

LIBERTY UNIVERSITY



ETHICS & COMPLIANCE

ANNUAL COMPLIANCE REPORT

2026

Presented to the Liberty University Board of Trustees

TABLE OF CONTENTS

- [Introduction](#) 3
 - [New Senior Vice President and Chief Compliance Officer](#) 3
 - [A Word From Our Senior Vice President](#) 3
- [Ethics & Compliance Division](#) 4
- [Compliance Council](#) 4
 - [Guiding Principles for Member Engagement](#) 5
- [Compliance Program Development](#) 5
 - [Review 1: Digital Accessibility](#) 6
 - [Review 2: Movie Licensing](#) 6
 - [Review 3: Data Governance](#) 7
 - [Review 4: Youth Protection Policy](#) 8
- [Ethics & Compliance Training](#) 8
 - [Campus Security Authority \(CSA\) Training](#) 9
 - [Responsible Employee \(RE\) Training](#) 9
 - [Family Educational Rights and Privacy Act \(FERPA\) Training](#) 9
- [Ethics & Compliance Annual Reporting](#) 9
 - [Annual Security Report](#) 9
 - [Drug and Alcohol Abuse Prevention Program Report](#) 10
 - [Hazing Prevention and Education](#) 10
- [Road Map for 2026](#) 11
 - [Introducing the Compliance Maturity Model](#) 11
 - [Standardized Review and Lifecycle](#) 13
- [Communication Plan](#) 13
- [Conclusion](#) 13

Introduction

We saw remarkable growth and progress at Liberty University in 2025. Throughout the year, the university remained committed to an environment focused on compliance and institutional integrity. This annual report highlights key accomplishments from the past year, summarizes enhancements to our compliance framework, and outlines ongoing projects that support the compliance goals of the university. Together, these accomplishments demonstrate Liberty University's continued dedication to fostering a culture of compliance across all areas of the institution.

New Senior Vice President and Chief Compliance Officer



This year we welcomed **Jeff Hurlbert** as Liberty's new senior vice president and chief compliance officer. Jeff came to Liberty after 2 years as the chief security officer for a \$150B Fortune 200 semiconductor manufacturing company. Prior to his corporate role, Jeff served 32 years in the United States Air Force, retiring as a 1-star general.

Jeff's military career focused primarily on federal law enforcement, compliance, investigations, security, intelligence, and counterintelligence. He served in the Pacific, Europe, Africa, the Far East, and various assignments in the U.S., including 3.5 years at the White House, as well as a tour as the deputy inspector general (deputy chief compliance and risk officer) for the Department of the Air Force. In his final military position, Jeff served as the commandant (chancellor) of the National War College at Fort McNair in Washington, D.C.

Jeff holds a Bachelor of Business Administration (Accountancy) from the University of Notre Dame, South Bend, Ind., where he was a distinguished graduate of the Air Force Reserve Officer Training Corps. He earned a Master of Science in Business Organizational Management from the University of La Verne in La Verne, Calif. He was a distinguished graduate of the Air Force Special Investigations Academy and a distinguished graduate of Air Force Squadron Officer School. He holds a postgraduate certificate in strategic intelligence from the Joint Military Intelligence College (now National Intelligence University), Washington, D.C. Jeff was also awarded a Master of Arts in National Security and Strategic Studies (with distinction) from the U.S. Naval War College in Newport, R.I.

A Word From Our Senior Vice President

My family and I are humbled and grateful to be new members of the Liberty University team. As I reflect on the path God mapped out in my professional journey, I'm often reminded of Esther 4:14. I could not have planned it, nor would I have predicted it; yet, as I consider the opportunities, growth, and responsibilities the Lord placed before me through the years, it is clear that He was preparing me — and our family — “for such a time as this.”

At Liberty University, the Ethics & Compliance team is dedicated to **safeguarding our institutional integrity**. Across our functions — including Internal Audit, Equal Rights and Title IX, Clery Act Compliance, Government and Community Relations, Institutional Compliance, and Education — we recognize that our collective work is essential to advancing Liberty's mission to *Train Champions for Christ*.

