



Board of Visitors

AUDIT, INTEGRITY AND COMPLIANCE COMMITTEE

9:15 am

May 8, 2025

The Honorable Benjamin Lambert, III Board Room

1213 East Clay Street

Richmond, Virginia

MINUTES

DRAFT

BOARD MEMBERS PRESENT

Ms. Ellen Fitzsimmons, Vice Chair

Dr. Dale Jones

Mr. P2 Sandhu

Dr. Kenneth Lipstock

OTHER BOARD MEMBERS PRESENT

Mr. Todd Haymore, Rector

OTHERS PRESENT

Dr. Michael Rao, *President*

Ms. Suzanne Milton, *Chief Audit and Compliance Executive, University Audit and Compliance Services*

Mr. Jacob A. Belue, *Associate University Counsel*

Staff from VCU

CALL TO ORDER

Ms. Ellen Fitzsimmons, Vice Chair, called the meeting to order at 9:10 a.m.

APPROVAL OF MINUTES

Ms. Fitzsimmons asked for a motion to approve the minutes of the March 20, 2025 meeting of the Audit, Integrity and Compliance Committee, as published. After motion duly made and seconded the minutes of the March 20, 2025 Audit, Integrity, and Compliance Committee meeting were approved. A copy of the minutes can be found on the VCU website at the following webpage <https://bov.vcu.edu/meetings/minutes/>.

APPROVAL OF ACTION ITEMS

The committee reviewed and discussed four action items, the review and approval of the Audit, Integrity and Compliance Committee Charter and Meeting Planner, the Audit, Integrity and Compliance Department Charter, Internal Audit's FY2026 Work Plan and FY2026 Ethics and

Compliance Program Initiatives. On a motion duly made and seconded the action items were unanimously approved to recommend to the full board.

FOR INFORMATION

Auditor of Public Accounts (APA) Entrance Conference for FY2023 Audit

Amy Stokes, APA Audit Director, discussed the planning, timing and scope for the FY2025 annual financial audit. Ms. Stokes also discussed auditor and management responsibilities and audit report communications.

Audit, Integrity and Compliance Committee Dashboard Measures

Suzanne Milton presented the current status of the dashboard measures. Indicators for Data Security, Planned Audits and Institutional Compliance Program were yellow and other indicators were green.

Report from the Chief Audit and Compliance Executive

Suzanne Milton briefed the committee on the results of the School of Education Internal Control Compliance Review which had no board level findings. Jason Block, Chief Ethics and Compliance Officer, briefed the committee on the outcomes and status of the Clery Act Remediation project.

Enterprise Risk Management (ERM) Update

Tom Briggs, Chief Risk Officer, Enterprise Risk Management, Finance and Administration provided an update on the Enterprise Risk Management program.

Data Governance Update

Michael Bourgeois, Associate Vice President, Institutional Research and Decision Support provided an update on the Data Governance program.

A copy of the power point is attached hereto as **Attachment A** and is made a part hereof.

CLOSED SESSION

Ms. Fitzsimmons moved that the Audit, Integrity, and Compliance Committee of the Virginia Commonwealth University Board of Visitors convene a closed session under Section 2.2-3711 (A)(19), of the Virginia Freedom of Information Act for the discussion of information where discussion in an open meeting would jeopardize the safety of any person or the security of any facility, building, structure, information technology system or software program, more specifically relating to discussion of an audit reporting concerning an information technology system, Section 2.2-3711 (A) (1) for discussion, consideration, performance and disciplining of specific public officers, appointees or employees of any public body; and evaluation of performance of departments or schools of public institutions or higher education where such evaluation will necessarily involve discussion of the performance of specific individuals, more specifically to discuss a disciplinary matter related to procurement, Section 2.2-3711 (A) (7), for updates on potential and current litigation in state and federal courts where such consultation or briefing in

open meeting would adversely affect the negotiating or litigating posture of the public body, more specifically relating to an update from counsel pertaining to actual or probable litigation.

RECONVENED SESSION

Following the closed session, the public was invited to return to the meeting. Ms. Ellen Fitzsimmons, Vice Chair, called the meeting to order. On motion duly made and seconded the following resolution of certification was approved by a roll call vote:

Resolution of Certification

BE IT RESOLVED, that the Audit, Integrity, and Compliance Committee of the Board of Visitors of Virginia Commonwealth University certifies that, to the best of each member's knowledge, (i) only public business matters lawfully exempted from open meeting requirements under this chapter were discussed in the closed meeting to which this certification resolution applies, and (ii) only such public business matters as were identified in the motion by which the closed session was convened were heard, discussed or considered by the Committee of the Board.

