

# LIBERTY UNIVERSITY



OFFICE OF UNIVERSITY COMPLIANCE

# ANNUAL COMPLIANCE REPORT

2025

Presented to the Liberty University Board of Trustees

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## Introduction

The mission of University Compliance is to assist Liberty University in achieving its financial, operational, and strategic goals while promoting an organizational culture that emphasizes the importance of compliance with all governing policies and regulations.

Liberty University understands the importance of creating a culture of compliance that cultivates respect for governing regulations and prioritizes ethical conduct. Liberty University, along with the Office of University Compliance, is committed to standards of excellence in ethics, integrity, and lawful conduct and promotes adherence to all applicable laws and regulations, as well as its internal policies and protocols. We believe compliance should be prioritized and promoted through excellence in every initiative, integrity in every action, and alignment with our Christian principles.

This annual report provides an overview of the establishment of the Office of University Compliance, the mission of our office, our accomplishments in the last year, and the goals we are working toward for future years.

## Compliance Program and Partners

In the fall of 2023, President Dondi E. Costin recognized the benefits of having an office focused on the compliance needs of the university and created the Office of University Compliance. After developing the office framework and structure, our work commenced at the start of 2024. [A governing charter](#), laying out the structure for a successful compliance program, was established. A compliance matrix was also created, highlighting over 200 sets of laws and regulations relevant to the day-to-day operations of the university.





The development of a university-wide compliance program demanded a way to focus support and analysis toward specific areas to systematically review and improve compliance functions. The main business units of the university are now classified as our Core Areas of Focus.

## CORE AREAS OF FOCUS

- ★ Academic Integrity
- ★ Accounting and Taxation
- ★ ADA and Section 504
- ★ Athletics
- ★ Contracts
- ★ Data Privacy and Records Management
- ★ Employee Management
- ★ Environmental Health & Safety
- ★ Financial Stewardship
- ★ Information Technology Security
- ★ Legal
- ★ Title IV
- ★ Title IX and Clery

Under the umbrella of the Office of University Compliance sit several additional teams with specialized focus in compliance. These offices include the Office of Equity & Compliance (Title IX and Clery), the Office of State Approvals, the Office of Internal Audit, and the Office of Government Relations (effective March 2025). Each of these offices serves a distinct role in meeting compliance needs for the university and also supports the overall mission and goal of the Office of University Compliance.

Since collaboration with other university offices and departments is vital to our objectives, we established the Compliance Council to bring compliance experts from different areas together. This council meets on a quarterly basis to prioritize compliance needs, foster collaboration within the university, and build a strong compliance program to support our institution as a whole.

## DEPARTMENTS REPRESENTED *on the* COMPLIANCE COUNCIL

- ✓ Athletics
- ✓ Campus Recreation
- ✓ Community Life
- ✓ Dining Services
- ✓ Disability Accommodation Support
- ✓ Enrollment Management
- ✓ Environmental Health & Safety
- ✓ Equity & Compliance
- ✓ Finance
- ✓ Financial Aid
- ✓ Government Relations
- ✓ Human Resources
- ✓ Information Services
- ✓ Institutional Effectiveness
- ✓ Internal Audit
- ✓ Legal
- ✓ LU Police Department
- ✓ Marketing
- ✓ Planning & Construction
- ✓ Provost
- ✓ Registrar’s Office
- ✓ Risk Management
- ✓ Security & Public Safety
- ✓ Student Activities
- ✓ Student Financial Services
- ✓ Youth Programs

# Compliance Work and Accomplishments

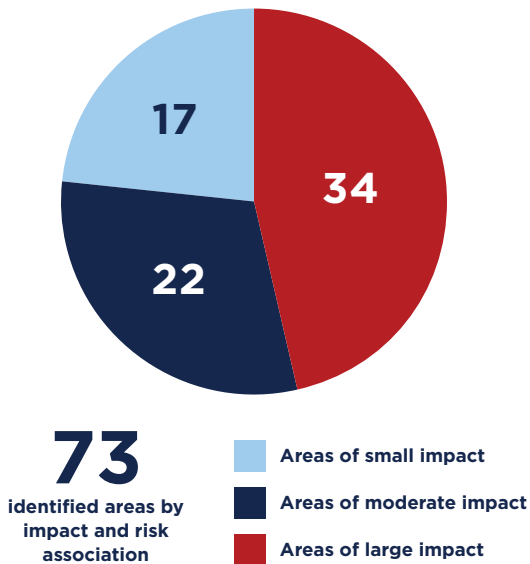
## Compliance Survey

Compliance analysis began in 2024 with the completion of a compliance and risks survey. Our partners from the Compliance Council provided valuable feedback and identified 73 areas of focus and priority.