Our efforts are grounded in the seven elements of an effective compliance and ethics program, as first outlined by the federal government in 1991. These pillars — Policies and Procedures; Oversight; Governance; Training and Awareness; Reporting, Auditing and Monitoring; Enforcement; and Response and Prevention — provide the foundation for our work. We strive to

carry out these responsibilities “with all our hearts, as working for the Lord, not for human masters ... for it is the Lord Christ we are serving” (Colossians 3:23–24).

This annual report highlights the progress we have made across these seven elements and looks ahead to future priorities and opportunities.

As I close, I want to express my deepest gratitude to the many individuals who make this mission possible. Ethics & Compliance facilitates a culture of ethical behavior and compliance, but it is the actions of Liberty’s employees – across every department and function – that bring that culture to life. None of what you will see in this report would be possible without the partnership, dedication, and support of colleagues throughout Flames Nation. I am especially grateful to our LU compliance partners, vice presidents, the President’s Council, the university president, the university chancellor, and the Board of Trustees Audit Committee for their continued leadership, time, and commitment in helping us build a strong, effective, and Christ-centered ethics and compliance program. **Go Flames!**








Jeff H. Hurlbert
Senior Vice President
Ethics & Compliance

Ethics & Compliance Division

As with any new organizational structure, implementation offers valuable insights into what works well and where refinements are needed. Liberty continued to build and develop the university’s compliance infrastructure through the formal establishment of the Ethics & Compliance Division. This change was implemented to clearly define roles and responsibilities while maintaining a singular focus on excellence in compliance. While each office within the division continues to fulfill its previous responsibilities, the new structure provides clearer identification of functional areas.

The offices now aligned within the division include:

-  **Office of Clery Act Oversight**, led by *Andrew Smith*
-  **Office of Equal Rights & Title IX**, led by *Kasey Smith*
-  **Office of Government & Community Relations**, led by *Kenny Craig*
-  **Office of Institutional Compliance and Office of Education**, led by *Joanna Roush*
-  **Office of Internal Audit**, led by *Jessica Best*

Now operating as six interconnected offices, Ethics & Compliance is better positioned to ensure appropriate oversight, streamlined workflow, and clear accountability of compliance processes.

Compliance Council

The Compliance Council maintained its established quarterly meeting cadence during the 2025 calendar year, convening in March, May, September, and December. Each meeting emphasized federal regulatory developments and included focused awareness on our Core Areas of Focus. Topics covered during the year included data governance, NCAA and House Settlement, state authorizations and approvals, data privacy considerations, and the intersections of FERPA and HIPAA privacy requirements.

CORE AREAS OF FOCUS



Over the last four quarters, council members attended a total of 168 hours of focused training and awareness.

Additionally, the Compliance Council Members Guide was created and presented to council members. This new document explains member responsibilities, appropriate pathways for escalation and reporting, and the Compliance Council’s critical role in advancing the university’s compliance environment. Its purpose is to articulate and demonstrate the cohesion and focus that are central to the Compliance Council’s success and support the overarching goal of creating a culture of compliance.

Guiding Principles for Member Engagement

- **Demonstrate Integrity** – Uphold the highest standards of ethical conduct and lead by example in promoting compliance and accountability.
- **Engage Actively** – Attend meetings regularly and participate constructively; contribute insights, feedback, and expertise from your area.
- **Communicate Transparently** – Share relevant compliance concerns and updates openly to foster a culture of trust and collaboration across departments.

- **Stay Informed** – Keep current with applicable laws, regulations, and policies, and be engaged in updates and training provided for awareness.
- **Support Institutional Goals** – Align compliance efforts with the university’s mission and strategic priorities. Promote a pan-institutional approach to compliance and risk management.

Compliance Program Development



The Office of Institutional Compliance continued to partner closely with departments across the university to support our Core Areas of Focus and to assess topics presenting concerns or opportunities for growth. Each review contributed to measurable progress in strengthening the university’s overall compliance position and helped sustain forward momentum toward higher standards. These efforts underscore the significant outcomes that can be achieved through collaboration, teamwork, and a unified commitment to advancing compliance across the institution.

