VIRGINIA COMMONWEALTH
BOARD OF VISITORS
AUDIT, INTEGRITY AND COMPLIANCE COMMITTEE
MARCH 21, 2024
12:00 pm
James Branch Cabell Library
901 Park Avenue – Room 303

AGENDA

1. CALL TO ORDER
   Mr. Peter Farrell, Chair

2. ACTION ITEMS
   (1 minute)
   a. Approval of Minutes December 7, 2023
   Mr. Peter Farrell, Chair

FOR INFORMATION:

3. REPORT FROM EXECUTIVE DIRECTOR OF AUDIT AND COMPLIANCE SERVICES
   (20 minutes)
   a. Committee Dashboard Measures
   b. Internal Audit Reports
      i. Service Contract Management
      ii. SCHEV Reporting
   c. Handout: Audit Work Plan Status FY24
   d. Modification of FY2024 Audit Work Plan
   e. Ethics and Compliance Update
   Mr. David Litton, Interim Executive Director, Audit and Compliance Services
   Ms. Suzanne Milton, Chief Ethics and Compliance Officer

4. DATA GOVERNANCE UPDATE
   (15 minutes)
   Mr. Michael Bourgeois, Associate Vice Provost, Institutional Research and Decision Support

5. INFORMATION TECHNOLOGY UPDATE
   (10 minutes)
   Mr. Alex Henson, Chief Information Officer

6. EQUITY AND ACCESS SERVICES UPDATE
   (15 minutes)
   Ms. Cleopatra Magwaro, Associate Vice President, Equity and Access Services
7. **CLOSED SESSION – Freedom of Information Act**  
   Sections 2.2-3711 (A)(7), (8), and (19), specifically: (10 minutes)

   a. Audit Reports for Discussion
      i. Sunapsis ICCR

   b. University Counsel Litigation Update

8. **RETURN TO OPEN SESSION AND CERTIFICATION**

   Resolution and Certification

   Action Items, if any

9. **ADJOURNMENT**
The new Associate Vice Provost for Institutional Research and Decision Support joined VCU in mid-fall. Efforts continue to evaluate and strengthen the policy and process infrastructure around data governance, to reconstitute the data governance committee to better cover all data domains and to install a tactical data governance team to enact day-to-day governance. Early priority continues to focus on standardizing and enhancing the collection and maintenance of faculty data, with active projects underway to revitalize the system used to collect faculty credentials and report those as necessary. Efforts to relaunch the data warehouse effort will resume in the spring.
Security Incidents and Trends: VCU has not directly experienced any cybersecurity incident in the past quarter that led to any significant impact. However, threat actors are continuing to evolve their tactics, and VCU is actively monitoring vulnerabilities and threats and assessing its own environment and capabilities to manage the risks.

Enhancement of multifactor authentication (MFA) system: In response to modern threats that can allow threat actors to bypass traditional MFA systems, VCU is enhancing its existing MFA system with phishing-resistant features designed to better safeguard the credentials of VCU employees, students, and affiliates from sophisticated MFA bypass attacks. Enhancements to DUO are rolling out in March, 2024.

Next generation security architecture: VCU is continuing to fully implement a location-agnostic and Zero-Trust security architecture Secure Access Server Edge, or SASE). The completion of VCU’s SASE deployment has allowed VCU to gain unprecedented protection and visibility for its workforce regardless of location, and continuous enhancements are being made to the platform. Between November 1, 2023 and January 31, 2024, the VCU SASE platform has inspected over 3.8 billion network transactions and stopped 3.07 million threats targeting VCU computers and resources. In addition to the continuous SASE development, VCU is in the process of deploying advanced endpoint protection technology to all managed computers. Previously reserved for the highest sensitivity assets, these advanced endpoint protection systems will provide further protection for all computers against modern threats and further reduce the university’s cyber risks.

Secured Research Environment: The Secured Research environment is still in piloting phase, awaiting migration to the new VCU data center before it is opened to the broader population. Additional work is being performed to ensure the research data pipeline is adequately provisioned to support the environment. Gramm-Leach-Bliley Act (GLBA) Compliance: VCU has successfully reviewed and addressed the additional gaps between its practices and the new GLBA safeguards rule. A security penetration test is

**ERM PROGRAM**

**Status of ERM mitigation plans**

- Program progressing on schedule
- Program not on schedule; ERM Committee to address.
- Program significantly behind schedule; Executive Management attention required.

