



THE UNIVERSITY OF TENNESSEE  
BOARD OF TRUSTEES

AUDIT AND COMPLIANCE COMMITTEE	
10:30 a.m. Eastern/9:30 a.m. Central	Executive Conference Room
Friday	JIAM
May 8, 2020	2641 Osprey Vista Way
	Knoxville, Tennessee 37996

AGENDA

**Public Session**

- I. Call to Order
- II. Roll Call
- III. [Consent Agenda](#) ..... Tab 1
  - Action Items
  - A. [Approval of Minutes from Last Meeting](#) ..... Tab 2
  - Information Items
  - B. [2020 Audit Plan Update](#) ..... Tab 3
  - C. [Compliance Program Update](#) ..... Tab 4
  - D. [Outstanding Audit Issues](#) ..... Tab 5
  - E. [Travel Exception Report](#) ..... Tab 6
- IV. [UT System Title IX Annual Report](#) ..... Tab 7
- V. [UT System Clery Act Compliance Update](#) ..... Tab 8
- VI. COVID-19 Updates
  - A. [UT System FEMA COVID-19 Claim](#) ..... Tab 9
  - B. [OAC Priorities & Risk Identification](#) ..... Tab 10
- VII. Other Business  
*Note: Under the Bylaws, items not appearing on the agenda may be considered only upon an affirmative vote representing a majority of the total voting membership of the Committee. Other business necessary to come before the Committee at this meeting should be brought to the Committee Chair's attention before the meeting.*
- VIII. Adjournment



# THE UNIVERSITY OF TENNESSEE BOARD OF TRUSTEES

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## AGENDA ITEM SUMMARY

Meeting Date: May 8, 2020

Committee: Audit and Compliance

Item: **Consent Agenda**

Type: Action

Presenter: Amy Miles, Committee Chair

Certain action items have been placed on the Committee Consent Agenda. These items will not be presented or discussed in the Committee unless a Committee member requests removal of an item from the Consent Agenda. In accordance with the Bylaws, before calling for a motion to approve the Consent Agenda, the Committee Chair will ask if any member of the Committee requests that an item be removed from the Consent Agenda. The Bylaws provide that an item will not be removed from the Consent Agenda solely for the purpose of asking questions for clarification. Those questions should be presented to the Secretary before the meeting.

### Committee Action

If there are no request to remove an item from the Consent Agenda, the Committee Chair will call for the prepared motion below, a second, and a voice vote. If the motion passes, the items requiring Board approval will go forward to the Consent Agenda of the full Board meeting.

Motion: I move that

1. Minutes of the February 3, 2020 meeting of the Committee be approved as presented in the meeting materials, provided that the Secretary be authorized to make any necessary edits to correct spelling errors, grammatical errors, format errors, or other technical errors subsequently identified.



THE UNIVERSITY OF TENNESSEE  
BOARD OF TRUSTEES

MINUTES OF THE AUDIT AND COMPLIANCE COMMITTEE

February 3, 2020  
Knoxville, Tennessee

The Audit and Compliance Committee of The University of Tennessee Board of Trustees met at 2:00 p.m. EST on February 3, 2020, in the 8<sup>th</sup> Floor Conference Room, Andy Holt Tower, Knoxville, Tennessee.

**I. Call to Order**

Ms. Amy Miles, Chair, called the meeting to order.

**II. Roll Call**

Board Secretary, Cynthia C. Moore, called the roll, and the following members of the Audit and Compliance Committee were present: Amy E. Miles, Brad Box (by telephone), John C. Compton (by telephone), D. Crawford Gallimore (by telephone), and Decosta E. Jenkins (by video). In addition, Trustee Jamie Woodson was in attendance. Trustees participating electronically confirmed no one else was present at their various locations. Ms. Moore announced the presence of a quorum.

Interim President Randy Boyd participated in the meeting via telephone. Others present in Knoxville included: Brian Daniels, Chief Audit and Compliance Officer; David Miller, Chief Financial Officer; Ryan Stinnett, Interim General Counsel; Tiffany Carpenter, Vice President for Communications and Marketing; staff members from the Office of Audit and Compliance ("OAC"); and other members of the UT administrative staff.

**III. Consent Agenda**

Chair Miles asked whether any committee member would like to remove an information item from the Consent Agenda for discussion. Hearing no requests, she called for a motion that the minutes of the September 25, 2019, meeting be approved as presented in the meeting materials. Upon motion duly made and seconded, a roll call vote was taken, and the minutes were approved.



#### IV. Office of Emergency Management – Annual Report

Mr. Brian Daniels, Chief Audit and Compliance Officer, introduced Mr. Mike Gregory, Director, Special Events & Emergency Management. Mr. Gregory began his presentation by noting that the Office of Emergency Management prepares a report annually and that the most recent report is for FY 2018–2019 (“Annual Report”). He explained the organizational structure for emergency management at the University, including his role in facilitating, coordinating and supporting the efforts of the emergency managers from the various UT campus and institute locations. Mr. Gregory advised that he attends monthly meetings with other emergency services coordinators across the state and serves as the University’s point of contact with the Tennessee Emergency Management Agency (“TEMA”).

The Office of Emergency Management is responsible for providing university officials with guidelines to assist in the development and maintenance of plans and procedures that meet emergency prevention/mitigation, preparedness, response and recovery requirements within the National Incident Management System and the Tennessee Emergency Management Plan.

Mr. Gregory shared highlights from the Office of Emergency Management’s Annual Report, including: (i) achievements for the fiscal year; (ii) disaster, emergencies and disruption events; (iii) training efforts; and (iv) goals for FY 2019-2020. A copy of the Annual Report is filed with these minutes.

In response to questions raised by members of the Committee, Mr. Gregory provided additional information regarding the following items:

- Training requirements for staff (orientation and on-going efforts);
- The advantages/costs associated of weather tracking applications/alerts;
- Focus of table top exercises (active shooters, weather events (tornadoes), etc.);
- Unique location considerations (e.g., AG Extension offices, where University employees are located, but the facilities are owned by local municipalities); and
- Various certification standards.

Mr. Gregory also indicated that, as part of the collaboration efforts, the emergency managers share information on new initiatives, best practices, and conduct peer reviews of the campuses’ emergency management plans.



Chair Miles inquired as to the interaction between the University's Office of Emergency Management and the Office of Communications and Marketing, with regard to both internal and external communications. Mr. Gregory advised that he is a direct report to the Vice President for Communications and Marketing. Ms. Carpenter reported that the University's crisis communication plan considers both internal and external communications processes in the event of a crisis situation.

## V. 2020 Internal Audit Plan

Mr. Daniels reminded the Committee that the Internal Audit Plan is prepared on an annual, calendar year, basis. He provided background information on how information is obtained and incorporated into the proposed plan. Mr. Daniels discussed staffing changes regarding efforts to fill an open position at UT Martin, and the recent loss of an information technology ("IT") auditor. Chair Miles acknowledged that it is difficult to retain qualified IT auditors based on the increased demand and encouraged Mr. Daniels to act quickly to start a search given the length of time that could be involved in filling the position.

The Internal Audit Plan for the year ending December 31, 2020 ("2020 Internal Audit Plan") was presented to the Committee by Mr. Daniels. He explained that the annual plan includes five broad categories of work:

- *Risk-Based & Compliance* - Planned engagements based on risk assessment;
- *Annual Audits* - Required by statute, administrative policy, or agreements with management;
- *Special Projects and Fraud, Waste and Abuse (FWA) Investigations;*
- *Prior Year* - Audits in progress on January 1, 2019; and
- *Advisory Service* - Value-added work and consulting.

Mr. Daniels reviewed the allocation of effort for the prior fiscal year for the above-mentioned categories, noting that the majority of the team's effort was focused on risk-based and compliance audits, along with annual audits (collectively, approximately 65%). He advised that most of the effort was directed at system-wide matters.

Chair Miles inquired as to whether the University's focus is consistent with others in the higher education industry. Mr. Daniels stated that, based on his experience at other institutions and what he has seen on peer reviews, the focus is alignment with other institutions.



Mr. Daniels highlighted certain risk-based audits that are planned for the upcoming year, several of which pertain to items raised by the Office of Comptroller in connection with the Performance Audit Report ("Sunset Audit"). These risk-based audits include the following:

- Clery Act Compliance;
- Background Checks;
- International Travel; and
- Programs for Minors.

Mr. Daniels highlighted that, the timing of Clery Act compliance reviews, may be adjusted based on findings from the ongoing audit. Where modifications are being made to policies/procedures, it is natural to have an audit lag in order to allow sufficient time for such policies/procedures to be implemented.

With respect to background checks, the Committee members inquired as to the University's current practices and policies, including whether employees have an obligation to report arrests or convictions for certain types of criminal activities. Mr. Ryan Stinnett, Interim General Counsel, explained that there is no current policy that contains such a requirement. In this regard, it was suggested that management consider whether policy changes would be appropriate.

In response to a question from a Committee member regarding responsibilities for conducting FWA investigations, Mr. Daniels discussed the reporting requirements and working relationship between the University's OAC and the Office of the Comptroller for conducting these types of investigations.

Upon motion duly made and seconded, a roll call vote was taken, and the 2020 Internal Audit Plan was approved.

## **VI. 2020 Institutional Compliance Work Plan**

Mr. Bill Moles, Director of Institutional Compliance, presented the Work Plan for the year ending December 31, 2020 ("2020 Compliance Work Plan"). Mr. Moles began by providing an overview of the organizational structure of the University's compliance program and showing the planned changes in responsibilities. He reminded the members of the Committee that these actions are reflective of recommendations made by Baker Tilly, based on an external review of the University's institutional compliance program. The plan incorporates the following items:



- Strategic Compliance Oversight. Streamline the risk assessment process to enable strategic identification and prioritization of top compliance risks.
  - Expand the responsibilities of the UT System Administration Institutional Compliance Committee; and
  - Include UT System Administrative Council involvement in prioritizing and validating top compliance risks.
  
- Collaboration. Expand opportunities for sharing leading practices across the System.
  - New regulations and policy changes;
  - Identified risks;
  - Best practices; and
  - Compliance leader roundtable.
  
- Monitoring. Improve the feedback loop for monitoring effectiveness of the compliance program.
  - Executive and mid-level management; and
  - Compliance officers; and
  - Compliance committee members.

Fully implement and refine an automated procurement card monitoring process for future monitoring and audits.
  
- Compliance Risk Assessments and Action Plans. Five-year cycle.
  - Perform new compliance risk assessments at UT Knoxville and UT Chattanooga; and
  - Track implementation of risk mitigation plans at other campuses and institutes.
  
- Promote an Ethical Culture.
  - Promote the UT Compliance Hotline, the Code of Conduct, and other compliance and ethics information; and
  - Promote the Code of Conduct training module to campuses/institutes and encourage them to require the training.

Mr. Moles noted that actions taken to promote an organizational culture that encourages ethical conduct and a commitment to compliance with the law is a basic tenant of an effective compliance and ethics program as set forth in the federal sentencing guidelines.