Review 1: Digital Accessibility

In alignment with the updated standards issued by the U.S. Department of Justice, the Americans with Disabilities Act (ADA) now requires that institutions ensure digital content meets the standards outlined in Web Content Accessibility Guidelines (WCAG) 2.1, Level AA. In prior years, these standards served as recommendations; however, they have now been mandated for public institutions. While the current update applies specifically to public entities, Liberty University proactively initiated compliance efforts in anticipation of expected future requirements for private institutions as well as to serve our community better in this space.

To advance this initiative, the university convened a dedicated subcommittee focused exclusively on digital accessibility needs. The subcommittee consisted of subject matter experts in the areas of:

- Academic Content
- Apex/RAFT Forms
- Athletics
- Documents
- Enrollment Management
- Live Events
- Social Media
- Third Party Products
- Video & Audio
- Websites & Applications

The expertise of these key players guided the development of actionable strategies and resources to support university-wide implementation.

In collaboration with Liberty's Center for Academic Development (CAD), the subcommittee is developing a comprehensive digital accessibility resource scheduled for launch in April 2026. Delivered in a course format, this resource will provide detailed guidance on digital accessibility principles and practical methods for integrating WCAG 2.1 Level AA requirements into the university's digital platforms and online presence. Once this resource is launched, it will serve as the university's standard for auditing and improving our digital environments.

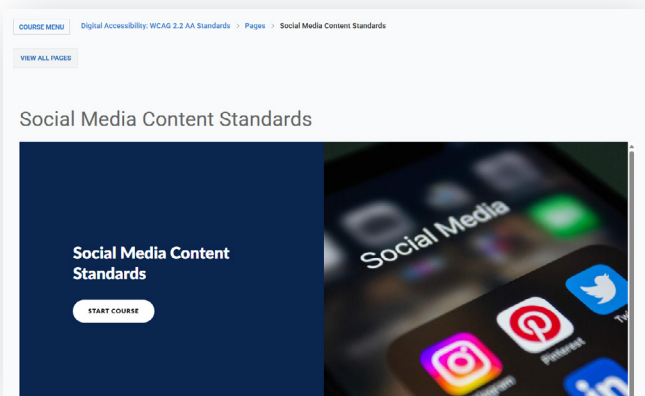
Key Accomplishments:

- **Identified key WCAG 2.1 Level AA compliance requirements** relevant to Liberty University's digital environments
- **Developed implementation recommendations** informed by subject matter experts across multiple departments
- **Created a digital accessibility resource course (release scheduled for April 2026)** in partnership with CAD, designed to support faculty and staff in meeting ADA and WCAG standards
- **Positioned Liberty University ahead of anticipated federal requirements** for private institutions by initiating early compliance efforts

Review 2: Movie Licensing

Movies play a meaningful role in enriching student life and supporting a vibrant campus community. However, as public film showings are subject to federal copyright regulations, the university identified an opportunity to ensure compliance standards related to how film events are planned and approved.

The Office of Institutional Compliance collaborated with the Office of Community Life and the Office of Events Management to review current practices and establish a compliance framework for campus film screenings. As a result of this joint effort, the official Movie Licensing Policy was drafted, approved, and published. This policy has been fully integrated into the Events Management workflow, creating a clear point of accountability and ensuring that all movie showings meet federal licensing requirements.



Events Management will also incorporate the new policy into its fall orientation for all registered student clubs and organizations. This proactive step increases awareness, reduces institutional risk, and helps prevent significant financial penalties associated with non-compliant public showings.

Key Accomplishments:

- **Reduced institutional risk** by establishing clear guidelines to prevent costly copyright violations
- **Developed and implemented the official Movie Licensing Policy** to ensure compliance with federal copyright regulations
- **Integrated licensing requirements into the Events Management process**, establishing consistent oversight and approval mechanisms
- **Expanded compliance education** by adding policy training to student club orientation sessions

Review 3: Data Governance

As part of further advancing the university’s compliance posture, the Office of Institutional Compliance initiated a comprehensive data governance project focused on establishing a unified and authoritative reference for all applicable data privacy laws and regulatory obligations. Early assessments revealed the need for a single, source-of-truth document that consolidates federal, state, and international data privacy requirements, including associated standards for data retention and data deletion. In collaboration with the Office of Legal Affairs, Institutional Compliance developed a centralized working matrix that provides clear visibility of all governing laws applicable to Liberty University.