<u>Vote</u>	<u>Ayes</u>	<u>Nays</u>
Ms. Ellen Fitzsimmons, Vice Chair	X	
Dr. Dale Jones	X	
Mr. P2 Sandhu	X	
Dr. Kenneth Lipstock	X	
Mr. Todd Haymore, Rector	X	

All members in attendance responding affirmatively, the resolution of certification was unanimously adopted.

ADJOURNMENT

There being no further business Ms. Fitzsimmons, Vice Chair adjourned the meeting at 10:10 a.m.

VCU Board of Visitors

Audit, Integrity and Compliance Committee

May 8, 2025



For Action:

- **Audit, Integrity and Compliance Committee Charter and Meeting Planner**
- **Audit, Integrity and Compliance Department Charter**
- **Proposed FY2026 Internal Audit Workplan**
- **Proposed FY2026 Ethics and Compliance Program Initiatives**
- **Motion to approve the Minutes, Charters and Meeting Planner and Proposed FY2026 Ethics and Compliance Program Initiatives**

FY26 Proposed Audit Work Plan



Risk Based Audits and other Reviews

School of Medicine - Liver Institute
Development and Alumni Relations
Occupational Health and Safety
Procurement - Travel
OVPRI - Human Research Protection Program
Equity and Access Services



Internal Control Compliance Reviews

Public Safety and Security
School of Population Health
Honors College



Information Technology

Research Applications and Data Storage
Horizon VDI
Artificial Intelligence Governance Review
JAMF Pro - IT Control Review
Faculty Information System (SoM) - IT Control Review



Annual Engagements

Semi-Annual Follow-Ups
VCU Police - Evidentiary Property Inspection 1
VCU Police - Evidentiary Property Inspection 2
President Discretionary Funds Review

FY26 Proposed Ethics and Compliance Program Initiatives



Policy & Regulation

- Continue ensuring policy updates as required
- Address out of date policies (i.e. Faculty Affairs policies)
- Work with units on emerging policy issues (i.e. AI)
- Strengthen ICO's processes for systematically monitoring unit compliance w/federal & state regs



Investigations & Analytics

- Continue operating a best-in-class reporting and investigative function
- Provide investigative training and assistance to campus compliance partners
- Migrate to new case management tool
 - *Improved tracking & documentation, root cause analysis, compliance analytics*



Clery Act Compliance

- Implement Clery policy across VCU
- Redesign and publish Annual Security and Fire Safety Report (ASR)
- Continue training as warranted



Training & Communications

- Create new E&C training for onboarding employees
- Produce core collection of training content on E&C called "The Basics"
 - *Informed by FY24 Integrity Culture Survey*
 - *Will evolve with future culture survey findings*
- Harness new modalities (like podcasts) for content delivery, send to HRPs through *The Compass* eNewsletter

Auditor of Public Accounts

VCU FY2026 Audit Entrance Conference

Amy Stokes, Audit Manager

- Timing, objectives, scope
- Responsibilities during the audit process
- Other elements of the audit process