He also informed the members of the Committee that the Code of Conduct training module is not currently a requirement across the University system. The members of the Committee inquired as to the administrations plan to require the training, and Mr. Daniels indicated that it is something that will be reviewed and discussed with the Committee at a future meeting.

Upon motion duly made and seconded, a roll call vote was taken, and the 2020 Institutional Compliance Work Plan was approved.

#### **VII. 2020 IT Security - External Assessment Update**

Mr. Daniels provided an update on the administration's plans for conducting an external assessment of the University's IT security. Specifically, OAC is working with the University's procurement office on the preparation of either a request for information ("RFI") or request for proposals ("RFP"). Mr. Daniels and Mr. Miller discussed the potential benefits of the assessment and how it may inform the work associated with the University's contemplated enterprise resource planning ("ERP") efforts. Mr. Daniels indicated that the assessment will focus on key areas of control, including: identity/access; incident response; system and communication protection; and system and information integrity. Members of the Committee offered their interest in reviewing the RFI/RFP before it is sent to prospective vendors.

Following this discussion, Mr. Miller advised that, with respect to the Code of Conduct training discussed earlier in the meeting, there are certain training programs that are required for all employees across the University system and that the UT System Administrative Council can consider whether the Code of Conduct training should be mandated.

#### **VIII. Other Business (none brought to the Chair's attention prior to the meeting)**

#### **IX. Adjournment**

There being no further business to come before the Committee, the Chair adjourned the meeting.

Respectfully Submitted,

A handwritten signature in blue ink that reads "Cynthia C. Moore".

Cynthia C. Moore  
Secretary and Special Counsel



Approved Consent Agenda Items

- Minutes of the Prior Meeting (September 25, 2019)

List of Information Items Presented to the Committee

- 2019 Audit Plan Update
- 2019 Outstanding Audit Issues
- Travel Exception Report

**The University of Tennessee  
Office of Audit and Compliance  
2020 Audit Plan Status  
As of March 31, 2020**

Audits	Status	
Prior Year	System Effort Reporting	In Progress
Prior Year	System Clery Act Compliance	In Progress
Prior Year	UTK Export Controls	In Progress
Prior Year	UTK Key Business Controls Assessment	In Progress
Prior Year	UTC Key Business Controls Assessment	In Progress
Prior Year	UTC Office of Financial Aid	In Progress
Prior Year	UTIA Entomology and Plant Pathology IT Security	In Progress
Prior Year	UTIA Extension County Offices	In Progress
Prior Year	UTIA Lone Oaks Farm	In Progress
Prior Year	IPS TN Language Center	In Progress
2020	System Background Checks for Existing Employees	Scheduled
2020	System Clery	Scheduled
2020	System Complete College Tennessee Act	Scheduled
2020	System Conflicts of Interest	In Progress
2020	System International Travel	Scheduled
2020	System IT Security Controller Office Security Plan	In Progress
2020	System IT Security Parking Services	In Progress
2020	System MSSQL Security Configuration Business Intelligence	In Progress
2020	System President`s Office	Scheduled
2020	System UTSA Division Policy Compliance	Scheduled
2020	System Windows Server Security	In Progress
2020	UTK Admin Division Policy Compliance	Scheduled
2020	UTK Athletics NCAA Compliance Eligibility	In Progress
2020	UTK Effort Reporting College of Nursing	In Progress
2020	UTK IT Security College of Arts and Sciences	In Progress
2020	UTK Programs for Minors	In Progress
2020	UTK Student Tuition and Fee Refunds	In Progress
2020	HSC Admin Division Policy Compliance	In Progress
2020	HSC Cash Controls	In Progress
2020	HSC Export Controls	Scheduled
2020	HSC HIPAA Security Rule UTHSC	Scheduled
2020	HSC Intellectual Property	Scheduled
2020	HSC Management Services Agreements	Scheduled
2020	HSC Office of Sponsored Programs	Scheduled
2020	UTC Admin Division Policy Compliance	Scheduled
2020	UTC Athletics NCAA Compliance Eligibility	Scheduled
2020	UTC Chancellor	Scheduled
2020	UTC Vendor Insurance	Scheduled
2020	UTM Admin Division Policy Compliance	Scheduled
2020	UTM Athletics NCAA Compliance Eligibility	Scheduled
2020	UTM Cash Controls	In Progress
2020	UTM Chancellor	Scheduled
2020	UTM Office of Sponsored Programs	Scheduled
2020	UTM OVC Student Assistance Fund	Scheduled
2020	UTIA Export Controls	Scheduled
2020	UTIA Extension Regional and County Offices	Scheduled
2020	UTIA Sponsored Projects Accounting	Scheduled
2020	IPS IT Security Tennessee Language Center	In Progress

**The University of Tennessee  
Office of Audit and Compliance  
2020 Audit Plan Status  
As of March 31, 2020**

**Advisory**

2020	System Self-Assessment of Controls	In Progress
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**Investigations**

		<b>Status</b>
Prior Year	UTK MABE Dept Foreign vendor equipment purchase	In Progress
Prior Year	UTIA College of Veterinary Medicine – check deposits	In Progress
2020	System Miscellaneous Fraud Allegations	Scheduled
2020	UTK Civil and Environmental Engineering	In Progress
2020	UTK CVM Center for Agriculture Food Safety and Preparedness (CASFP) Effort Reporting	In Progress
2020	HSC Pediatrics Research Gift Cards and Transfers	In Progress
2020	UTC Athletics Box Office	In Progress

**Completed Projects**

		<b>Status</b>
Prior Year	System General & Application Controls ANDI	Complete
Prior Year	System Conflicts of Interest	Complete
Prior Year	UTK Emergency Management	Complete
Prior Year	UTK Department of Theatre IT Security Departmental Audit	Complete
Prior Year	UTK Dept of Supply Chain Management Pcard and Vehicle Use	Complete
Prior Year	UTK Division of Student Life IT Security Divisional Audit	Complete
Prior Year	UTIA Extension Laptop Order	Complete
2020	UTK Psychological Clinic IT Security Assessment	Complete

# University of Tennessee Institutional Compliance

## May 2020 Report

This report includes a synopsis of the accomplishments of the Office of Institutional Compliance thus far in 2020. In addition, the Attachment provides a summary of the significant risks that have been identified at the campuses and institutes, and the progress that has been made to mitigate those risks.

### Table of Contents

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• UT Institute of Agriculture	page 12
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# University of Tennessee Institutional Compliance

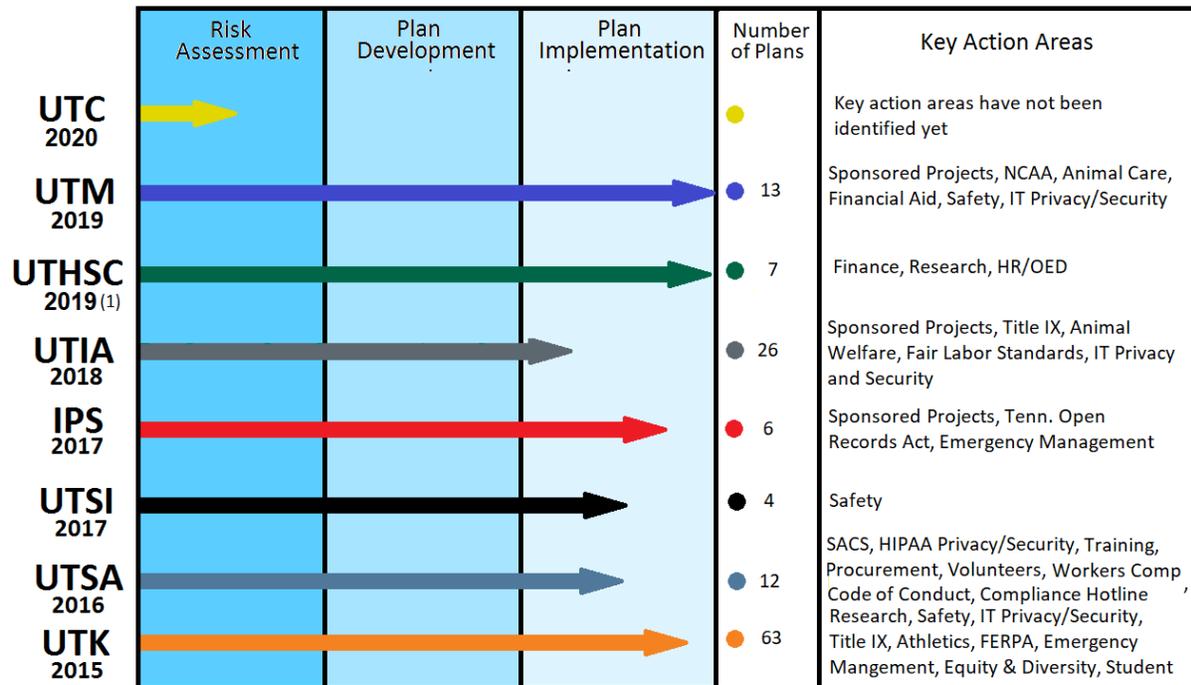
## May 2020 Report

### Executive Summary

#### Institutional Compliance Key Accomplishments for 2020

- UT Chattanooga has launched its comprehensive compliance risk assessment scheduled for 2020. Applicable regulations and compliance officers have been verified. Compliance officers have been trained and are in the process of completing their risk assessments.
- Preparations are underway at UT Knoxville to launch a comprehensive compliance risk assessment in the fall of 2020.
- As recommended by the Baker Tilly compliance program review to provide more strategic oversight over all of the campuses, the UT System Institutional Compliance Committee has assumed responsibility for identifying and addressing the strategic compliance risks for the full university system. Five additional members from various functional areas have been added to the committee in order to provide more comprehensive representation and expertise.
- The graph below summarizes the progress made by the campuses and institutes on their risk assessments.
- The **Attachment** provides risk heat maps and accomplishments for the campuses and institutes.

#### Compliance Risk Management Progress



(1) UTHSC is performing a risk assessment independent of the UTSystem risk assessment process.

## The Office of Institutional Compliance 2020 Objectives and Accomplishments

The 2020 objectives and accomplishments for the Office of Institutional Compliance are given below.

### Strategic Compliance Oversight

1. *Streamline and refocus the risk assessment process to enable strategic identification and prioritization of top compliance risks.*
  - The responsibilities of the UT System Institutional Compliance Committee have been expanded to include identifying and addressing the strategic compliance risks for the full university system. Five additional members from various functional areas have been added to the system committee in order to provide more comprehensive representation and expertise in identifying system-wide risk.
  - The UT System Administrative Council will be engaged in prioritizing and validating top compliance risks following the initial meeting of the revised UT System Institutional Compliance Committee.

### Collaboration

1. *Expand opportunities for sharing leading practices across the System.*
  - A Compliance Leader Roundtable is scheduled for October 2020.

### Monitoring

1. *Implementation of a feedback loop to monitor the effectiveness of the system-wide compliance program (e.g., survey or interviews with compliance program stakeholders).*
  - A feedback process is being developed to collect input from supervisors of compliance officers who implemented risk mitigation plans. This is the final step. Feedback processes are already in place for compliance officers, compliance committee members, and campus/institute executive management.
2. *Fully implement and refine an automated procurement card monitoring process.*
  - Automating the procurement card data analytics process is under development.

