, in addition to the uncertainty in the regulatory compliance area. The ICO faced growing pains. Not only did our case management function face a workload increase, the demand for our educational programming increased as did the demand for our communications and outreach programs. We have deliberately sought to increase our profile and our impact. Our increased case volume and the use of our programs shows we have been successful. We are very much looking forward to further increasing our offerings and our proactive approach to ethics and compliance as we add two new positions, one working on communications and one working on further strengthening our Clery program in the coming weeks. We believe that the ICO is well-positioned to continue to have a positive impact at VCU as a compliance partner, a neutral third-party that can be counted on to investigate and evaluate facts when alleged

misconduct is reported, and a resource for identifying trends, lessons learned and opportunities to mitigate risk.