The university identified 42 total laws and regulatory frameworks, encompassing:

- **14 primary federal and state policies**, including FERPA, HIPAA, GLBA, FAFSA/FSA requirements, Title VII/ADA/GINA retention rules, ADEA, FLSA, Virginia employment privacy statutes, and the Video Privacy Protection Act

- **5 secondary federal policies**, including FCRA, PPRRA, ECPA, CFAA, and COPPA
- **20 state data privacy laws**, such as the CCPA (California), CPA (Colorado), CTDPA (Connecticut), DPDP (Delaware), FDBR (Florida), INCDPA (Indiana), ICDPA (Iowa), KCDPA (Kentucky), MODPA (Maryland), MCDPA (Minnesota and Montana), NDPA (Nebraska), NHEP (New Hampshire), NJDPA (New Jersey), OCPA (Oregon), RIDPA (Rhode Island), TIPA (Tennessee), TDPSA (Texas), UCPA (Utah), and VCDPA (Virginia)
- **3 international frameworks**, including the EU’s GDPR, Canada’s PIPEDA, and the Australian Privacy Principles (APP)

 <p>Federal</p>	<ul style="list-style-type: none"> • FERPA • HIPAA • GLBA • HEA • COPPA • TITLE VII 	<ul style="list-style-type: none"> • ADA • ADEA • FLSA • IRS Rules • TITLE IX • DPPA 	<ul style="list-style-type: none"> • ECPA • FCRA • TCPA • VPPA
 <p>Industry Standards</p>	<ul style="list-style-type: none"> • PCI DSS — Payment Card Industry Data Security Standard • National Institute of Standards and Technology 	<ul style="list-style-type: none"> • Center for Internet Security 	
 <p>Liberty Policies</p>	<ul style="list-style-type: none"> • Privacy Policy • GDPR Policy • Data Storage Policy • Acceptable Use Policy • Data Retention Policies • AI Usage Guidance 	<ul style="list-style-type: none"> • Code of Business Conduct • LU trade secrets • Handbooks 	
 <p>State</p>	<ul style="list-style-type: none"> • Student Records and Personal info • Release of Employees’ personal info • Virginia Tax Code 	<ul style="list-style-type: none"> • Consumer Data Privacy Statutes • Breach Notification Rules 	
 <p>International</p>	<ul style="list-style-type: none"> • General Data Protection Regulation (GDPR) (EEA/UK) 	<ul style="list-style-type: none"> • Personal Information and Electronic Act (PIPEDA) (Canada) 	
 <p>Contractual Obligations</p>	<ul style="list-style-type: none"> • Third Party Data • Sponsored Research Agreements 		

Key Accomplishments:

- **Developed a comprehensive data governance matrix** identifying 42 applicable laws and regulatory standards, providing a consolidated reference for privacy, retention, and data handling requirements
- **Improved institutional readiness for audits and assessments** by organizing complex regulatory obligations into a structured format that supports decision making and risk mitigation
- **Enabled more effective data governance planning** through clearer visibility into overlapping requirements across federal, state, and international requirements

Additionally, a biannual review of data privacy laws has been established and will be completed by the Office of Institutional Compliance. These reviews will be used as university policy is developed around data privacy and governance.

Review 4: Youth Protection Policy

The Office of Institutional Compliance identified youth protection programs and policies as critical components of a robust institutional compliance structure. In collaboration with the Office of Clery Act Oversight and the Office of Legal Affairs, the Office of Institutional Compliance conducted a campuswide landscape review to assess current practices and determine areas requiring further development to ensure appropriate safeguards are in place for minors who visit Liberty University.

Liberty's campus hosts many summer programs involving hundreds of minors each year. Ensuring a safe and positive experience for these participants is essential to the reputation of Liberty University. The initial focus for improvement was centered on enhancing training for individuals working or volunteering during the 2025 summer camp season. This training was delivered through the existing Campus Security Authority (CSA) framework and served as the foundation for broader program development. As a result of this initiative, an additional 139 individuals were trained in 2025.