### Compliance Risk Assessments and Risk Mitigation Plans

1. *Perform a compliance risk assessment at UT Chattanooga (UTC) and UT Knoxville (UTK).*
  - The risk assessment process has been launched at UTC. The UTK risk assessment is scheduled to begin in the fall of 2020.
2. *Track implementation of risk mitigation plans at other campuses and institutes.*
  - The progress of implementing risk mitigation plans is provided in the **Attachment**.

### Promote an Ethical Culture

1. *Promote the UT Compliance Hotline, the Code of Conduct, and other compliance and ethics information.*
  - An article in the *For Your Benefit* HR magazine and a broadcast email on the Code of Conduct and Hotline are planned in the fall for the new academic year.
2. *Promote the Code of Conduct training module to campuses/institutes and encourage them to require training. (UTC, UTHSC, UTIA)*
  - Campus/institute institutional compliance committees will be encouraged to address this issue with their respective executive management.

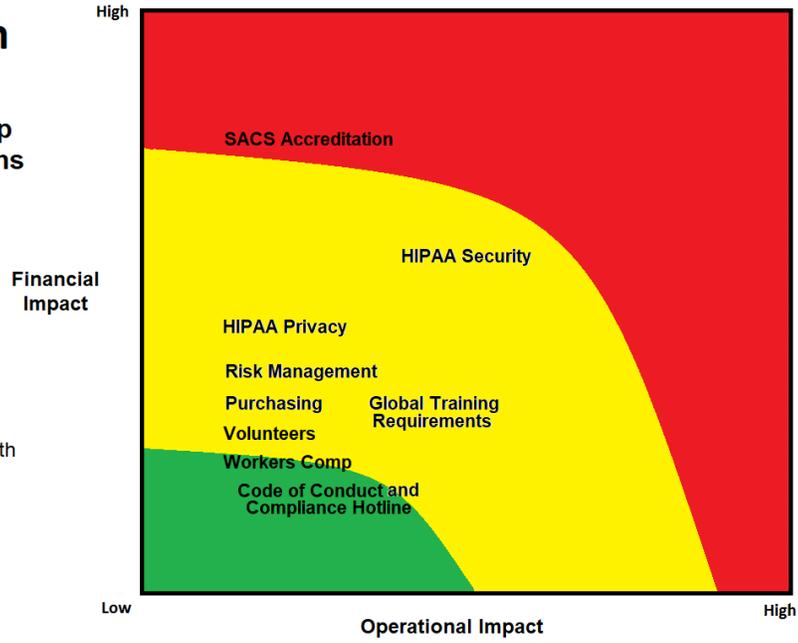
Campus/Institute Risks and Risk Mitigation Plans

Attachment

UT System  
Administration

Residual Risk Heat Map  
for Risk Mitigation Plans

These are the areas of concern being addressed with risk mitigation plans.



Administrative Area	Compliance Area	Plans in Process	Plans Implemented
Academic Affairs	SACS Accreditation		1
Audit and Compliance	Global Training Requirements	1	
	Code of Conduct	1	
	Compliance Hotline		1
Finance	Volunteer Liability		1
	Worker's Comp		1
	Purchasing		1
	HIPAA Security	2	
	HIPAA Privacy	2	1
	<b>Total</b>	6	6

## Campus/Institute Risks and Risk Mitigation Plans

## Attachment

### University of Tennessee System Administration (UTSA) UTSA Institutional Compliance Committee 2020 Objectives

*Objective 1: Restructure the risk assessment process to involve executive management in the strategic identification and prioritization of top compliance risks.*

- The responsibilities of the UT System Institutional Compliance Committee have been expanded to include responsibility for identifying and addressing the strategic compliance risks for the full university system. Five additional members from various functional areas have been added to the committee in order to provide more comprehensive representation and expertise.
- The UT System Administrative Council will be engaged in prioritizing and validating top compliance risks following the initial meeting of the revised UT System Institutional Compliance Committee.

*Objective 2: Monitor the implementation of risk mitigation plans.*

Six of 12 plans to improve controls have been fully implemented. Six plans are still in progress in the following basic areas.

- Compliance training: A System-wide Training Advisory Group has been established to address compliance training (including Code of Conduct training).
- HIPAA Privacy: A revised HIPAA policy has been approved, but has not been published. HIPAA privacy rule compliance needs to be regularly monitored at non-UT Health Science Center locations.
- HIPAA Security: An oversight plan has been developed, and are in the process of reviewing procedures at the various entities.

*Objective 3: Implement a feedback loop for monitoring the effectiveness of the compliance program.*

The UTSA Institutional Compliance Committee has identified the key stakeholders (compliance officers, compliance officer supervisors, committee members, and executive management). Feedback has been collected from all key stakeholders except for compliance officer supervisors, who will be surveyed in 2020.

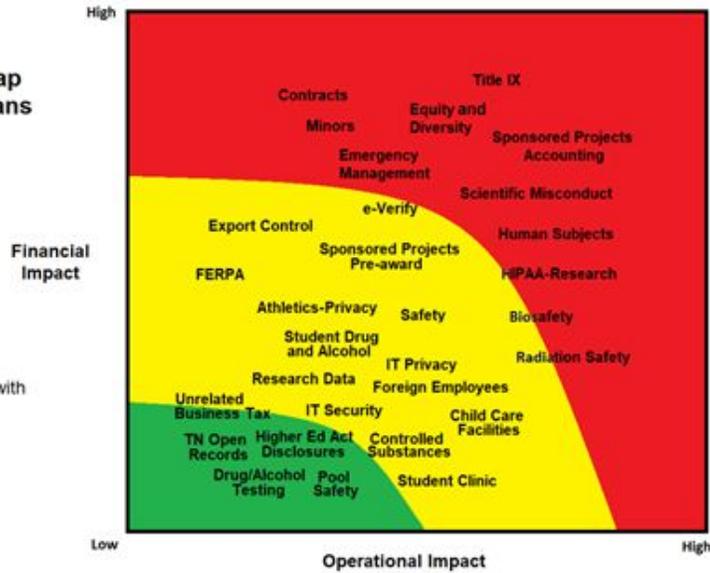
# Campus/Institute Risks and Risk Mitigation Plans

# Attachment

## UTK

**Residual Risk Heat Map for Risk Mitigation Plans**

These are the areas of concern being addressed with risk mitigation plans.



Administrative Area	Compliance Area	Plans in Process	Plans Implemented
Athletics	Athletics - Privacy		1
Communications	TN Open Records		1
Equity and Diversity	Equity and Diversity		6
Finance and Adm.	Biosafety		3
	Contracts		1
	Emergency Management	2	1
	FERPA		1
	IT Privacy and Security	3	1
	Minors		1
	Radiation Safety		4
Human Resources	Safety		13
	Sponsored Projects Accounting	1	2
	Unrelated Business Tax		1
Human Resources	Drug/Alcohol Testing		1
	E-Verify		1
Provost	Child Care Facilities		1
	Foreign Employees		1
	Pool Safety		1
Research	Controlled Substances		1
	Export Control		1
	HIPAA - Research		1
	Human Subjects	1	1
	Research Data		1
	Scientific Misconduct		1
Student	Sponsored Projects Pre-Award		4
	Higher Ed Act - Disclosures		1
	Student Clinic		1
	Student Drug and Alcohol		2
	Title IX		1
	<b>Total</b>	<b>7</b>	<b>56</b>

## Campus/Institute Risks and Risk Mitigation Plans

## Attachment

### University of Tennessee, Knoxville (UTK)

### UTK Institutional Compliance Committee 2020 Objectives

4

*Objective 1: Monitor the implementation of risk mitigation plans developed from the 2015 risk assessment.*

Fifty-six of the 63 plans to improve controls have been fully implemented. No additional plans have been implemented during 2020. Seven risk mitigation plans are in the process of being implemented in the following four basic areas.

1. Emergency management
2. IT privacy and security
3. Sponsored project accounting
4. Human subjects

*Objective 2: Perform a new comprehensive compliance risk assessment for 2020.*

A new comprehensive compliance risk assessment is scheduled for the fall of 2020.

*Objective 3: Follow up on the policy gap analysis to ensure UTK procedures that are required by University policies are developed or revised where needed.*

The UTK Institutional Compliance Committee performed an analysis of UTK procedures that are required by UT System policy. Campus procedures have been developed or revised in the following areas:

1. Programs for Minors
2. Sponsored projects- cost sharing
3. Fleet management
4. Personnel files and release of information

Procedures need to be developed in three Human Resources policy areas and one Student Life area. The committee will follow up on corrective actions in these areas.

*Objective 4: Address the issue of required compliance training for the campus.*

The UTK Institutional Compliance Committee is in the process of addressing this issue. UTK personnel are participating in the newly created System-wide Training Advisory Group.

*Objective 5: Implement a feedback loop for monitoring the effectiveness of the compliance program.*

The UTK Institutional Compliance Committee has identified the key stakeholders (compliance officers, compliance officer supervisors, committee members, and executive management). Feedback has been collected from all key stakeholders except for compliance officer supervisors, who will be surveyed in 2020.

*Objective 6: The UTK Institutional Compliance Committee will communicate compliance issues and priorities to UTK executive management for their verification of the risks and obtain their input on strategic priorities.*

The UTK Institutional Compliance Committee and UT System Administration Institutional Compliance representatives will present priorities and accomplishments from the 2015 risk assessment to UTK executive management in 2020. In addition, steps will be taken to engage UTC executive management in verifying and prioritizing the risks identified in the 2020 UTC comprehensive compliance risk assessment.

**Campus/Institute Risks and Risk Mitigation Plans****Attachment****University of Tennessee, Chattanooga (UTC)****UTC Institutional Compliance Committee 2020 Objectives****4**

*Objective 1: Perform a new comprehensive compliance risk assessment for 2020.*

The 2020 comprehensive compliance risk assessment is in process and approximately one-half complete as illustrated below. The UTC Institutional Compliance Committee will review the results of the risk assessment once it is complete.

<b>Administrative Area</b>	<b>Compliance Officers</b>	<b>Regulations</b>	<b>Completed Risk Assessments</b>
Academic Affairs	8	17	6
Athletics	2	5	2
Chancellor	3	19	1
Communications and Marketing	2	4	0
Development and Alumni Affairs	1	2	0
Finance and Operations	14	179	127
Research and Graduate School	7	49	20
Student Affairs	9	27	9
<b>Total</b>	<b>46</b>	<b>302</b>	<b>165</b>

*Objective 2: Perform a policy gap analysis of UTC procedures required by University policies.*

A Policy Review Committee has been established on campus. UT System policies have been distributed to their UTC campus owners to determine whether UTC procedures exist and are sufficient.

*Objective 3: Address the issue of required compliance training for the campus.*

The UTC Institutional Compliance Committee is developing a preliminary list of compliance areas that need to be considered for training. A review of required training by peer institutions has been completed. The committee also plans to develop procedures for proposing required training to management. In addition, UTC personnel are participating in the System-wide Training Advisory Group, which is addressing compliance training.