Committee Dashboard Measures

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

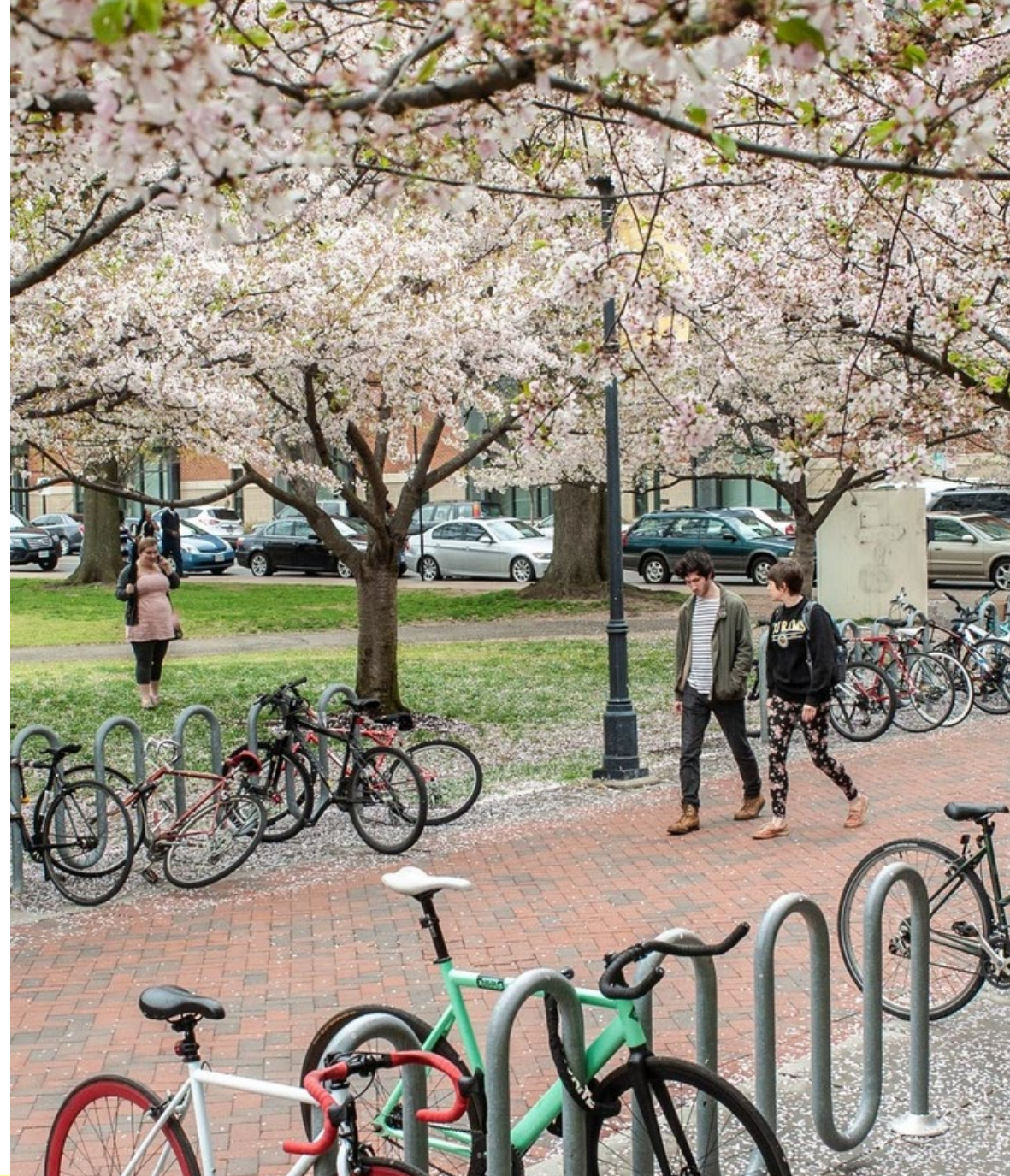
School of Education Internal Control and Compliance Review

- **Reviewed Selected Controls and Compliance Areas**
Reconciliations, purchases, PCards, fixed asset management
- **No Board Level Findings**

Ethics and Compliance Update

Audit, Integrity and Compliance Committee
May 8, 2025

Jason Block, CCEP, JD, PhD
Integrity and Compliance Office



Ethics and Compliance Update: Clery Act Update

Clery Geography Map

- Working with Space Management and the Capital Assets & Real Estate office to list properties VCU owns or controls, specific to Clery geography
- Creating a map to assist CSAs in identifying Clery locations and classifying crimes
 - Estimated publication: June, 2025

CSA Process

- Working with HR and other campus partners to accurately identify Campus Security Authorities (CSAs) based on law, guidance, and best practice
 - New process allows for automation, using the position or person to track designations, run reports, track notifications and training
- Exploring opportunities to add CSA designation to position descriptions, goals, and performance management

Clery Act Training

- Held 2-day Clery Foundations class in April (130+ employees with Clery responsibility)
- Provided an overview of all required areas of Clery, how they intersect across campus and with other laws
 - Title IX, Drug Free Schools and Communities Act, Stop Campus Hazing, Violence Against Women Act

Ethics and Compliance Update: Clery Act Update, cont'd.

Audit Trail

- Worked with VCU PD, Student Affairs, Title IX, Residence Life & Housing to develop audit trail process
- Transitioning the process to Smartsheet (electronic process with more capabilities, like data uploads, real-time dashboards and reports)
 - Records all reported Clery crimes based on crime classification and locations
- Developed/started reconciliation of reports received in 2024, ensuring proper classification and eliminating duplication

Report Mapping Process

- Researched reporting options and processes at VCU, how they flow from start to finish and how Clery is incorporated
- Targeted four areas to enhance VCU's Clery reporting:
 1. Streamlining Clery Incident Assessments by enhancing clarity, accountability and efficiency
 2. Developing a process to help the VCU Community navigate reporting options (Involves creating a central location for reports, training on report submittal, and what happens post-submittal)
 3. Updating Maxient (student record mgmt. system) to include unified reporting, enhanced collaboration, and improved data quality
 4. Optimizing data integrity, accountability, collaboration by defining roles and responsibilities, breaking down silos, and creating internal processes and controls

Enterprise Risk Management

Audit, Integrity and Compliance Committee

May 8, 2025

Tom Briggs
Chief Risk Officer
Finance and Administration

Mike Cimis
Associate Vice President
Occupational Health and Safety



Update

Two enterprise risks added:

