



# VCU

## Board of Visitors

### AUDIT, INTEGRITY AND COMPLIANCE COMMITTEE

Thursday, April 23, 2026

The Honorable Benjamin Lambert, III Board Room  
1213 East Clay Street, Richmond, VA

### MEETING MINUTES

#### **COMMITTEE MEMBERS PRESENT**

Hon. Peter Farrell, *Chair*

Hon. Siobhan Dunnivant, M.D., *Vice Chair - virtual pursuant to Code Section 2.2-3708.3(B)(4) personal matter where the member was unable to attend the meeting due to a prior commitment - Richmond, VA*

Dr. Dale Jones

Dr. Kenneth Lipstock

Ms. Heidi Cook

Ms. Ellen Fitzsimmons, *Rector*

Mr. Steven DeLuca, *Vice Rector*

#### **OTHER BOARD MEMBERS PRESENT**

Mr. Randy Reynolds, Jr.

Mr. Neil Amin

#### **OTHERS PRESENT**

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

Dr. Michael Rao, *President*

Mr. Jacob Belue, *Associate University Counsel*

Staff from VCU

#### **CALL TO ORDER**

Mr. Peter Farrell, Chair, called the meeting to order at 9:15 a.m.

#### **ACTION ITEMS**

Mr. Farrell mentioned that the February 26, 2026 committee minutes were posted online and in BoardEffect and asked the committee if there were any questions or changes.

Hearing none, 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 and Compliance Services Department Charter, Internal Audit's FY2027 Work Plan and FY2027 Ethics and Compliance

Program Initiatives. Ms. Milton pointed out the minor changes to the meeting planner due to changes in the BOV schedule. She also noted that any change to the ACS Charter will be brought forward in September depending on possible changes in the VCU Health System regarding compliance. Ms. Milton reviewed with the Committee the Internal Audit Workplan and the risk assessment process that informs the plan. She also reviewed the elements of the Ethics and Compliance workplan for FY 2027. A question was raised whether enough resources were available to complete the audit plan and Ms. Milton stated that the department has enough resources at this time and includes a recently hired research auditor. In response to a question regarding whether the audit plan could include a review of Virginia Military Survivors and Dependents Education Program (VMSDEP), Ms. Milton responded that she will confer with others and report back at the June meeting regarding which office should take on that review. . On a motion duly made and seconded, the committee approved unanimously the February 26, 2026 meeting minutes and to recommend to the board the approval of the action items presented.

#### **Auditor of Public Accounts (APA) Entrance Conference for FY2027**

Amy Stokes, APA Audit Director, discussed the planning, timing and scope for the FY2027 annual financial audit. Ms. Stokes also discussed auditor and management responsibilities and audit report communications.

#### **Audit, Integrity and Compliance Committee Dashboard Measures**

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

#### **Report from the Chief Audit and Compliance Executive of Audit and Compliance Services**

Ms. Suzanne Milton reported the results of three recent audits involving Strategic Enrollment Management – School of Public Health – Equity and Access Services, two with no board level findings and one with no findings. Status updates for the FY26 audit workplan were included in the BOV materials.

#### **Enterprise Risk Management Update**

Tom Briggs, Chief Risk Officer, Enterprise Risk Management, Finance and Administration provided an update on the Enterprise Risk Management program, including particularly the projects of the Risk Reduction Committee.

#### **Data Governance Update**

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

#### **CLOSED SESSION**

Dr. Dale Jones moved that the Audit, Integrity and Compliance Committee of the Board of Visitors of Virginia Commonwealth University convene in a closed session under Section 2.2-3711 (A)(7) and (8) for the discussion of actual or probable litigation and of matters requiring the provision of legal advice by counsel, relating to an update on potential and current litigation in state and federal courts and other legal matters relating to pending investigations

**RETURN TO OPEN SESSION AND CERTIFICATION**

Following the closed session, the public was invited to return to the meeting. Mr. Farrell called the meeting to order. He reminded members that the personnel matters discussed in closed session are confidential, sharing confidential personnel information may give rise to a violation of privacy claim against the university, and similarly, the board should treat all other matters discussed in closed session as confidential. 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.