*Objective 4: Implement a feedback loop for monitoring the effectiveness of the compliance program.*

The UTC Institutional Compliance Committee has identified the key stakeholders (compliance officers, compliance officer supervisors, committee members, and executive management). Feedback has been collected from all key stakeholders except for compliance officer supervisors, who will be surveyed in 2020.

*Objective 6: The UTC Institutional Compliance Committee will communicate compliance issues and priorities to UTC executive management for their verification of the risks and obtain their input on strategic priorities.*

The UTC Institutional Compliance Committee and UT System Administration Institutional Compliance representatives will take steps to engage UTC executive management in verifying and prioritizing the risks identified in the 2020 UTC comprehensive compliance risk assessment.

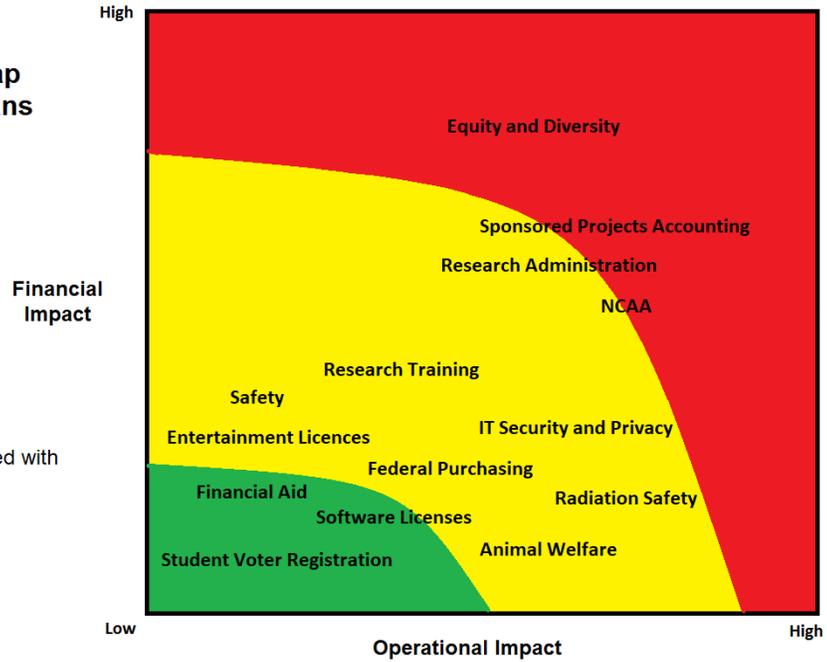
# Campus/Institute Risks and Risk Mitigation Plans

# Attachment

## UTM

### Residual Risk Heat Map for Risk Mitigation Plans

These are the areas of concern being addressed with risk mitigation plans.



Administrative Area	Compliance Area	Plans in Progress	Plans Implemented
Academic Affairs	Animal Care		1
	Financial Aid		1
	Foreign Nationals		1
	Radiation Safety		1
	Student Radio		1
Athletics	NCAA		1
Finance and Administration	Safety/Health		1
	Sponsored Projects Accounting		3
Information Technology Services	IT Privacy		1
	Software Licensing and Copyright Law		1
Student Affairs	Student – Voter Registration		1
<b>Total</b>			<b>13</b>

**Campus/Institute Risks and Risk Mitigation Plans****Attachment****4****University of Tennessee, Martin (UTM)****UTM Institutional Compliance Committee 2020 Objectives**

*Objective 1: Review the adequacy of controls for risks that have very low levels of controls in place, but were not originally identified by compliance officers as being significant risks in the 2019 compliance risk assessment.*

The UTM Institutional Compliance Committee has identified and reviewed 374 risks in 72 compliance areas with low controls that were not originally identified as significant by the compliance officers. Committee members are working with the compliance officers to either document the justification for the low levels of control or develop risk mitigation plans to strengthen controls. [Note: UTM has fully implemented all risk mitigation plans that were developed to address significant risks originally identified in the 2019 risk assessment.]

*Objective 2: Establish campus-level guidelines and procedures as required by University policies.*

UTM management is reviewing the UTM procedures that are approaching a two-year review deadline.

*Objective 3: Communicate the assignment of responsibility for regulations up the full chain of command.*

The UTM Institutional Compliance Committee plans to communicate the assignment of responsibility for regulations to all supervisors in the chain of command in fall 2020.

*Objective 4: Implement a feedback loop for monitoring the effectiveness of the compliance program.*

The UTM Institutional Compliance Committee has identified the key stakeholders (compliance officers, compliance officer supervisors, committee members, and executive management). Feedback has been collected from all key stakeholders except for the direct supervisors of compliance officers, who will be surveyed in 2020.

*Objective 5: The UTM Institutional Compliance Committee will communicate compliance issues and priorities to UTM executive management for their verification of the risks and obtain their input on strategic priorities.*

The UTM Institutional Compliance Committee Chair and UT System Administration Institutional Compliance representatives will present the results of the review of risks with low controls to the Chancellor's Cabinet in fall 2020 for their verification and prioritization.

*Objective 6: Address the issue of mandatory compliance training for the campus.*

In February 2020, the UTM Institutional Compliance Committee reviewed mandatory compliance training at UTM. Beginning March 24, 2020, UTM required employees to complete the Code of Conduct training by April 30, 2020. In addition, UTM personnel are participating in the System-wide Training Advisory Group, which is addressing compliance training.

## Campus/Institute Risks and Risk Mitigation Plans

## Attachment

### UT Health Science Center (UTHSC)

#### UTHSC Institutional Compliance Committee 2020 Objectives

*Objective 1: Begin assigning subject matter experts (SMEs) for the next UTHSC risk assessment. (Completed July 2019).*

This is the first step for the next campus-wide risk assessment for UTHSC. This risk assessment will focus more on “assigning responsibility” for laws/regulations as outlined in the Federal Sentencing Guidelines.

*Objective 2: Finalize 2019 Risk Assessment and prioritize which risks need to be addressed first. (Completed December 2019).*

The 2019 Risk Assessment was finalized for the December 2019 meeting. A few minor changes were made. Primarily, the “consequence” scores were adjusted to accurately reflect the corresponding risk’s potential impact. Nearly every risk consequence was given a “5” (the maximum score), so these were generally lowered 1-2 points for the final risk assessment.

*Objective 3: Create risk mitigation plans to address “high” risks from 2019 Risk Assessment. (Completed March 2020.)*

The risk mitigation plan process was discussed at the December 2019 Institutional Compliance Committee (“ICC”) meeting. Out of the 30 risks on the 2019 Risk Assessment, 7 of them scored high enough to warrant risk mitigation plans (“RMPs”). Members were asked to have draft plans ready for the March 2020 meeting. At the March meeting, the ICC voted to approve the mitigation plans to be implemented by each area/department. The ICC will follow up on the RMPs and gauge their progress at the next ICC meeting in June 2020. The areas for the RMPs are listed below.

Area	High Risk Plans	Total Plans	Plans Implemented	Plans Yet to be Implemented
Academic/Student Affairs	0	0	0	0
Safety	0	0	0	0
Finance and Operations	4	4	4	0
Research	2	2	2	0
ITS	0	0	0	0
Campus Police	0	0	0	0
Human Resources/OED	1	1	1	0
Library Services	0	0	0	0
<b>Total</b>	<b>7</b>	<b>7</b>	<b>7</b>	<b>0</b>

*Objective 4: Review and approve all compliance training modules and coordinate the campus wide roll out. (Ongoing process.)*

Creating a better process for coordinating training on the UTHSC campus is a primary goal for the ICC in 2020. With an ever-increasing amount of mandatory campus wide training, it’s become apparent that there is a great need for better coordination. Especially when scheduling the launch and due dates for required training.

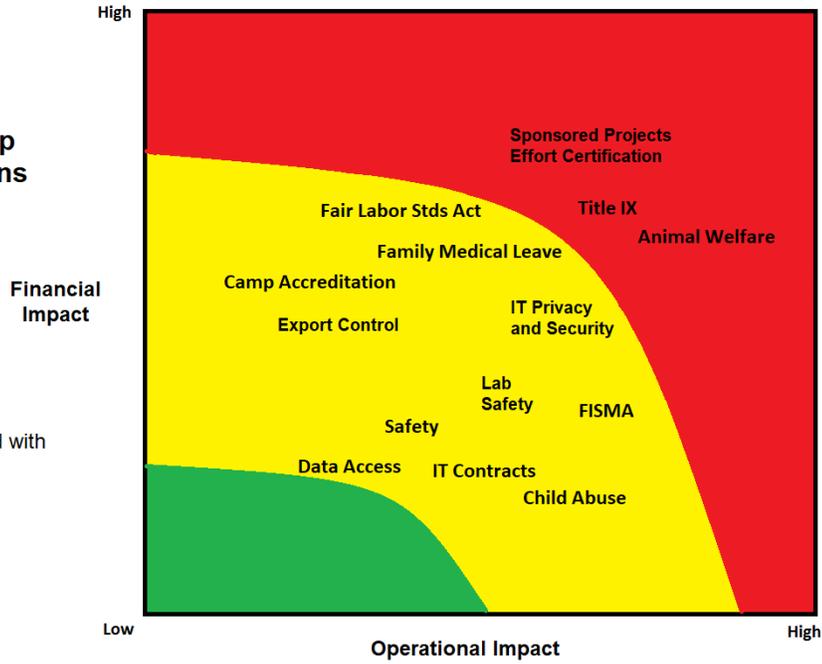
Campus/Institute Risks and Risk Mitigation Plans

Attachment

UT Institute of Agriculture

Residual Risk Heat Map for Risk Mitigation Plans

These are the areas of concern being addressed with risk mitigation plans.



Administrative Area	Compliance Area	Plans in Progress	Plans Implemented
4-H	Camp Accreditation	1	
Human Resources	Child Abuse	1	
	Fair Labor Standards Act	1	
	Family Medical Leave		1
	Title IX	1	
Information Technology	FISMA	1	
	IT Contracts		1
	IT Privacy/Security	1	1
Research	Animal Welfare		1
	Data Access	1	
	Export Control	1	
	Sponsored Projects- Effort Certification	3	1
Safety	General Safety	11	
	Lab Safety	1	
	<b>Total</b>	23	5

## Campus/Institute Risks and Risk Mitigation Plans

## Attachment

### UT Institute of Agriculture (UTIA)

#### UTIA Institutional Compliance Committee 2020 Objectives

*Objective 1: Monitor the progress of the risk mitigation plans.*

Five of the 28 plans to improve controls have been fully implemented. Three plans have been implemented in 2020 in the following areas.

1. Family Medical Leave- Process developed for distributing information to leadership.
2. IT physical protection of personal information- Improved procedures for identifying personal information.
3. Animal welfare- Improved procedures for disseminating policies to animal users.

*Objective 2: Communicate compliance issues and priorities to UTIA executive management for their verification of the risks and obtain their input on strategic priorities.*

The UTIA Institutional Compliance Committee and UT System Administration Institutional Compliance representatives will take steps to engage UTIA executive management in verifying and prioritizing the risks identified in the UTIA comprehensive compliance risk assessment.