The Office of Institutional Compliance then began drafting a formal Youth Protection Policy to guide the ongoing build-out of the program. The draft policy underwent multiple iterations with substantial input from the Office of Legal Affairs and the Office of Clery Act Oversight. To ensure a fully collaborative and well-informed approach, the draft was also shared with key stakeholders, including Human Resources, Events Management, Risk Management, and the Office of Security & Public Safety.

Following a comprehensive review, the President's Council approved the Youth Protection Policy and endorsed the Office of Clery Act Oversight as the responsible owner of the policy and program. This designation provides clear leadership and enables continued development of the program's infrastructure ahead of the 2026 summer event season, with full implementation targeted for summer 2027.

Key Accomplishments:

- **Conducted a university-wide landscape review** of existing youth-related policies to identify gaps and development needs
- **Launched enhanced training for summer camp personnel** through the CSA framework for the 2025 summer season
- **Drafted and refined an official Youth Protection Policy** incorporating legal, compliance, and valuable stakeholders
- **Established a phased implementation plan** with infrastructure development slated for 2026 and full program implementation by summer 2027

Ethics & Compliance Training

Ethics & Compliance continued to advance Liberty University's commitment to integrity through the delivery of required compliance training. These training courses and events are designed to ensure that the Liberty community is equipped with the knowledge necessary to meet institutional expectations and adhere to applicable regulatory requirements. These training efforts play a

vital role in promoting consistent standards, reducing institutional risk, and supporting a safe and accountable environment for the Liberty University community.

Campus Security Authority (CSA) Training

CSA training is required under the Clery Act and equips designated employees with the knowledge necessary to recognize and report Clery-reportable crimes. Throughout the year, CSA roles were reviewed and updated to ensure accuracy, resulting in the assignment of training to individuals with reporting responsibilities

Campus Security
Authorities identified:

1,250

CSA Training
Completion Rate:

93.9%

Responsible Employee (RE) Training

Responsible Employee training reinforces employees' responsibilities to report disclosures of sexual misconduct to the appropriate institutional officials. While not specifically required by regulation, this training represents an important institutional practice that helps maintain a consistent, responsive, and supportive campus reporting culture.

Title IX Responsible
Employee trainees:

5,854

Title IX Responsible Employee
Training Completion Rate:

98.4%

Family Educational Rights and Privacy Act (FERPA) Training

FERPA training is required for all faculty, staff, and student workers who have access to student education records. This training ensures that university personnel understand the legal obligations for protecting student information, managing education records, and granting appropriate access. Although the Registrar's Office is responsible for administering and maintaining FERPA training, its significance to the university's broader compliance program warrants its inclusion among the core compliance training programs.

EMPLOYEE FERPA TRAINING

Employees
Eligible:

7,876

FERPA Training
Completion Rate:

97.3%

Ethics & Compliance Annual Reporting

Annual Security Report

In accordance with the Jeanne Clery Campus Safety Act, the Office of Clery Act Oversight published Liberty University's Annual Security Report (ASR) on Sept. 27, 2025. The report was reissued on Oct. 4, 2025, to incorporate minor corrections to the crime statistics section, including clarifications related to hate crime reporting for 2023 and 2024. The 2025 ASR is available at any time through the university's Consumer Information webpage. Individuals may also request a printed copy at no cost by emailing clery@liberty.edu.

Drug and Alcohol Abuse Prevention Program Report

Liberty University's annual Drug and Alcohol Abuse Prevention Program (DAAPP) Report was published and distributed on Sept. 27, 2025. The DAAPP is mandated under the Drug-Free Schools and Communities Act (DFSCA), which requires institutions of higher education to implement effective programs and policies designed to prevent the unlawful manufacture, possession, use, or distribution of illicit drugs and alcohol by students and employees.