The ERM Steering Committee has voted three (3) risks previously out of tolerance back within tolerance. This decision will be reviewed by the Cabinet in September for approval and presented to the Board in December.

**PLANNED AUDIT STATUS**

**PLANNED AUDITS** (status of audits - planned and unplanned to available resources)

**SPECIAL PROJECTS** (status of special projects - planned and unplanned to available resources)
The audit plan is progressing well; however we are short one university auditor position and plan to hold on filling the position to accommodate FY24 budget cuts. The audit team is assessing how the vacancy will affect our workplan schedule and will defer lower risk audits until later in the year. Investigations have been increasing and this work further affects our workplan schedule, but currently we are managing this work effectively.

INSTITUTIONAL COMPLIANCE PROGRAM

Compliance requirements compared to known material violations

Compliance Program Oversight & Effectiveness

- No known material noncompliance; or ownership and accountability for compliance risks are established and operating at explicitly or implicitly approved levels of risk tolerance or appetite
- Challenges encountered that have an impact on visibility, verification, strategy implementation or resolution
- Significant challenges to institutional compliance strategy or resolution encountered

Notes: There are no known material compliance violations related to regulatory, legal or university policies. The Integrity and Compliance Office (ICO) is on track with a three-year workplan focused on improving effectiveness in six areas: Program Structure, Culture, Policies, Investigations/Accountability, Training/Communication, Risk Assessment/Monitoring. Also good progress in building trust with departments and schools so that they understand how we can support them with independent reviews and guidance. (examples: School of Nursing, School of Pharmacy, VCU Police, VCU Arts Qatar, OVPRI, Office of the Provost, Facilities, School of Medicine).
Service Contract Management

Final Report
February 19, 2024

Audit and Compliance Services
Overview

Procurement Services (Procurement) has an oversight role in managing decentralized service contracts administered by various departments, including units and schools. Procurement designates department contract stakeholders within the departments to administer contracts, which includes monitoring vendor performance and ensuring vendors adhere to the terms and conditions of the contract.

Department contract stakeholders are designated in one of two ways. If the contract is less than $10,000, RealSource (the University’s procure to pay system) automatically designates the submitter of the contract request as the stakeholder. If $10,000 or greater, the assigned buyer designates the contract requestor as the stakeholder.

Procurement also provides decentralized administration for widely utilized contracts such as; printing, lab, and office services as well as support to centralized administration units such as the units shown below. Both types of contracts total more than $107 million annually.

- Business Services (Dining, Mail, and Bookstore)
- Campus Security
- Parking and Transportation Services
- Technology Services

In addition, the Facilities Management Department (FMD) contract administration team centrally manages select service contracts with a value of approximately $26 million between the Monroe Park and VCU Health Sciences campuses. FMD contract administrators are responsible for ensuring vendors bill the university accurately, the university pays invoices timely, and vendors adhere to the contract’s terms and conditions.

FMD contract administrators centrally manage the following types of service contracts (not all inclusive):
- Custodial
- Waste management
- Building automation systems
- Electrical
- Fire systems
- HVAC, mechanical and refrigeration

Purpose

The objective of the audit was to determine whether there were adequate procedures for the management of centralized and decentralized service contracts.
Scope and Audit Procedures

Our scope of Service Contract Management encompassed centralized and decentralized administration of service contracts; vendor performance per the contract’s terms and conditions, monitoring of vendor performance, and timely and accurate payment to vendors.

Audit procedures consisted of the following:

- Interviews with personnel in FMD’s contract administration
- Meetings with Procurement
- Review of:
  - Procurement’s procedures for contract management for decentralized contracts
  - FMD’s contract administration team's monitoring procedures for service contracts
- Evaluation of:
  - Compliance with Procurement’s Prompt Pay policy for a select sample of contracts
  - Quality assurance inspectors’ performance checks in relation to the FMD custodial contract
  - A select sample of centralized and decentralized service contracts to determine if evergreen clauses were present
- Testing a select sample of contracts for:
  - Vendor compliance with terms and conditions for a select sample of contracts
  - Vendor completion of projects and/or services in a timely manner
  - Sign off by zone supervisor and/or end users that vendors completed work satisfactorily
  - Timely and accurate payments to vendors

Conclusion

In our opinion, based on the results of our audit, there were adequate procedures for the management of centralized and decentralized service contracts.

A recommendation to strengthen Procurement Services’ communication process with department contract stakeholders was included in a separate report furnished to management.