The survey ranked these areas by scope in order to measure the impact if noncompliance were to occur. These rankings did not represent existing noncompliance but provided priority to areas of greater risk to ensure compliance is maintained. Areas ranked as small impact were defined as impacting a low volume of the university population and requiring small or no changes to current business processes if noncompliance were to occur. Areas ranked as moderate impact were defined as impacting an entire department or group, with potential changes to current business processes required in the event of noncompliance. The areas ranked as large impact were defined as impacting the university as a whole and could potentially require significant changes to current business processes if an incident of noncompliance occurred.

COMPLIANCE AND RISKS SURVEY RESULT:

### AREAS OF FOCUS AND PRIORITY



The survey also ranked the Core Areas of Focus believed to be at highest risk as *Legal, Employee Management, Environmental Health & Safety, Financial Stewardship, Title IX and Clery, Title IV, and Athletics*. If Liberty is noncompliant in these areas, it can lead to costly fines, heavy impacts to business operations if resolutions are delayed, and the potential for major changes to current systems and services.

## Policy Review Support

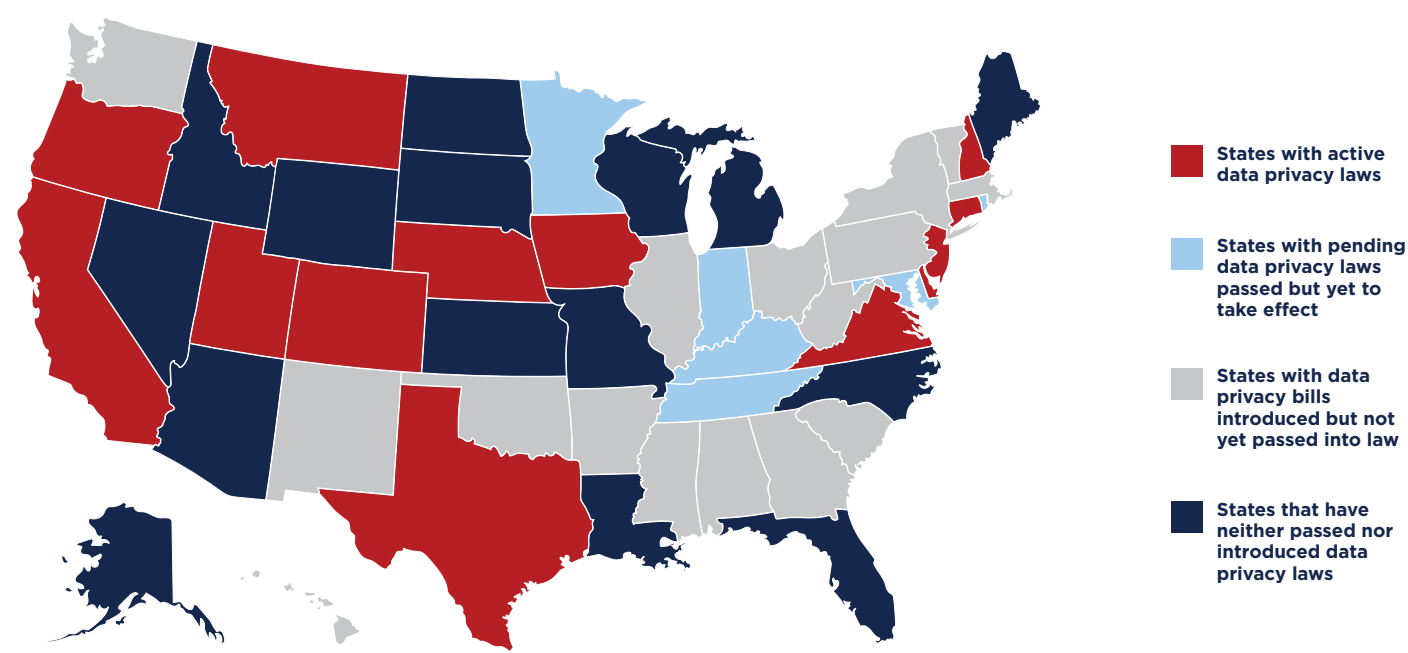
In an effort to support the policy review and centralization of a policy repository for the university, the Office of University Compliance worked in coordination with the Office of Institutional Effectiveness and Research to provide a compliance checklist for individuals seeking to create new policies or significantly edit existing policies. This resource provides direction for policy creation and ensures consistency in policy reviews. The process is housed in [DocTract](#) and will include direction for policy reviews that cover the following:

- A direct response to new or updated local, state, and federal regulations.
- A grievance or complaint process.
- A component of university governance, such as policies concerning the Code of Conduct, Conflict of Interest, Whistleblower Reports, etc.
- Information relating to Title IX, the Clery Act, discrimination, harassment, and misconduct.
- An activity occurring outside of the Commonwealth of Virginia, such as student travel, student placements, hiring out-of-state employees, etc.
- Data governance processes, such as record retention, record deletion, data privacy, cybersecurity, etc.
- Activities with minors, such as summer camp events.