<b><u>Vote</u></b>	<b><u>Ayes</u></b>	<b><u>Nays</u></b>
Mr. Peter Farrell, <i>Chair</i>	X	
Ms. Siobhan Dunnivant, <i>Vice-Chair</i>	X	
Ms. Heidi Cook	X	
Dr. Dale Jones	X	
Dr. Kenneth Lipstock	X	
Ms. Ellen Fitzsimmons, <i>Rector</i>	X	

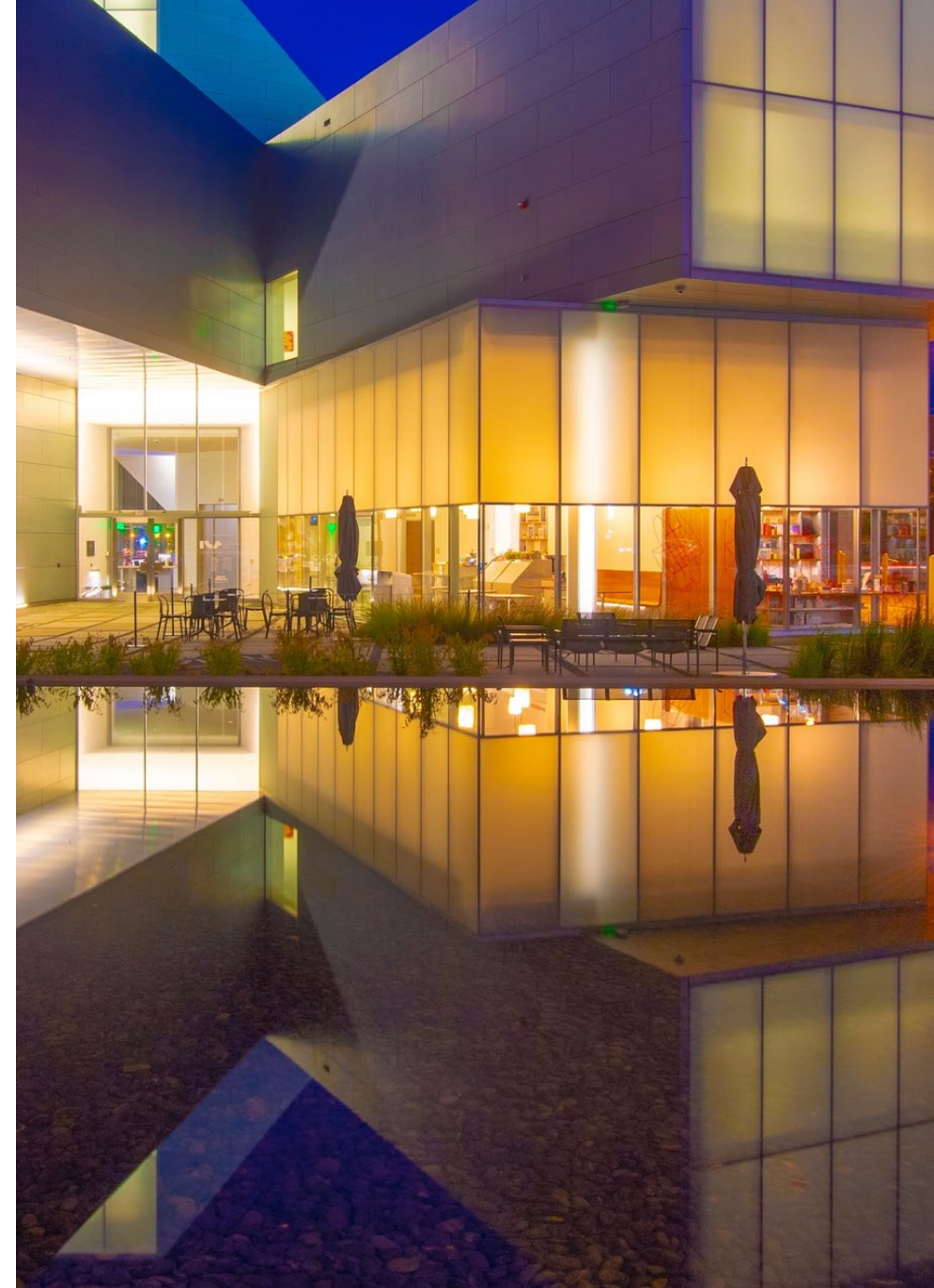
Mr. DeLuca was not present for the vote. All members present and responding affirmatively, the resolution of certification was adopted.