Prior to releasing this report in final form, the draft report was reviewed by, and management's action plans were provided or approved by, the following officials:

Sylvia Britt  Director of Support Services and Contract Management
Richard Sliwoski  Associate Vice President of Facilities Management
Ramona Taylor  Assistant Director, Contracts and Compliance, Procurement Services
John McHugh  Director of Procurement Services
Patricia Perkins  Associate Vice President for Finance
Meredith Weiss  Interim Vice President for Finance and CFO and Vice President for Administration

Our audit was conducted in conformance with the *International Standards for the Professional Practice of Internal Auditing* and included an evaluation of internal controls and such procedures as we considered necessary in the circumstances.

_______________________________
Interim Executive Director
Audit and Compliance Services
SCHEV Reporting

Final Report
February 26, 2024

Audit and Compliance Services
Overview

The State Council of Higher Education in Virginia (SCHEV) maintains data and statistics about Institutions (Institutions) of Higher Education on their website for public information. Institutions provide data and statistics according to SCHEV’s Data Collection Calendar and instructions on how to submit data. The calendar lists reports to submit and deadlines for submission, and links to reporting instructions.

VCU SCHEV Reporting Responsibility

Institutional Research and Decision Support (IRDS) shares data collection and reporting efforts with VCU departments. Departments are responsible for data collection, verification and security and IRDS develops methods departments use to extract information from authoritative data systems. The SCHEV reporting process is data intensive, requiring appropriate data sourcing to ensure accurate and timely reporting.

Data Sourcing

Banner is the university’s system of record that contains financial, student, and human resources data and is the authoritative data source for SCHEV reporting. Banner's Operational Data Store (ODS) is a copy of the production database that aggregates and centralizes data for reporting capabilities. Departments obtain some data elements outside of the ODS such as departments' projected tuition and fees, and admissions data from Health Sciences schools that use separate systems to manage this data. IRDS develops SQL code and scripts in the ODS to extract data for Strategy, Enrollment Management and Student Success to meet their SCHEV reporting requirements. Below are many of the data elements Strategy, Enrollment Management and Student Success reports to SCHEV:

- **Strategy, Enrollment Management and Student Success** – Semester enrollments and headcounts, degrees conferred, fall and spring cohorts, early enrollment, student financial aid, and admissions summaries (including first time freshmen and admission requirements for example)

In addition, several departments are responsible for compiling data which they report to SCHEV, below are examples of data they report:

- **Grants and Contracts** – Sponsored research activities
- **Office of Budget, Resource and Financial Analysis** – Tuition and fees
- **Facilities Management** – Space utilization

To assist data compilation efforts, SCHEV provides instructional guides on report preparation. IRDS references these guides to prepare internal step by step instructions for preparation of reports produced for Strategy, Enrollment and Student Success. IRDS also provides guidance and logistical support for student financial aid reporting.
Purpose

The objective of the audit was to determine whether sufficient measures were in place to ensure that VCU submits required SCHEV reports timely and accurately.

Scope and Audit Procedures

Our scope of the audit of SCHEV Reporting encompassed processes of developing data for SCHEV required reports, data management and sourcing for data used in SCHEV reporting, and verification of report data.

Our audit procedures included
- Process interviews and demonstrations with process owners for the various reporting units
- Review of:
  - Process instruction narratives
  - The SCHEV reporting calendar
  - Verification of codes used in producing data
- Inquiries of verification, monitoring and confirmation methods
- Examination of data manipulation processes

Conclusion

In our opinion, based on the results of our audit, sufficient measures were in place to ensure that VCU submits required SCHEV reports timely and accurately.

Prior to releasing this report in final form, the draft report was reviewed by the following officials:

Constance Peyton Director, Institutional Research
Michael Bourgeois Associate Vice Provost for Institutional Research and Decision Support
Hernan Bucheli Interim Vice President for Strategic Enrollment Management and Student Success
Fotis Sotiropoulos Provost and Senior Vice President for Academic Affairs

We conducted our audit in conformity with the International Standards for the Professional Practice of Internal Auditing and included an evaluation of internal controls and such procedures as we considered necessary in the circumstances.
Audit and Management Services  
Status of Fiscal Year 2023-2024 Audit Work Plan  
February 29, 2024