Establishment of a compliance review for policy creation, where appropriate, helps the Office of University Compliance support all areas of the university in compliance reviews and brings awareness to the importance of incorporating applicable laws and regulations into our day-to-day processes.

## Data Privacy Laws for 50 States

An emerging topic within higher education is a student’s right to data privacy and how a student’s data is used when received by institutions. As Liberty University is a large institution, often serving students outside of the Commonwealth of Virginia, it is important to be aware of other state laws that may impact our daily operations. In response, the Office of University Compliance completed a thorough review of data privacy laws for all 50 states. We found that 35 of 50 states have already taken action on implementing data privacy laws.



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

## Americans with Disabilities Act and Section 504 Compliance

One of the first areas of review that came out of our Compliance Council meetings was compliance with the Americans with Disabilities Act (ADA) and Section 504 of the Rehabilitation Act. Our goal has been to ensure

systematic efficiency so that student requests and concerns are quickly and efficiently addressed. The Office of University Compliance has worked with Liberty’s Office of Disability Accommodation Support (ODAS) to assess the existing accommodation process. Partnering with Analytics & Decision Support (ADS), we have been analyzing the technology utilized for intake and fulfillment of student accommodation requests across different areas

of the university, such as dining, facilities, academics, and transit. ODAS and ADS are partnering to improve process efficiencies and ensure that students can work through ODAS to receive the support required for their accommodation. We are targeting improvements through Beacon Group starting in 2025.

Additionally, a subcommittee specifically focused on digital accessibility was created in response to the recent ADA updates released by the Department of Justice in the spring of 2024. While the parallel accommodation requirements found in Section 504 of the Rehabilitation Act have not been updated by the U.S. Department of Education, it is understood that these requirements will be updated at a future point to correspond with the new ADA requirements. We are therefore working toward complying with these updates. We have initiated a 3-stage plan that involves training; auditing our current web content, online platforms, and documents; and instituting an annual plan for review. The first stage of this plan is focused on training Subject Matter Experts (SMEs) in their respective content areas, such as social media, video, web/app, third party applications and tools, Apex/RAFT, document programs (PDF, Word, PPT, etc.), and academic platforms. This will allow us to train a team of experts who, in turn, will train their teams and content editors through standard review, content creation, and new development. This first stage of establishing the team and providing members with training resources is planned to be complete by the end of 2025.

## State Authorization and Licensure Programs

Updated federal regulations required Liberty University to complete a comprehensive review of all licensure programs we offer, both residually and online. This review was to determine if our licensure programs met state requirements for all states, including Virginia. In the event a licensure program did not meet the requirements of a specific state needed for licensure and employment, that program could not be offered to any student residing in that state. As a result, the Office of University Compliance and the Office of State Approvals commenced a comprehensive review project in collaboration with the Office of the Provost, the School of Behavioral Sciences, the School of Education, and the School of Nursing.

Licensure Programs Reviewed:	184
Total of Individual State and Program Reviews:	9,700
New Programs Created:	44

The School of Education created new and unique programs in order to meet individual state requirements and keep programs open for students. Additionally, course creation and new advising processes were implemented for all the schools involved.

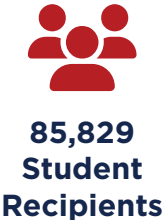
The goal of this project was to meet federal compliance requirements while also maintaining access for our students to enroll in our licensure programs. Fewer than 5% of our licensure programs — only 8 of 184 — had to be closed for all students located outside of Virginia.

**OVER 93%**  
of Liberty University's  
**online licensure  
programs**  
remain open for enrollment  
in approved states.

While some states had programs closed for their residents, other options within the same career field and license type are often available and highlighted through our advising and onboarding conversations.

Finally, as part of this project and federal regulations, licensure program disclosures are required for all new and matriculated students. These disclosures are required to be direct communications specific to the student's program and the state where they are located, ensuring that students

are properly informed about state requirements for their licensure programs. In fulfillment of licensure program disclosure requirements, 144,974 disclosures were sent to 85,829 unique students.



These disclosures help not only the student but also the university because we are all on the same page of what will be required for students to be gainfully employed following the successful completion of a program.

## Trainings

A goal of the Office of University Compliance is to provide awareness through training. This supports our overall mission of creating a compliance-focused culture and provides valuable information to employees as they complete day-to-day tasks.