The university's DAAPP Report is a collaborative effort between the Office of Clery Act Oversight and the Office of Community Life. The report provides the institution's standards of conduct, applicable legal sanctions under federal, state, and local laws, health risks associated with drug and alcohol misuse, and available university and community resources for education, counseling, and treatment. It also includes a description of prevention initiatives, disciplinary consequences for violations, and an assessment of program effectiveness.

By publishing the annual DAAPP Report, Liberty University affirms its commitment to maintaining a safe, healthy, and legally compliant campus environment, while supporting the well-being and success of all students and employees. Both the Annual Security Report and the DAAPP were distributed to over 180,000 individuals in the Liberty community. The DAAPP is actively distributed to all students at the beginning of each academic term through faculty announcements and to all employees during new employee orientation.

Hazing Prevention and Education

On December 23, 2024, the Stop Campus Hazing Act (SCHA) was signed into law, with implementation requirements beginning January 1, 2025. The SCHA introduced two primary compliance requirements. First, hazing was added as a reportable offense under the Clery Act, requiring institutions to count and disclose hazing incidents in their annual crime statistics. Second, institutions are required to develop and publish a Campus Hazing Transparency Report detailing hazing determinations involving student organizations.

The SCHA strengthens federal expectations for transparency, prevention, and institutional accountability by requiring enhanced hazing reporting, policy disclosure, and prevention education as part of an institution's broader campus safety and compliance framework. Consistent with these requirements, the Office of Clery Act Oversight developed a hazing policy to accurately capture the process for counting and reporting hazing incidents reported to Campus Security Authorities (CSAs). The Office of Community Life is responsible for hazing investigation, enforcement, and campuswide training initiatives.

The Campus Hazing Transparency Report is available at cm.maxient.com/chtr.php?LibertyUniv. These efforts reflect Liberty University's ongoing commitment to fostering a safe and respectful campus environment while meeting evolving federal and state compliance obligations related to hazing prevention and reporting.



Road Map for 2026

Since the beginning of Liberty University's compliance program, its foundational framework has been the Seven Elements of an Effective Compliance Program (Seven Elements) as initially articulated by the U.S. Department of Justice in 1991. In its Charter for Ethics & Compliance, the university established its program with the clear objective of aligning with these elements to strengthen institutional integrity and reduce compliance risk across the organization.

The Seven Elements have consistently informed the design, implementation, and improvement of Liberty's compliance program, but as the university looks ahead to 2026, these principles are becoming actualized as we are creating formalized standards for Core Area of Focus reviews and evaluations, as well as developing a comprehensive Maturity Model (see below) that will support both Ethics & Compliance and the broader university community.

These efforts reflect Liberty's ongoing commitment to building a durable, transparent, and effective compliance infrastructure that promotes accountability and fosters a culture of ethical conduct and compliance.

Introducing the Compliance Maturity Model

Over the past few months, Ethics & Compliance has developed a Maturity Model that reflects and seeks to measure the fundamental principles of the Seven Elements. This model has been developed to ensure targeted review, assessment, and analysis occur regularly so that areas needing growth and development are clearly identified and Ethics & Compliance can better understand the goals toward which it is working.


The Maturity Model will be used first as a self-assessment tool for all offices within Ethics & Compliance, but it will also serve as the framework for reviewing and supporting the Core Areas of Focus.

The model on the next page outlines how Liberty University applies the Seven Elements to evaluate the maturity of compliance activities and guide strategic growth of

the compliance program. This structured approach helps ensure that compliance operations not only meet regulatory expectations but also support Liberty's mission through proactive risk mitigation, clear accountability, and a commitment to ethical conduct.