<table>
<thead>
<tr>
<th>Area</th>
<th>Status</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Current Year Risk-based Audits and Assessments</strong></td>
<td></td>
</tr>
<tr>
<td>Financial &amp; Operational Audits:</td>
<td></td>
</tr>
<tr>
<td>President’s Office ICCR</td>
<td>Completed</td>
</tr>
<tr>
<td>SCHEV Reporting</td>
<td>Completed</td>
</tr>
<tr>
<td>Service Contract Management</td>
<td>Completed</td>
</tr>
<tr>
<td>Ancillary Systems Integrity</td>
<td>In Progress</td>
</tr>
<tr>
<td>VCU Card Office</td>
<td>In Progress</td>
</tr>
<tr>
<td>Telecommunications</td>
<td>In Progress</td>
</tr>
<tr>
<td>Qatar Campus ICCR</td>
<td>In Progress</td>
</tr>
<tr>
<td>Human Resources – Compensation</td>
<td>Not Started</td>
</tr>
<tr>
<td>Facilities Management – Deferred Maintenance</td>
<td>Not Started</td>
</tr>
<tr>
<td>College of Health Professions ICCR</td>
<td>Not Started</td>
</tr>
<tr>
<td>Online Distance Learning*</td>
<td>Not Started</td>
</tr>
<tr>
<td>Procurement Office ICCR*</td>
<td>Not Started</td>
</tr>
<tr>
<td><strong>IT Audits:</strong></td>
<td></td>
</tr>
<tr>
<td>Sunapsis (Visa Management) System Review</td>
<td>Completed</td>
</tr>
<tr>
<td>Canvas IT Security Review</td>
<td>In Progress</td>
</tr>
<tr>
<td>Massey Cancer Center IT Review</td>
<td>In Progress</td>
</tr>
<tr>
<td>Centers and Institutes Technical Review</td>
<td>Not Started</td>
</tr>
<tr>
<td>Pyramed (Student Health) System Review</td>
<td>Not Started</td>
</tr>
<tr>
<td><strong>Annual Engagements and Activities</strong></td>
<td></td>
</tr>
<tr>
<td>VCU Police Department – Unannounced Property Inspection – FY24 Part 1</td>
<td>Completed</td>
</tr>
<tr>
<td>President’s FY 23 Discretionary Fund and Travel Activity Review</td>
<td>Completed</td>
</tr>
<tr>
<td>Audit Risk Assessment for FY 2025-2027 Three Year Plan</td>
<td>In Progress</td>
</tr>
<tr>
<td>Annual Review of Audit Recommendations Outstanding – FY24</td>
<td>In Progress</td>
</tr>
<tr>
<td>VCU Police Department – Unannounced Property Inspection – FY24 Part 2</td>
<td>Not Started</td>
</tr>
</tbody>
</table>
### Audit and Management Services
#### Status of Fiscal Year 2023-2024 Audit Work Plan
**February 29, 2024**

<table>
<thead>
<tr>
<th>Special Project</th>
<th>Status</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Continuing Projects</strong></td>
<td></td>
</tr>
<tr>
<td>State Employees Fraud, Waste, and Abuse Hotline</td>
<td>In Progress – 2; Closed – 1</td>
</tr>
<tr>
<td>Special Projects</td>
<td>In Progress – 1; Closed – 5</td>
</tr>
<tr>
<td><strong>Other Projects</strong></td>
<td></td>
</tr>
<tr>
<td>Facilities Management and Accounts Payable Project</td>
<td>Completed</td>
</tr>
</tbody>
</table>

*Audits removed for FY 2024 due to vacancies and increase in special projects. Will reconsider these audits in the upcoming 2025 risk assessment and three-year audit plan.*
For Action: Approval of Minutes

- Audit, Integrity and Compliance Committee Meeting held on December 7, 2023
- Motion to approve the Minutes
Committee Dashboard Measures

- Data Governance Program
- Data Security
- ERM Mitigation Plans
- Planned Audits
- Planned Special Projects
- Ethics and Compliance Program Oversight
Service Contract Management

Conclusion: There were adequate procedures for the management of centralized and decentralized service contracts.

No Board Level Findings

Audit Scope:
• Vendor performance per the contract’s terms and conditions
• Monitoring of vendor performance
• Timely and accurate payment to vendors
SCHEV Reporting

Conclusion: Sufficient measures were in place to ensure that VCU submits required SCHEV reports timely and accurately.

No Findings

Audit Scope:
- Processes of developing data for SCHEV required reports
- Data management and sourcing for data used in SCHEV reporting
- Verification of report data
VP’s attested that 26 of 32 audit recommendations outstanding are on target to meet their due date. Full schedule provided in handouts.