*Objective 3: Implement a feedback loop for monitoring the effectiveness of the compliance program.*

The UTIA Institutional Compliance Committee has identified the key stakeholders (compliance officers, compliance officer supervisors, committee members, and executive management). The UTIA Institutional Compliance Committee members were surveyed in January 2020. Feedback has now been collected from all key stakeholders except for compliance officer supervisors, who will be surveyed later in 2020.

# Campus/Institute Risks and Risk Mitigation Plans

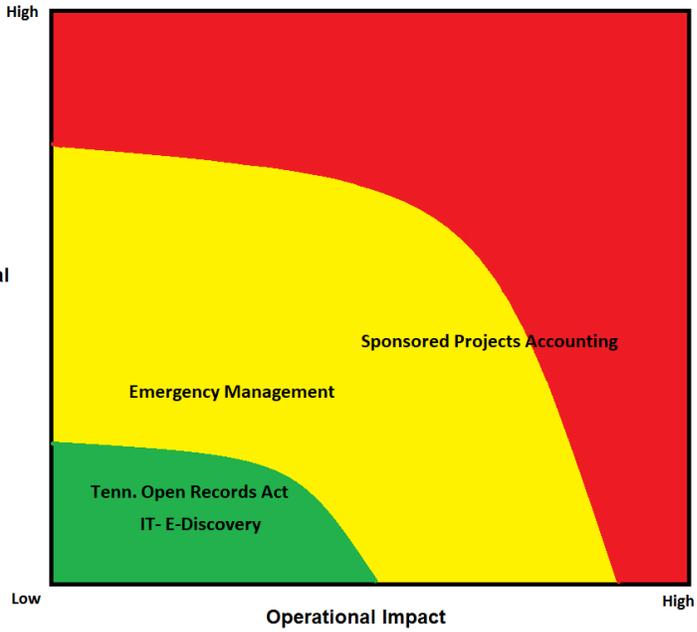
# Attachment

## Institute for Public Service

### Compliance Residual Risk Heat Map for Plans of Action

Financial Impact

These are the areas of concern being addressed with plans of action.



Administrative Area	Compliance Area	Plans in Progress	Plans Implemented
Research	Sponsored Projects Accounting	3	
Information Technology	E-Discovery		1
Human Resources	Emergency Management		1
IPS Administration	Tennessee Open Records Act		1
	<b>Total</b>	3	3

## Campus/Institute Risks and Risk Mitigation Plans

## Attachment

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### Institute of Public Service (IPS)

#### IPS Institutional Compliance Committee 2020 Objectives

*Objective 1: Monitor the implementation of risk mitigation plans.*

Three of six risk mitigation plans have been completed. The three remaining plans regarding sponsored projects accounting involve implementing improved training for principle investigators. The IPS work team has reviewed UTK training materials and plans to modify them for IPS use and deliver the training through the K@TE learning management system.

*Objective 2: Integrate the new Tennessee Language Center (TLC) into the institutional compliance program.*

The TLC management team has received an orientation on the UT Institutional Compliance Program. In 2020, TLC identified applicable regulations and assigned TLC compliance officers.

*Objective 3: Implement a feedback loop for monitoring the effectiveness of the compliance program.*

The IPS Institutional Compliance Committee has identified key stakeholders and the appropriate methodology for collecting feedback. The IPS Institutional Compliance Committee members were surveyed in January 2020. Feedback has now been collected from all key stakeholders except for compliance officer supervisors, who will be surveyed later in 2020.

*Objective 4: The IPS Institutional Compliance Committee will communicate compliance issues and priorities to IPS executive management for their verification of the risks and obtain their input on strategic priorities.*

The IPS Institutional Compliance Committee and UT System Administration Institutional Compliance representatives will take steps to engage IPS executive management in verifying and prioritizing the risks that are being addressed with the remaining risk mitigation plans in progress and any new risks that are identified.

Campus/Institute Risks and Risk Mitigation Plans

Attachment

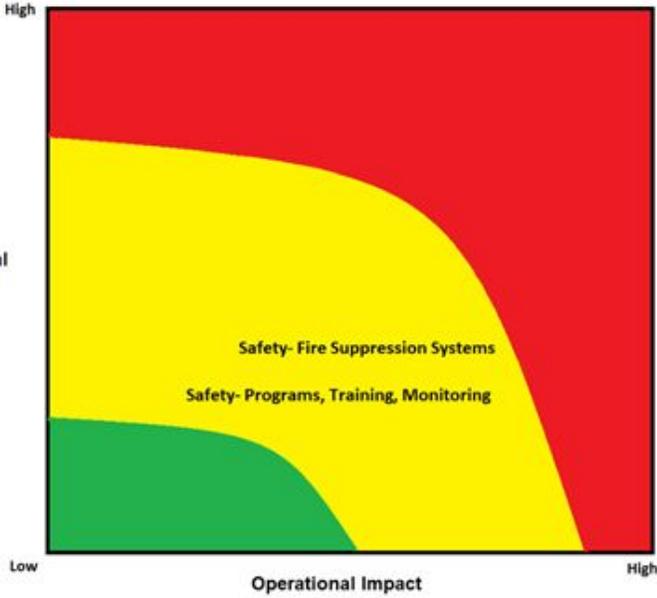
UT Space Institute

Compliance Residual Risk Heat Map for Plans of Action

Financial Impact

These are the areas of concern being addressed with plans of action.

UTSI Compliance Residual Risk Heat Map for Plans of Action



Administrative Area	Compliance Area	Plans in Progress	Plans Implemented
Safety	Fire Suppression Systems		1
	Programs, Training, Monitoring	2	1
	<b>Total</b>	2	2

## Campus/Institute Risks and Risk Mitigation Plans

## Attachment

### UT Space Institute (UTSI)

#### UTSI Institutional Compliance Committee 2020 Objectives

*Objective 1: Track implementation of risk mitigation plans.*

Two of the four plans to improve controls have been implemented. The remaining plans concern safety training and written safety plans.

*Objective 2: Establish campus-level guidelines and procedures as required by University policies.*

The UTSI Institutional Compliance Committee is working to establish campus-level guidelines and procedures where required by University policies. The following areas have completed their procedures:

- Human Resources
- Information Technology

*Objective 3: Address the issue of mandatory compliance training for the campus.*

The UTSI Institutional Compliance Committee plans to coordinate a review of the mandatory training issues with the policy gap analysis.

*Objective 4: Communicate the assignment of responsibility for regulations up the full chain of command.*

The UTSI Institutional Compliance Committee has identified the supervisors of compliance officers in 2020 and plans to communicate the assignment of responsibility for regulations up the full chain of command in 2020.

*Objective 5: Implement a feedback loop for monitoring the effectiveness of the compliance program.*

The UTSI Institutional Compliance Committee reviewed the results of the 2019 survey of UTSI Institutional Compliance Committee members and did not have any changes to the current process. Feedback has now been collected from all key stakeholders except for compliance officer supervisors, who will be surveyed later in 2020.

*Objective 6: The UTSI Institutional Compliance Committee will communicate compliance issues and priorities to UTSI executive management for their verification of the risks and obtain their input on strategic priorities.*

The UTSI Institutional Compliance Committee Chair and UT System Administration Institutional Compliance representatives plans to communicate the progress of the risk mitigation plans to the UTSI executive director in fall 2020.

**THE UNIVERSITY OF TENNESSEE**  
**OUTSTANDING AUDIT ISSUES**  
 As of March 31, 2020

Audit	Issue*	Report Date	Estimated Implementation Date	Revised Implementation Date	Status
System Phishing Security Controls	Workstation Administrative Access	11/30/2017	7/2/2018	6/30/2020	1
System IT Security Policy Compliance	Application System Security Plans	12/10/2018	6/28/2019	3/2/2020	1
UTK Research Compliance Data Analytics	Tracking and Reporting Noncompliance	6/6/2019	8/1/2019	1/31/2020	1
UTK Banner Interface Security Audit	Interface Strategy and Design	7/25/2019	2/28/2020	N/A	2
System General & Application Controls (K@TE)	System Administrator Authentication	11/18/2019	6/1/2020	N/A	2
UTM Camp Administration Processes	Cash Receipts for Unidentified Campers	11/21/2019	8/31/2020	N/A	2
UTK Division of Student Life IT Security	Division IT Security Program Plan	3/24/2020	6/30/2020	N/A	2
UTK Division of Student Life IT Security	Privileged Accounts	3/24/2020	6/30/2020	N/A	2
UTK Department of Theatre IT Security	Vulnerability Management Plan	2/10/2020	9/1/2020	N/A	2
UTK Department of Theatre IT Security	Configuration Management	2/10/2020	9/1/2020	N/A	2
UTK Department of Theatre IT Security	Risk Assessment	2/10/2020	9/1/2020	N/A	2
UTK Department of Theatre IT Security	Information Security Plans	2/10/2020	9/1/2020	N/A	2
UTK Department of Theatre IT Security	Contingency Plan	2/10/2020	9/1/2020	N/A	2
UTK Division of Student Life IT Security	Application Security Plan	3/24/2020	12/31/2020	N/A	2

\*This report contains issues auditors considered high risk.

Status

- 1 For projects with estimated implementation dates before or on March 31, 2020, auditors have discussed with management all actions taken thus far, determined that satisfactory progress toward implementing agreed-upon action plans has been made, and identified a revised implementation date and/or a time for auditors to follow up for verification that the issue has been satisfactorily addressed.
- 2 Auditors will follow up with management soon after the estimated implementation date to confirm status.

### Summary of Outstanding Audit Issues

The table below shows high-risk audit issue activity from December 31, 2019 (as reported in the February 3<sup>rd</sup> Audit and Compliance Committee meeting) through March 31, 2020:

<b>Time Period</b>	<b>Number of Issues</b>
Outstanding Audit Issues as of December 31, 2019	<b>8</b>
Issues Added as of March 31, 2020	<b>8</b>
Issues Implemented from December 31 through March 31, 2020	<b>2</b>
Remaining Outstanding Audit Issues as of March 31, 2020	<b>14</b>



THE UNIVERSITY OF TENNESSEE SYSTEM

FINANCE AND ADMINISTRATION

DAVID L. MILLER

*Senior Vice President and Chief Financial Officer*

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**MEMORANDUM**

**TO:** Audit and Compliance Committee  
Mr. John Compton, Chair of the Board of Trustees  
Ms. Amy Miles, Chair, Audit and Compliance Committee  
Mr. Bill Rhodes, Chair, Finance and Administration Committee

**FROM:** Mr. David Miller

**DATE:** April 28, 2020

**SUBJECT:** Travel Exception Report

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The Board of Trustees's policy on travel requires the university to report to the Audit and Compliance Committee any travel exceptions approved on behalf of the President, employees in the President's Office, senior-level administrators, or the Sr. Vice President and Chief Financial Officer. For the quarter, ended March 31, 2020, there were no exceptions requested or approved in accordance with the Board's policy.