- Decentralized functions and reporting
- Athletics and athlete compensation

One risk moved out of tolerance:

- Research funding

Six risks remain out of tolerance:

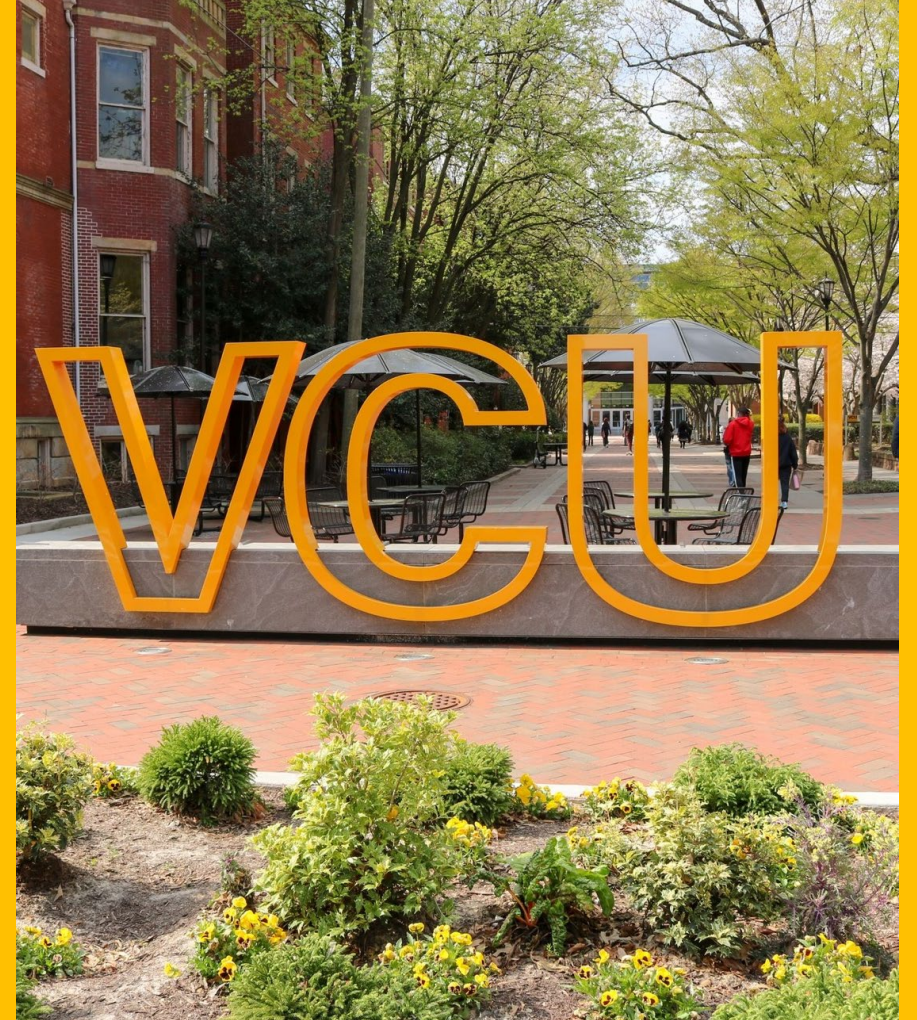
- Facilities and space
- Occupational safety and health
- Police - safety and security
- Emergency preparedness
- Clinical research administration process
- Institutional compliance and ethics

Next steps

1 Assessing VCU ERM Program

2 Risk rank accreditation, compliance and critical university reports; implement process improvements

3 Risk rank university business functions; implement process improvements and training



Questions? Discussion?

MAY 2025

Data Governance Updates

MICHAEL BOURGEOIS

ASSOCIATE VICE PROVOST

ALEX HENSON

CHIEF INFORMATION OFFICER



MAY 2025

Data Governance Updates

NOW: Where are we?

1 ➤ Data governance plan

✓ | Creation

WIP | Review

SPRING | Ratification

2 ➤ Data warehouse (HelioCampus)

✓ | Team assembly

✓ | Acquisition

WIP | Alignment

3 ➤ Plan execution

✓ | Steering committee

WIP | Tactical committee

MAY 2025

Data Governance Updates

LAST UPDATE:Pathing the data management and guidance strategy

TODAY:HelioCampus work summary and modules timeline

YEAR ONE MODULES

Includes data models for admissions, financial aid, course registrations, retention, and completions; related Tableau dashboards included in workbooks for admissions, financial aid, enrollment, retention and graduation, and completions

YEAR TWO MODULES

Academic Performance Management

YEAR THREE MODULES

Workforce Insights

Closed Session