<table>
<thead>
<tr>
<th>Finding</th>
<th>Due Date</th>
<th>Revised Due Date</th>
<th>VP on Target</th>
</tr>
</thead>
<tbody>
<tr>
<td>Include the Data and Intellectual Property Addendum in the Maxient Contract (Maxient IT Control Review)</td>
<td>Jan 2024</td>
<td>March 2024</td>
<td>N</td>
</tr>
<tr>
<td>Evaluate and Improve Usage of the BlackbaudAward Management System Globally (Unused Scholarships)</td>
<td>Dec 2023</td>
<td>December 2024</td>
<td>N</td>
</tr>
<tr>
<td>Strengthen Policy Statements for Clarity and to Designate Process Ownership (Unused Scholarships)</td>
<td>Dec 2023</td>
<td>December 2024</td>
<td>N</td>
</tr>
</tbody>
</table>
## Audit Findings Status Update

### Continued

<table>
<thead>
<tr>
<th>Finding</th>
<th>Due Date</th>
<th>Revised Due Date</th>
<th>VP on Target</th>
</tr>
</thead>
<tbody>
<tr>
<td>Improve Banner Reconciliation Process</td>
<td>Aug 2023</td>
<td>August 2024</td>
<td>N</td>
</tr>
<tr>
<td>(University College Internal Control Compliance Review)</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Improve Records Management Processes</td>
<td>Sept 2023</td>
<td>April 2024</td>
<td>N</td>
</tr>
<tr>
<td>(Global Education Internal Control Compliance Review)</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Improve ARMICS Testing and Documentation</td>
<td>April 2024</td>
<td>May 2024</td>
<td>N</td>
</tr>
<tr>
<td>(Global Education Internal Control Compliance Review)</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

N – Target in Jeopardy or Already Missed
Item For Information

Discussion of Modification to FY2024 Audit Work Plan
Integrity and Compliance Mid-year Report
Fiscal Year 2024
Reported Concerns Mid-year Update

- Reported concerns volume steady compared to last year
- Substantiated cases demonstrate comfort of students, staff in reporting despite pressure, fear of retaliation
- Anonymous rate continues to be low (21%) indicating trust in the process
- Top substantiated matters
  - Ethics violations (6)
  - Health and safety (4)
  - Abuse of power (2)
  - Fraud/accounting issues (2)
Good progress on first distribution of COIC questionnaire to faculty/select staff; continue to support supervisors in reviewing, resolving disclosures.

2,039 employees received the questionnaire prompting disclosures.

804 disclosures of outside activities or relationships have been submitted so far.

**Most Common Disclosure Types**
- Outside Activity: 608
- Immediate Family: 60
- Personal Services: 48
- Relationship at VCU: 30

**Questionnaire Completion as of 3/1/24**
- Complete: 82%
- Incomplete: 18%
Culture: Integrity Survey Launches April 5, 2024

- Hosted externally by Ethics and Compliance Initiative (ECI) to ensure maximum comfort and confidentiality for responders.

- 15 questions, all but two benchmarked to larger U.S. data set and/or smaller data set of other colleges and universities, designed to get at key perceptions of culture and integrity.

- ICO will report this data to business units and departments, and actively partner with them to understand their results and make progress in sustaining a culture of integrity and openness.
Why Measure Culture

When leaders demonstrate a commitment to ethics, workplace integrity improves significantly.*

In December, 2023, **VCU issued a correction to its Clery data for 2021 and 2022** in four categories, based on a staff error. The correction was **accompanied by a press release** explaining what happened and committing to improve our data collection process. As required by the Clery Act, we also **posted the corrected copy** and notified our VCU community of the change.

**VCU Police hired a consultant** to perform a **review of our data collection and consolidation process** for the Annual Security Report. The consultant **conducted a site visit and interviews on March 6 and 7** and **will issue his report and recommendations soon**.

**VCU has created a Clery Executive Review Committee** that will **receive and review the Annual Security Report and Clery data 45-60 days before release** each year. This committee will be **chaired by our office (ICO)** and will also include **Safety and Risk Management, Student Affairs, EAS** and others, as needed. VCU has also **reinstituted regular collaboration meetings involving VCU Police, Student Affairs, Title IX** and others to ensure timely **data comparison/validation** throughout the year.
Data Governance Update

Michael Bourgeois, Ph.D.
Associate Vice Provost, IRDS
You can’t manage what you don’t define

“Data Governance is a system of decision rights and accountabilities for information-related processes, executed according to agreed-upon models which describe who can take what actions with what information, and when, under what circumstances, using what methods.”