### Family Educational Rights and Privacy Act (FERPA)

In January 2025, university-wide FERPA training was launched. This was an extensive and collaborative effort between the Office of University Compliance, the Registrar’s Office, and the Office of Institutional Effectiveness and Research. The goal was to identify employees who accessed FERPA-protected data as a part of their job requirements and provide them with annual training to ensure compliance with FERPA requirements as they relate to student educational records.

### EMPLOYEE FERPA TRAINING



**Employees Eligible: 7,498**



**FERPA Training  
Completion Rate: 90%**

*Data as of March 2025*

Additionally, as some employees only have access to student contact information — considered directory information under FERPA — we established a line of communication to bring awareness to the sensitivity and limitations of this material as defined in Virginia state law. We provided 923 employees with this line of communication.

This training laid the groundwork for future university trainings and encouraged the culture of compliance across our operations for all employees.

### Campus Security Authorities and Responsible Employees (Title IX)

As is required by law, individuals identified as Campus Security Authorities, as outlined in the Clery Act, are required to complete annual training. The Office of Equity & Compliance worked tirelessly to properly identify individuals who needed training, developed a comprehensive training course, and created ways to audit and report the completion of such training.



*Data as of March 2025*



# The Road Map for 2025

As we have an extensive list of goals and projects for the years ahead, we are accomplishing these in stages. Some of the projects outlined above are in progress already, while others are in the early stages or will be completed within the next year. In an effort to remain accountable, we have highlighted our priorities below.

## Communications Plan

A plan for efficient, effective communication surrounding state and federal laws and regulations is being developed. Our goal is to have a system that sends quick news alerts that provide individuals with action steps and appropriate points of contact for each update. This plan aims to bring cohesion to communications, ensure that all necessary parties are made aware, and centralize compliance work for implementation by the responsible office. The platforms used to disseminate this communication are still being discussed and developed with a final goal of Summer 2025 for implementation.

## Youth Programs Campus Security Authority Training

Summer activities bring hundreds of minors (people under the age of 18) to our campus. Liberty University sponsors some of these activities, but we also host other organizations on campus that are responsible for leading their own activities. Regardless of who may have oversight, it is important that we provide a safe and meaningful experience for the youth on our campus. Thus, we will be working over the next few months to develop proper training for those who work with and are responsible for minors visiting our campus. This will include CSA training, awareness training for mandated reporters, and development of a Youth Protections Policy to support all functions of the university. Our goals are to implement some aspects of this training for the activities of Summer 2025 and then to further develop policy and training to be finalized for Summer 2026.

## Business Data Governance

The Compliance Council will begin to focus on the topic of data governance in their spring meeting. This will kick off a long-term project of review, formal policy creation, and proper data management for each business unit. As this project is intended to provide a formal policy for the university as a whole, it will take effort and perseverance to review and complete the project for each business unit.

## Consumer Information Review

Consumer information is not a new topic, nor is compliance with these federal requirements new to Liberty University. However, as a matter of principle and to promote excellence in all we do, we are planning to review all required consumer information for accuracy, compliance with applicable regulations, and ease of access. As a Title IV awarding institution, Liberty University must make a great deal of information available to the community. Our goal is to ensure this information is easily accessible and presented in a user-friendly manner.

## Environmental Health & Safety Discovery

The number of regulatory items pertinent to environmental health & safety outweighs even the requirements for institutions that receive Title IV funding. Because of the significant reporting and compliance requirements, particularly through the Occupational Safety and Health Administration, the Office of University Compliance will complete a discovery review of this area. The goals of this review are to achieve familiarity with requirements and understanding of current processes, as well as to provide support to compliance initiatives as needed. While we currently have a robust EHS office, we want to ensure

that we are supporting compliance functions as part of the institution's compliance program. This review is scheduled to begin in August 2025.

## Movie Licensing

The Office of Campus Recreation works diligently to ensure compliance in all rentals and purchases of movie licenses. However, there may be opportunities to make current processes more effective and to find more efficient ways of ensuring copyright laws are followed. The Office of University Compliance plans to complete a review of our current process surrounding movie licensing and provide any necessary support to create a more robust process that will enhance compliance and assist in serving our students in their extracurricular activities.

## Conclusion

We understand that compliance cannot be achieved in a single step or by a single office, and we appreciate the support and collaboration we receive from each of our partners to complete the mission set forth for us: **to assist Liberty University in achieving its financial, operational, and strategic goals while promoting an organizational culture that emphasizes the importance of compliance with all governing policies and regulations.**

Our goal is to serve as a resource and support to Liberty University and its community, creating awareness and cultivating a culture focused on compliance. We look forward to our work together as we make compliance a priority and strive for excellence in every initiative, integrity in every action, and alignment with our Christian principles in all things. The Office of University Compliance is excited about the future!