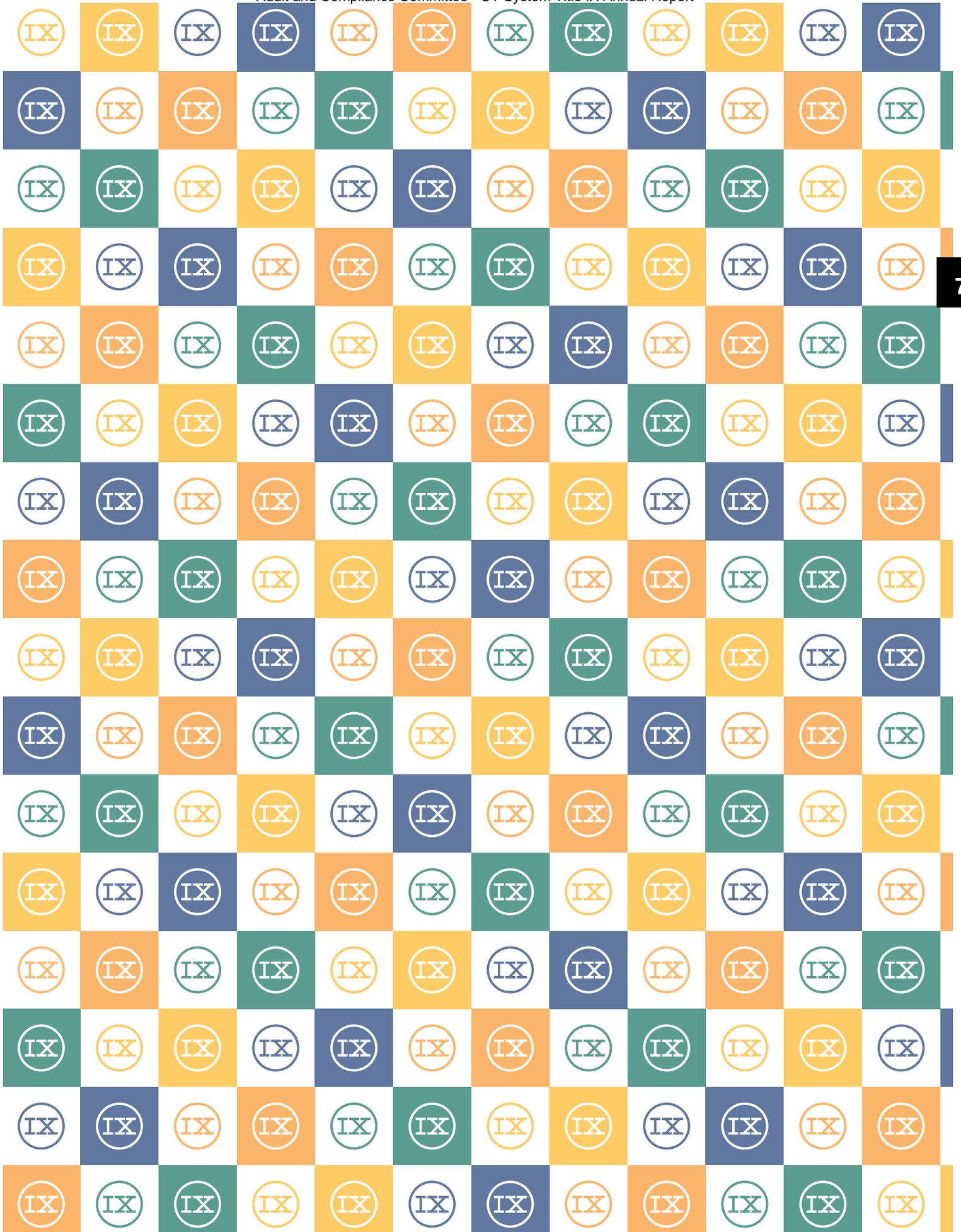
If you have any questions, please let me know.

c: Mr. Randy Boyd  
Mr. Brian Daniels  
Ms. Cindy Moore  
Mr. Mark Paganelli



**UT SYSTEM**  
OFFICE OF TITLE IX

**2020 Report**



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An electronic version of this report  
can be accessed online:

**[titleix.tennessee.edu](http://titleix.tennessee.edu)**

## INTRODUCTION

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*“No person in the United States shall, on the basis of sex, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any education program or activity receiving federal financial assistance.”*

Title IX of the Education Amendments of 1972

While the landscape of higher education is changing rapidly, one factor remains critical to student success – access. The mission of Title IX and this Office play a crucial role in ensuring educational access at the University. Individuals who experience sexual misconduct, relationship violence or stalking can access resources and support on their campus. Additionally, reporting and investigation options are available to respond to and resolve allegations of misconduct.

The Office of Title IX remains committed to supporting each campus across the state as they create and maintain a safe and non-discriminatory learning, living, and working environment. As we look back on the year in review, we are proud of the strides we made in fulfilling this goal. The campus Title IX Coordinators worked with the Office of Title IX to develop new ways to collect and communicate Title IX-related data. They challenged the way we educate and spread awareness in our communities to improve prevention and reporting. Lastly, their contributions to creating a more streamlined policy will bring consistency and efficiency across the System. As we look towards the year ahead, we will work even harder to support our campuses through our Title IX commitment. We will use our experiences and evaluations to better align our policies, innovate in prevention and education, enhance support and interim measures, excel in investigations and resolutions, and seek out patterns and trends.

As Title IX regulations continue to evolve, so will the work of this Office. We will continue to collaborate as One UT to meet our mission of education, outreach, and public service.

## Our Mission

Our mission is to serve the University of Tennessee community through our comprehensive Title IX Commitment of ensuring access to education.

## Our History

Since the comprehensive federal law known as Title IX was enacted in 1972, the University of Tennessee has worked to ensure its compliance. Each campus and institute has established systems, policies and processes that have evolved over time with additional federal guidance and court rulings. As expectations for higher education have grown, the University has worked both proactively and responsively to meet those expectations.

In September 2016, then UT President Joe DiPietro appointed an independent commission to review and address Title IX compliance across the UT System. The commission acted with full authority to access and review existing programs and resources. Information gathered by the commission was released in June 2017 with observations and recommendations. This report was reviewed by the president, chancellors, general counsel, and others to ensure effective implementation of selected enhancements. The report made five major recommendations:

- *Creation of a system-wide Title IX coordinating presence*
- *Campus Title IX staffing and resource enhancements*
- *Policy, grievance procedure, and Student Code of Conduct updates and modifications*
- *Case management and care and support enhancements*
- *Enhanced education, prevention, and training*
- *In response to these suggestions, UT established a central Title IX compliance coordination function in August 2017.*

## Our Model

Utilizing the commission’s report, national benchmarking and current research, the University of Tennessee has identified our Title IX commitment. Grounded in the Social Ecological Model, the University’s Title IX commitment emphasizes five key areas:

1. **Policy:** Our foundation is in the policy and procedures we follow.
2. **Prevention & Education:** Our goal is to prevent sexual misconduct, relationship violence, stalking and retaliation before they happen.
3. **Support & Interim Measures:** Our promise is to provide support and appropriate interim measures to individuals involved in the Title IX process.
4. **Investigation & Resolution:** Our commitments to due process, campus safety and encouraging reporting guide how we investigate and resolve reports.
5. **Patterns & Trends:** Our responsibility is to use the best available research, evidence-based practice and our own campus and institute trends in our prevention and response efforts.



## OUR WORK

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### Compliance and Evaluation

The University is engaged in an ongoing effort to improve its Title IX compliance activities. The Title IX coordinator implements and uses a collaborative and proactive approach to seeking continuous improvement. Through identifying opportunities for improvement, implementing a plan for change and analyzing results and measuring success, the Office of Title IX supports the utilization of best practices throughout the UT system.

The Office of Title IX continues to support system-wide Title IX compliance through the following on-going and completed objectives:



- i. Facilitated **scenario-based exercises** with campus Title IX teams to clarify roles and responsibilities and troubleshoot problem areas.
- ii. Provided **in-person system Title IX training** to UT Board of Trustees, UT Board Audit and Compliance Committee, UT President’s Cabinet, UT Martin Advisory Board, UT Knoxville Chancellor’s staff, UT Audit and Compliance staff, and UT Space Institute leadership.
- iii. Utilized **K@TE learning management system** for mandatory trainings
- iv. Streamlined **reports to campus leadership** and developed internal quarterly reports to track Title IX-related data and patterns and trends across the System
- v. Standardized the collection of Title IX data across the System to **ensure internally consistent compliance** assessments and evaluations
- vi. Collaborated with campus Title IX coordinators to streamline Title IX policy to better align definitions, timelines and procedures
- vii. Facilitated campus collaborations between Title IX offices and other campus safety stakeholders
- viii. Provided support to the UT System and campuses during the state performance audit

In the spring of 2019, UT developed a standard format for reporting and tracking Title IX-related data across the System. Campus Title IX coordinators worked with the System Title IX office to identify what type of sexual misconduct-related data would be useful to track and how best to streamline the collection of this information. During the summer and fall of 2019, campus Title IX coordinators regularly reported this data to the System and campus leadership, enhancing the University's overall ability to identify themes, observe trends and respond accordingly.

## Policies and Procedures

The University's Title IX related policies provide guidance for specific activities and transactions so that the institution acts in accordance with applicable laws, and in a way that supports the mission and core values of the University.

Each campus has developed a policy to outline the rights and responsibilities of faculty, staff and students as they pertain to Title IX. Complaints regarding discrimination based on sex will be addressed following the campus' discrimination complaint policy and procedure.

Campus policies and procedures can be accessed via the following links:

- *University of Tennessee, Knoxville / Institute of Agriculture / Institute for Public Service / UT System*
- *University of Tennessee at Chattanooga*
- *University of Tennessee at Martin*
- *University of Tennessee Health Science Center*
- *University of Tennessee Space Institute*

In addition to the policies referenced above, the University's Chattanooga and Knoxville campuses have dedicated Student Pregnancy Accommodations policies. The policies can be found online:

- *UTK - Student Pregnancy Accommodations*
- *UTC - Student Pregnancy Accommodations*

Our Work

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During the summer of 2019, UT began streamlining Title IX sexual misconduct policies across the System. The purpose of this objective was to develop common, consistent practices and standards in response to reports of sexual misconduct across the UT System. To ensure compliance under Title IX, campuses also aligned their policies with requirements from the Department of Education and other applicable guidance and regulations.

Throughout the year, campus Title IX coordinators worked with the System Title IX office to review, evaluate and provide feedback on how to better align campus policies and balanced consistency with flexibility to accommodate campus preferences and needs. Overall, this initiative will enhance systemwide Title IX data collection, communication and process management. This objective is ongoing as each campus continues to work on streamlining and finalizing their policies.

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## PREVENTION & EDUCATION



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In April of 2019, the Secretaries of the Navy, Army, and Air Force hosted a “National Discussion on Sexual Assault and Sexual Harassment at America’s Colleges, Universities, and Service Academies” on at the U.S. Naval Academy in Annapolis, Maryland. The two-day discussion showcased prevention programs and innovative research from experts across the country with a focus on healthy relationships; prevention; innovative approaches; evaluation; culture/climate and leadership; and gender specific considerations. The University of Tennessee presented, “Using the Social Ecological Model to Change the Statistics.”