Data Governance Institute retrieved 11.28.2023
Data governance, with a data strategy, is the foundation for institutional data maturity.
What does a mature, data and analytic-informed institution look like?

- Data are valid & reliable
- Data system ensures consistency and quality
- There are minimal intermediaries; they are responsive to changing needs
- Centralizing unit & data managers have strong partnerships
- Data are centrally stored & maintained
- Data access is simple
What solutions do we need to get there?

- Break through silos and improve data integration
- Ensure data consistency and reliability
- Increase availability of data to stakeholders

Elevate trust to add value to a data-informed culture
Where are we now?

We are aligning our DIMC efforts to support a mature data culture

We are evaluating existing and potential data warehouse solutions

Culture shift: There is a desire for data maturity

The response rate from data owners is improving

We are modernizing and creating new data dashboards
Our Path Forward

Formalize a Data Strategy
What do we want to achieve? How can data get us there?

Master Data Management
Audit, design, propose, and build. Organize assets in one location & standardize definitions.

Revise & Relaunch Data Governance
Establish policies, roles, and responsibilities around how we engage data.

Champion the New Vision
Host learning sessions and facilitate bi-directional communication for data stewards.
Information Technology Update

Alex Henson, Chief Information Officer
Major Project Updates

Technology Operations Center
Generative AI Infrastructure and Support
VCU Alert Model Changes
VCU Mobile App Redesign
Research Computing Environment Review
Technology Operations Center

Key Milestones:
- Notified of requirement to vacate 900 E. Main in April, 2021
- Construction of new building approved by BOV in October, 2021
- Construction started in Spring, 2022
- Building completed in March, 2024
- Data Center Migration underway with expected completion July, 2024

Scope of Data Center Migration:
- Rebuilding entire campus data and telephony network in new facility
- 256 pieces of equipment presently in scope
  - 154 new devices to be installed in TOC
  - 102 devices to be moved from 900 E. Main
- Miles of fiber will be rerouted/installed
- No substantial down time allowed
- Decommissioning of 900 E. Main facility
Security Updates

Mandatory IT Security Training

Multi Factor Authentication Changes

Security Infrastructure Improvements
Audit & Compliance Activity

- Internal Audits: Average of 5 per year
  - 3 risk based IT audits larger in scope
  - 2 IT control reviews
- Annual IT Control Review by Virginia Auditor of Public Accounts
- Annual Penetration Testing as part of GLBA and PCI DSS compliance
- This Year: Cybersecurity Audit of Higher Ed institutions being conducted by Office of the State Inspector General
- Information Security Office conducts Security and Accessibility Reviews of IT purchases through VCU IT Governance
- Information Security Office conducts annual review of key third party providers
Equity & Access Services
Overview
EAS achieves compliance with state and federal civil rights laws and regulations across 4 units:

- ADA/Accessibility Services Office
- Equal Opportunity and Affirmative Action Office
- Protection of Minors Office
- Title IX Office

Our Annual Reports highlight our data. There has been improvement in data collection since 2021, and we will have more robust trends data for comparison, over time.
ADA & Accessibility
ADA accommodations data highlights how flexibility creates inclusion.

Accommodations offered show a correlation with COVID– FY2020-FY2023.

Most ADA accommodations—47.6% = zero dollars spent.
Equal Opportunity & Affirmative Action
Majority of complainants are students, while majority of respondents are faculty & staff.

Most concerns do not rise to the level of illegal discrimination.
Protection of Minors
Minors fully migrated to EAS in 2023. As the Minors program strengthens, we will gather more data and trends.

EAS led identification of Minors as an emerging risk across VCU, through the Enterprise Risk Management steering subcommittee.

Increasing programs that build strong ties to VCU’s brand and mission creates future students.
13,104 sexual assault awareness trainings completed.

**Alleged conduct reported FY23:**

- 21.3% - sexual harassment
- 16.7% - rape
- 14.3% - fondling
- 14% - stalking
- 12.4% - sexual exploitation
- 10% - dating violence
- 7.8% - conduct outside TIX / SBM policies (not in jurisdiction)
- 3.2% - domestic violence
- 0.3% - retaliation

Most complainants and respondents were not affiliated with VCU.
Thank you for your interest in civil rights outreach and support at VCU

Cleopatra Magwaro
Associate vice president, equity and access services
Office of the President

Address: 912 West Grace Street, Richmond, VA
Email: magwaroc@vcu.edu
Website: https://equity.vcu.edu/
Closed Session