COMPLIANCE MATURITY MODEL

	Ad Hoc Procedures are usually informal, incomplete, and inconsistently applied.	Repeatable Compliance processes are documented but manual and inconsistent.	Defined Compliance controls and procedures are standardized and consistently applied across the organization.	Managed Compliance procedures are integrated into business processes, and periodic reviews are conducted to assess effectiveness.	Optimized Compliance procedures and controls are continuously improved, automated, and aligned with strategic goals.
7 ELEMENTS	Policies and Procedures Procedures are usually informal, incomplete, and inconsistently applied.	Compliance processes are documented but manual and inconsistent.	Compliance controls and procedures are standardized and consistently applied across the organization.	Compliance procedures are integrated into business processes, and periodic reviews are conducted to assess effectiveness.	Compliance procedures and controls are continuously improved, automated, and aligned with strategic goals.
	Oversight Procedures are subject to informal ownership and are addressed inconsistently.	Some areas have assigned owners.	All areas have designated owners with defined roles.	Owners are trained and held accountable.	Ownership is tied to performance metrics and compliance goals.
	Governance Responses to compliance issues are ad hoc and reactive.	Known compliance issues are tracked, but processes are manual and lack consistency.	Compliance updates and issues are systematically linked to policy revisions and implementation efforts.	Proactive alerts are in place; ownership is reassigned as needed to ensure accountability.	Predictive tracking enables preemptive planning and policy updates; compliance is continuously monitored and integrated into strategic decision-making.
	Training and Awareness Awareness is promoted via word-of-mouth or onboarding.	Training is limited and untracked.	Training and awareness programs are targeted.	Communications take place on a timely basis, and engagement is tracked.	Engagement is ongoing; effectiveness is measured via surveys and feedback.
	Reporting, Auditing, and Monitoring Reviews happen only when problems arise.	Review schedules are not consistent.	A regular review cycle is documented and monitored.	Reviews are aligned with risk and regulatory changes.	Automated tracking and dashboard reporting are in place.
	Enforcement Enforcement is tracked informally via paper or email, with inconsistent follow-through.	Partial digital tracking is in place, but lacks integration and consistency.	A digital system is used to track and address non-compliance. Standardized procedures are in place.	Enforcement processes are integrated with HR and other systems, enabling coordinated response and accountability.	Enforcement is fully automated with version control, audit trails, and comprehensive reporting capabilities.
	Response and Prevention Responses are inconsistent and reactive.	Updates and responses occur but are limited in scope and reach.	Oversight is centralized; processes for handling reports and corrective actions are documented.	Timely and targeted oversight is in place and includes stakeholder engagement and legal review.	Real-time updates and integration into enterprise systems ensure proactive and transparent response management.

Standardized Review and Life Cycle

While the Office of Institutional Compliance has been successful in completing several important compliance projects, it has become clear that a more systematic approach to reviewing compliance areas is needed. Therefore, during 2026, the Office of Institutional Compliance will begin developing a structured review process for all Core Areas of Focus. This process will incorporate the Maturity Model and establish four reviews each year, allowing every Core Area of Focus to be evaluated once every three years.

The purpose of these reviews is not to serve as internal audits. Rather, the goal is to provide compliance function owners with an opportunity to assess their programs through the Maturity Model, identify areas of weakness, and receive support for growth and development from Institutional Compliance. This approach will help strengthen development within individual compliance areas and advance the overall compliance program.

The Core Areas of Focus scheduled for review in 2026 are Title IX, Environmental Health & Safety, Employee Management (Volunteer Program), and IT Security. Leadership from each area will have the opportunity to assess their programs using the established Maturity Model, identify areas of concern or desired growth, and develop an action plan with support from the Office of Institutional Compliance.

Communication Plan

Awareness is one of the most crucial factors in building a strong culture of compliance. With that in mind, Ethics & Compliance remains committed to providing the Liberty community with resources on key compliance topics, federal updates, and other relevant information. Throughout 2025, the Office of Government & Community Relations sent regular weekly emails highlighting important updates from federal, state, and local governments. In 2026, Ethics & Compliance plans to expand communication to the university community by more consistently addressing compliance topics, risk trends, and situational awareness related to developments in the higher education compliance landscape.

Conclusion

This past year brought significant progress in building and strengthening Liberty's compliance program, and the work completed has laid a solid foundation for what comes next. As we look ahead, the mission is clear: continue to strengthen our processes, deepen collaboration across the university, and stay engaged in the work that supports a strong culture of compliance. Every area within Ethics & Compliance, along with each compliance partner across campus, plays a vital role in moving this mission forward. Together, we will continue advancing with purpose, consistency, and a commitment to do the right things, in the right ways, for the right reasons, all of the time. **Go Flames!**