The presentation was based on the Center for Disease Control’s model which considers the complex interplay between individual, relationship, community, and societal factors. The University was honored to present, but more importantly had the opportunity to learn from and engage with colleagues across the military and civilian landscape of this work.

In his opening remarks, the Secretary of the Navy Richard V. Spencer emphasized his commitment, “Students of today are tomorrow’s leaders who trust us to provide a safe and supportive learning environment. Sexual Assault and sexual harassment undermine this idea. to presidents, chancellors, provosts, vice presidents, deans, Title IX coordinators, and other administrators with a role in preventing and responding to campus.

The Social-Ecological Model: A Framework for Prevention: Centers for Disease Control<sup>1</sup>

<sup>1</sup> <https://www.cdc.gov/violenceprevention/publichealthissue/social-ecologicalmodel.html>

Prevention & Education - Campuses



*Hike the Hill in Heels event*



*National Academies of Sciences, Engineering and Medicine Logomark*

## UT KNOXVILLE

The University of Tennessee, Knoxville aligns with the System Title IX models with an emphasis on cross campus collaborations and teamwork to improve prevention and increase reporting. This year marks the sixth year that UT Knoxville has published an annual report for the campus. The UT Knoxville annual report has become a commitment in transparency and a call to action for faculty, staff and students on how to be part of the solution. In 2019, we engaged with our campus community in new ways. All housing staff, from office assistants to hall directors, received training on our policy, procedure and prevention.

Peer mentors and student orientation leaders learned how to be active bystanders and to train new Vols to be active bystanders. In collaboration with our campus partners, including the UT Police Department, the Office of Student Conduct and Community Standards, UT Athletics and the Center for Health Education and Wellness, we facilitated 100 programs (2,073 participants), 56 campus wide events (6,190 participants), and trained over 22,000 faculty, staff and students in person and online.

**For a second year in a row**, our faculty and staff had a 99 percent completion rate for mandatory reporter training to ensure that everyone, inside and outside the classroom, is prepared to connect to support resources and reporting options. UT Knoxville through partnerships across campus is working to create a system of consistent and holistic support in which every member of our community has a vital role to play.

### **National Engagement Highlight: Action Collaborative on Preventing Sexual Harassment in Higher Education**

In 2019, UT Knoxville became a founding member of a nationwide Action Collaborative on Preventing Sexual Harassment in Higher Education. This group of committed academic institutions and other key stakeholders is guided and convened by the National Academies of Science, Engineering and Medicine (NASEM) to develop new strategies and share innovative ideas for preventing and addressing sexual harassment and gender discrimination. UT is the only large public institution in the Southeast to be a member of the collaborative. A 2018 NASEM report concluded that existing systems for addressing sexual harassment have placed the burden on targets, victims and survivors, and have been ineffective in preventing harassment in academic institutions.

#### **In light of those findings, the Action Collaborative developed four primary goals:**

- *Raise awareness about sexual harassment, its consequences and approaches for addressing and preventing it*
- *Share and elevate evidence-based policies and strategies for reducing and preventing sexual harassment*
- *Contribute to setting a shared research agenda for this work, and gather and apply research results across institutions*
- *Develop a standard for measuring progress toward reducing and preventing sexual harassment in higher education. Members exchange ideas and information as they work to provide learning environments and workplaces free from harassment for students, faculty and staff.*

In 2019, UT Knoxville participated in two national meetings and served on a panel at the Action Collaborative Public Summit held in Seattle. In addition, UT Knoxville served as a resource for other member organizations on the creation of a Title IX annual report. UT Knoxville's report is being held up by other academic institutions as a model to follow for their own campus reporting. UT Knoxville has also formed its own campus action collaborative to guide the University in addressing the underlying issues that allow sexual harassment to persist in the academic environment, mirroring the national focus on prevention, response, remediation and evaluation.

**The collaborative working group is composed of representatives from across the campus:**

- *A representative of each college, appointed by their respective dean to a three-year term*
- *A representative of the Student Government Association, Graduate Student Senate and Faculty Senate, appointed annually by their respective group*
- *A representative of human resources, the Office of the Provost, the Graduate School, the Office of Title IX and the Office of Equity and Diversity, appointed by their respective office to a three-year term*
- *A chair, appointed by the chancellor to a three-year term (2019–22 Membership)*

Brad Areheart, associate professor, College of Law; Ashley Blamey (chair), Title IX coordinator; Laura Bryant, deputy Title IX coordinator for prevention, training, and evaluation; Natalie Campbell, president, Student Government Association; Melissa Cardon, Nestle professor of entrepreneurship and innovation, Haslam College of Business; Megan Haselschwerdt, assistant professor, College of Education, Health, and Human Sciences; Mary Lucal, associate vice chancellor for human resources; Kim Newkirk, associate professor, College of Veterinary Medicine; Jenny Richter, associate vice chancellor and director of the Office of Equity and Diversity; Patricia Roberson, assistant professor, College of Nursing; Dixie Thompson, vice provost and dean of the Graduate School; Phyllis Thompson, clinical associate professor, College of Social Work; Paul Frymier, associate dean, College of Engineering; Deb Welsh, head, Department of Psychology, College of Arts and Sciences; Erin Whiteside, associate professor, College of Communication and Information; David Willis, president, Graduate Student Senate; Lisa Yamagata Lynch; Ombudsperson John Zomchick, vice provost for faculty affairs

## UT CHATTANOOGA

The University of Tennessee at Chattanooga's Title IX team focuses on prevention, education and response. Response efforts are led by a collaborative committee, the Sexual Misconduct, Relationship Violence and Stalking Response Team, which is chaired by UT Chattanooga's Title IX Coordinator Stephanie Rowland. Offices represented include student conduct; student outreach and support; dean of Students, Survivor Advocacy Services, Equity and Inclusion; and the Disability Resource Center. The group works together to ensure that incident response is timely, effective and supportive for the students involved.

Awareness and prevention efforts are overseen by the Sexual Misconduct, Relationship Violence and Stalking Prevention Committee, which is comprised of a myriad of offices across UT Chattanooga's campus. In 2019, UT Chattanooga's Center for Student Wellbeing hired an assistant director for education and prevention to take the lead on prevention efforts involving students. In-person programming for students increased in 2019, with consent workshops, healthy relationships education and increased offerings of StepUp! bystander intervention education.

**Consent T-shirt Giveaways:** UT Chattanooga's Title IX coordinator gave away 2,500 Obtained & Affirmative & Voluntary & Continual t-shirts and encouraged students to wear the shirts on Tuesdays to continue the conversation about consent. The t-shirts were distributed during education efforts geared toward key campus constituencies, including resident assistants, student-athletes, first-year experience students, ROTC students, new members of fraternities and sororities, Student Government Association, freshman senate and more. T-shirts were offered to the general student population during tabling events that took place the first six weeks of the fall 2019 semester.

**Consent Workshops:** The Center for Student Wellbeing's assistant director for education and prevention conducted seven in-person consent workshops during fall 2019. The "Consent Chats" program is mandatory for all resident assistants, and housing residents are encouraged to attend. The program includes interactive, engaging group exercises that explain verbal and nonverbal forms of consent and help students understand how to get consent.

**Intimate Partner Violence Awareness Events:** The assistant director for education and prevention held five intimate partner violence awareness events throughout the fall 2019 semester. In addition, two in-person healthy relationships workshops were held in order to teach students skills for healthy conflict resolution and healthy versus unhealthy relationship behaviors.

**Sexual Misconduct, Relationship Violence and Stalking Resources Education:** UT Chattanooga's Title IX coordinator held 88 in-person sessions that included information about available resources for students, faculty and staff. Trained individuals included student groups, academic departments and new employees.



*UTC Down with the Dean*



*UTC Ambassadors*

## UT MARTIN

**Prevention, Education, Training:** During 2019, the Title IX coordinator worked in conjunction with other University departments and offices in providing programs on the University's sexual misconduct policy. These programs were presented at various campus locations including residence halls, recreation facilities, athletic facilities, and others. Additionally, presentations were made to other University entities such as physical plant employees, faculty groups, fraternities and sororities, student government and athletic teams.

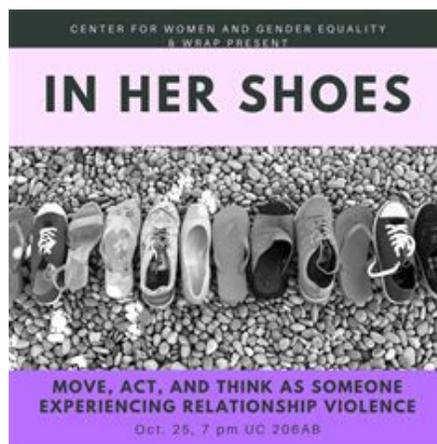
Prevention & Education - Campuses

In 2019, the University successfully trained all faculty and staff (approximately 800 University employees) who have been designated as mandatory reporters. Additionally, over 1,800 student groups received training on the sexual misconduct policy. These student groups included all incoming freshmen, PEP leaders, fraternity and sorority members, transfer students and student-athletes.

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*UTM Proclamation Signing*



*UTM Sexual Misconduct Awareness Event*

## UT HEALTH SCIENCE CENTER

Education and prevention, a primary focus, allows the Office of Equity and Diversity to foster an environment that is free from all forms of sex discrimination, sexual harassment, sexual abuse, sexual assault, dating violence, domestic violence and stalking. This includes promoting national campaigns like National Stalking Awareness Month, Sexual Assault Awareness Month and Domestic Violence Awareness Month. The Office of Equity and Diversity conducts biweekly in-person education during New Employee Orientation that covers the aforementioned topics, in addition to Title IV, Title VI, Title IX of the Education Amendment of 1972, and the American Disabilities Act and Section 504 of the Rehabilitation Act of 1973.



*UTHSC Goes Teal*

**UTHSC Goes Teal:** Title IX Coordinator Michael Alston and UT Health Science Center leadership wore teal neckties in support of the “Tie One On for National Sexual Assault Awareness Month” campaign. The campaign brings awareness to the relationship between alcohol use and sexual assault perpetration. The photo event was a precursor to a collaborative event with students.

**Sexual Assault Awareness Month:**

The Office of Equity and Diversity, in collaboration with Student Academic Support Services and Inclusion (SASSI) counselors, educated over 50 students, faculty and staff in a program titled “No Is A Complete Sentence: The Intersection of Sexual Assault and Substance Abuse.” The Office of Student Academic Support Services and Inclusion provides free counseling and other support services to students at the UT Health Science Center. The licensed counselors within SASSI are designated within the University’s sexual misconduct, relationship violence, stalking and retaliation policy as confidential resources, meaning the information shared therein cannot be revealed to any other party without the express permission of the individual.



*Sexual Assault Lunch and Learn*



*UTHSC Wear Purple Day*

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**Wear Purple Day:** On Oct. 24, the UT Health Science Center wore purple in observance of National Domestic Violence Awareness Month.

**Interactive Safety Training:** The Office of Equity and Diversity, in collaboration with campus police, presented an Interactive Safety Training based on the game of Life. The training covered topics ranging from the cycle of violence, domestic violence victim to offender relationships, police response, prosecution and protection orders.