**ADJOURNMENT**

There being no further business, Mr. Farrell adjourned the meeting at 10:30 a.m.

# VCU Board of Visitors

Audit, Integrity and Compliance Committee  
April 23, 2026



# For Action:

- Audit, Integrity and Compliance Committee Charter and Meeting Planner
- Audit, Integrity and Compliance Department Charter
- Proposed FY2027 Internal Audit Workplan
- Proposed FY2027 Ethics and Compliance Program Initiatives
- Motion to approve the Minutes, Charters and Meeting Planner and Proposed FY2027 Ethics and Compliance Program Initiatives

# FY27 Proposed Audit Work Plan



## Risk Based Audit and other Reviews

Athletics - Development  
Occupational Health and Safety -  
Insurance and Fire Safety  
Controller's Office  
OVPRI - TBD  
Human Resources - TBD  
Facilities Operations  
College of Engineering  
School of Medicine - Liver institute  
College of Humanities and Sciences



## Internal Control and Compliance Reviews

VP for Health Sciences  
Technology Services  
VP for Enterprise Marketing and  
Communication



## Information Technology

Account Provisioning and  
Deprovisioning  
Development and Alumni Relations IT  
Review  
Software-as-a-Service Application  
Review  
Tableau - IT Control Review  
Slate CRM (Prospective Student  
System) - 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

**Integrity and Compliance Office**

# **FY2027 WORK PLAN**

# PROGRAM STRUCTURE & RESOURCES

## EC TEAM

- Team cross-trained and integrated
- Ongoing career development in functional areas within ICO (EC, Training and Comms)
- Privacy Training (Block) [Research Compliance Training completed in 2025.]
- Research Compliance Training (Milton)
- Monitoring and Reporting Training (LaMorey)

## EC PARTNERS

- Compliance Steering Committee  
Reframing: refine membership, focus on monitoring, ensure one-page updates
- Development of Clery Governance Structure

# CULTURE

## EC TEAM

- Expand programming around culture of care and its intersection with Ethics and Compliance (e.g. psychological safety and more)
- ICO brand alignment and publication refresh

## EC PARTNERS

- Continued partnership with other units to refine Clery processes
- Partnership with HR to implement an internal Ethical Culture survey
- Work with the VCU Police Department to reform the Campus Crime Log to better fit the needs of the campus and Clery reporting

# POLICIES

## EC TEAM

- Implement and assess the use of the new Code of Conduct
- Revamp the communications around the yearly COI campaign

## EC PARTNERS

- Continued partnership with HR and other COI Administrators to enhance familiarity and knowledge of COI program, policy and software
- Continued partnership with OVPRI and VCUHS compliance to ensure alignment and collaboration

# INVESTIGATIONS & ACCOUNTABILITY

## EC TEAM

- Revise and refine investigative protocols
- Revise and refine SOPs for using the ICO case management system
- Develop dashboards within the CMS to make data accessible to stakeholders
- Leverage data now available from system for analysis, trend & predictive information

## EC PARTNERS

- Facilitate Investigator Training for partners on campus who do investigations

# TRAINING AND COMMUNICATIONS

## EC TEAM

- Expand programming around culture of care and psychological safety
- Expand micro-learnings and digital education
- Website modernization
- Increase social media presence
- ICO brand alignment and publication refresh

# RISK ASSESSMENT

## EC TEAM

- Identify potential policy/compliance gaps as needed

## EC PARTNERS

- Compliance Steering Committee Reframing
- Continued partnership with other units to refine Clery processes
- Continued partnership with ERM to complete refresh and training of ERM team and when needed otherwise

# Auditor of Public Accounts







VCU FY2027 Audit Entrance Conference

## Amy Stokes, Director, Reporting and Standards

- 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

# Strategic Enrollment Management

## **Purpose:**

To determine whether documented strategic enrollment strategies were in place and monitored; there were metrics in place to help monitor progress on enrollment strategies; and there were adequate processes in place to prevent enrollment of ghost students

## **Scope:**

- 2024 Strategic Enrollment Management Plan
- Monitoring of Strategies
- Emerging challenges such as the enrollment cliff and ghost students

**No Board Level Findings**

# School of Public Health Internal Control and Compliance Review

- Reviewed Selected Controls and Compliance Areas  
Reconciliations, purchases, PCards, fixed asset management

**No Board Level Findings**

# Equity and Access Services

## **Purpose:**

To determine whether EAS observed adequate procedures to comply with federal and state regulations and with university policies; and Title IX, ADA and Minors on Campus documentation in their systems of record were sufficient to support case resolutions.

## **Scope:**

Our scope covered calendar year 2025 and included a focus on Title IX training, accessibility, and case management.

**No Findings**



# Enterprise Risk Management Risk Reduction Project Overview



**WE ARE THE UNCOMMON.**

# Risk reduction project overview

- **Purpose:**

- Identify strategic and operational risks that have the potential to significantly impact the achievement of VCU's mission and goals
- Identify and implement process improvements in the areas of communications, human resources, finance and information technology services

- **Expected outcomes:**

- Align lines of authority and responsibility
- Manage or eliminate shadow systems
- Reduce compliance issues/audit findings

# Current priorities

The following priorities have been identified for FY 2026:

- **Finance:**

- Implement governance framework and ownership structure for Anaplan
- Complete centralized fixed assets inventory

- **Technology Services:**

- Implement application governance framework and enterprise-wide standards for application management
- Implement new server management and support model, discontinuing “housed” servers and moving to “managed hosting”

- **Human Resources/Academic Affairs:**

- Implement risk mitigation goal for all MBU leaders
- Develop consistent process, policies and oversight for faculty and staff recruitment
- Improve central oversight of hiring in the areas of communications, human resources and finance

- **Communications:**

- Begin implementing a plan -- based on feedback contained in our third-party review -- to better connect EMC and unit-level communications and marketing

# Next Steps

**The following priorities have been identified for FY 2027:**

- Complete administrative infrastructure for oversight of HR, Finance, Tech Services and EMC
- Develop and implement a model that aligns authority and responsibility for administrative services between the Provost's Office, Health Sciences, and SVP Finance and Administration

APRIL 2026

# Data Governance Updates

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**MICHAEL BOURGEOIS**

ASSOCIATE VICE PROVOST



**ALEX HENSON**

CHIEF INFORMATION OFFICER

APRIL 2026

# Data Governance Updates



## Current Status

**1**  Data governance plan 

✓ | Mandate

WIP | Steering committee

WIP | Tactical committee

**2**  Data warehouse (HelioCampus) 

✓ | Team assembly

✓ | Procurement

WIP | Phase 1

# Data Warehouse Progress

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## PHASE 1: Student Lifecycle (AY 25-26)

Data models and Tableau workbooks covering admissions, financial aid, course registration, enrollment, retention, graduation, and completions across the student lifecycle.

## PHASE 2: Academic Performance Management (AY 26-27)

Data models and Tableau workbooks supporting course demand, instructional capacity, student credit hours, and contribution margin analysis across courses, programs, and departments.

## PHASE 3: Workforce Insights (AY 27-28)

Data models and Tableau workbooks supporting employee activity, compensation, turnover, and workforce diversity analysis.

# Closed Session