## UT SPACE INSTITUTE

Prevention, education and training are the cornerstones of the UT Space Institute’s efforts to create a safe and supportive climate for all. The UT Space Institute Office of Human Resources and Equity and Diversity offered training on policy and mandatory reporter responsibilities for all new employee and faculty orientation sessions.

Workshops for existing faculty and staff included mandatory reporter responsibilities, sexual harassment awareness, Title IX compliance and gender discrimination. The safety, security and emergency management coordinator is developing supplemental training to occur year-round for personnel who may be designated primary contacts for sexual misconduct, relationship violence and stalking complaints.

This year, we conducted annual training on employment law updates that included discussion of Title IX. The UT Space Institute hosted a

Prevention & Education - Campuses

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one-day visit from the UT System Title IX Office for the purpose of discussing Title IX obligations with UTSI faculty, staff and students. The UT Space Institute executive team received the first briefing for the day.

The UT Space Institute supports a Multi-Cultural Advisory Committee that consists of representatives from faculty, staff and students and chaired by the equity and diversity officer. Discussions include sharing policies, procedures, updates and other anti-discriminatory regulations related to sexual misconduct, relationship violence, stalking, and retaliation and other related regulations.

The UT Space Institute participated in hosting a seminar at a local high school in October on "Suicide Prevention." Jaime Harper from the Tennessee Department of Mental Health and Substance Abuse Services was the guest speaker. The event was well attended with folks from all over the community including some attendees from UTSI.

Additionally, Andre Porter joined the UT Space Institute last fall as a graduate and professional studies recruiter. His position develops strategic recruitment initiatives for designated territories designed to attract competitive in-state and out-of-state graduate students for on ground and online programs. Porter also has prior experience in Title IX work.



*UTSI Fun Run-Walk*



*UTSI Graduation Ceremony*

## TITLE IX TEAM

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### Ashley Blamey

TITLE IX COORDINATOR  
UNIVERSITY OF TENNESSEE SYSTEM ADMINISTRATION AND  
UNIVERSITY OF TENNESSEE, KNOXVILLE

*ashleyblamey@utk.edu*

Ashley Blamey serves in a dual role as Title IX coordinator for the UT system and UT Knoxville.

Serving in both capacities, Blamey is able to facilitate critical communication between officials with UT system and all UT campuses. Enhanced communication and interaction across the University system enables more informed decision making and evaluation of practices by all UT campuses.

As system-level coordinator, Blamey is responsible for tracking best practices and legal developments; collaborating with other UT Title IX officials in policy evaluation and development; measuring program effectiveness; identifying optimal training, prevention and awareness-building efforts and resources for implementation; and overseeing annual reporting on the frequency and nature of incidents and complaints.

As UT Knoxville coordinator, Blamey is responsible for coordinating campus efforts to comply with and carry out Title IX responsibilities including promptly, thoroughly and equitably investigating and resolving reports of prohibited conduct to eliminate prohibited conduct, prevent its recurrence and remedy its effects.

Blamey has a bachelor's degree in special education from East Tennessee State University and both master's and doctoral degrees in social work from UT Knoxville. She joined UT Knoxville in 2008 as its inaugural student case management specialist. She has served the campus as the Director for the Center for Health Education and Wellness and Assistant Vice Chancellor for Student Life. Blamey is currently the University's representative on the National Academies of Sciences, Engineering, and Medicine Action Collaborative to prevent sexual harassment in Higher Education. Under her leadership, UT Knoxville was awarded a grant from the U.S. Department of Justice to develop best practices related to education about and prevention of sexual assault, domestic violence, dating violence and stalking.



Title IX Team

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## Christina Moradian

DEPUTY TITLE IX COORDINATOR  
UNIVERSITY OF TENNESSEE SYSTEM ADMINISTRATION

*christinam@tennessee.edu*



Christina Moradian joined the University of Tennessee in 2019 as the deputy system Title IX coordinator. Moradian’s role provides a dedicated System employee to support tracking legal developments, collaborating with other UT Title IX officials in policy evaluation and development, providing investigative support and serving as a resource for UT System Title IX compliance. She also supports UT Systemwide Title IX efforts to become a national model in Title IX compliance.

Moradian is a licensed Tennessee attorney and a member of the National Association of College and University Attorneys. She is also a certified Equal Employment Opportunity investigator and holds a Society for Human Resources Management Certified Professional designation.

Christina received a bachelor’s in Spanish literature from The University of the South, Sewanee and earned a juris doctor degree from UT Knoxville.

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Title IX Team

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## Stephanie Wood Rowland

TITLE IX COORDINATOR  
UNIVERSITY OF TENNESSEE AT CHATTANOOGA  
*stephanie-rowland@utc.edu*



Stephanie Rowland became Title IX coordinator at UT Chattanooga in March 2015 and, at the same time, the first full-time Title IX coordinator within the UT system.

Rowland’s work has focused on prevention, mandatory reporter education and on developing campus processes and structures to ensure that complainants and respondents are supported throughout the Title IX student conduct process. Prior to joining UT Chattanooga, Rowland was director of student conduct and integrity and Title IX coordinator at Longwood University in Farmville, Virginia. She has also served as a deputy county attorney for Pima County, Arizona.

Rowland has a bachelor’s degree from Virginia Tech and a law degree from the University of Arizona. She is licensed to practice law in Arizona, Ohio and Virginia.

## Joe Henderson

TITLE IX COORDINATOR AND DIRECTOR OF THE OFFICE OF EQUITY & DIVERSITY  
UNIVERSITY OF TENNESSEE AT MARTIN  
*jhende33@utm.edu*



Joe Henderson currently serves as the Title IX coordinator and director of the office of equity and diversity at UT Martin. He came to UT Martin in 2009 as the student conduct coordinator. He previously served as a public safety officer and accreditation manager at East Tennessee State University, the support services manager for the City of Greenville Texas Police Department and a sergeant for Dallas Police Department. He holds a bachelor’s degree from East Texas State University (Texas A&M-Commerce) and has served as the interim equity and diversity officer at UT Martin since August 2015.

In addition to his current roles, Henderson also serves as the Title VI coordinator and the affirmative action officer. He also investigates all grievances and complaints, oversees all faculty and high-level administrative searches, and serves on the System’s Diversity Advisory Council.

Title IX Team

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## Michael Alston

TITLE IX COORDINATOR AND ASSISTANT VICE CHANCELLOR, EQUITY & DIVERSITY  
UNIVERSITY OF TENNESSEE HEALTH SCIENCE CENTER

*malston1@uthsc.edu*

Michael Alston has been on staff with the UT System for over 30 years. Alston began his career with the UT System in August of 1989 with stints at UT Martin, UT Knoxville and the UT Health Science Center in Memphis, where he is now the assistant vice chancellor for equity and diversity, chief diversity officer, and Title IX coordinator.

His experience in higher education encompasses residence life administration at UT Martin, student recruitment and admissions with UT Martin and UT Knoxville and undergraduate instruction outside the UT System at State Technical Institute and Southwest Tennessee Community College, both located in Memphis. At UTHSC, he worked in employee relations, student conduct administration and equity and diversity.

Alston has a bachelor's degree in psychology with a minor in business management, and a master's degree in educational psychology with a higher education focus, both from UT Martin. He has a doctorate in leadership with a concentration in higher education administration from Peabody College at Vanderbilt University. He has a professional certification in diversity management from the School of Industrial and Labor Relations at Cornell University.



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Title IX Team

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## Patricia Burks-Jelks

TITLE IX COORDINATOR AND DIRECTOR FOR EQUITY & DIVERSITY  
UNIVERSITY OF TENNESSEE SPACE INSTITUTE

*pjelks@utk.edu*



Patricia Burks-Jelks has been with the UT Space Institute in Tullahoma for more than 30 years. She is the director of human resources and the campus equity and diversity officer, which encompasses serving as Americans with Disabilities Act coordinator and Title IX coordinator.

Burks-Jelks has a bachelor’s degree in social work and a master’s degree in professional studies, both from Middle Tennessee State University. She is also a graduate of the UT Leadership Institute.

Burks-Jelks is president-elect of Women in Higher Education in Tennessee, which has presented her with its “June Anderson Award” for “outstanding contributions in promoting equality for women in higher education.”

She is also past president of the Highland Rim Chapter of the national Society for Human Resource Management and a past president of the Tennessee Chapter of the College and University Professional Association (CUPA-HR) for human resources. As state of Tennessee president, Burks- Jelks received the “Meritorious Service Award” from Southern Region CUPA-HR for her leadership and in recognition of her pioneering role as the Tennessee chapter’s first African American president.

In her community, Burks-Jelks serves as chair of the Franklin County Faith Based Recovery Coalition and president of The Business and Professional Women’s Federation.

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*"Everywhere you look, UT"  
grain bin in Sharon, TN.*

To learn more or become involved with our work visit:  
[titleix.tennessee.edu](https://titleix.tennessee.edu) or contact Title IX Coordinator  
Ashley Blamey at [ashleyblamey@utk.edu](mailto:ashleyblamey@utk.edu).

Campus Title IX annual reports can be accessed  
online via the following campus links:

***UT KNOXVILLE***

***UT CHATTANOOGA***

***UT MARTIN***

***UT HEALTH SCIENCE CENTER***

***UT SPACE INSTITUTE***



THE UNIVERSITY OF  
**TENNESSEE**  
SYSTEM

The University of Tennessee is an EEO / AA /  
Title VI / Title IX / Section 504 / ADA / ADEA  
institution.



# THE UNIVERSITY OF TENNESSEE BOARD OF TRUSTEES

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## AGENDA ITEM SUMMARY

Meeting Date: May 8, 2020

Committee: Audit and Compliance

Item: **UT System Clery Act Compliance Update**

Type: Information

Presenter: Ashley Blamey, Title IX Coordinator

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Based on observations and recommendations from State Audit and Internal Audit, as well as campus-communicated needs, the system has expanded an existing position (Deputy Title IX Coordinator) to incorporate Clery compliance responsibilities. The presentation will address the current Clery landscape, overlap with Title IX, and responsibilities of the System Clery Compliance Coordinator & Deputy Title IX Compliance Coordinator.

The role of System Clery Compliance Coordinator & Deputy Title IX Compliance Coordinator will serve to implement internal controls to ensure the accurate and complete reporting of security and safety information. The role will focus on coordination, communication, and collaboration.

During the meeting, Dr. Ashley Blamey, Title IX Coordinator in the Office of Audit and Compliance, will provide an update on Clery Compliance and the newly implemented plan for system coordination.



# THE UNIVERSITY OF TENNESSEE BOARD OF TRUSTEES

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## AGENDA ITEM SUMMARY

Meeting Date: May 8, 2020

Committee: Audit and Compliance

Item: **UT System FEMA COVID-19 Claim**

Type: Information

Presenter: Judy Burns, Associate Director, Office of Audit and Compliance

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On March 13, 2020, the President of the United States officially declared a national emergency due to the COVID-19 outbreak. This declaration allows the Federal Emergency Management Agency (FEMA) to provide Public Assistance funding to state and local jurisdictions (including higher education institutions) for Category B Emergency Protective measures. These measures are those actions taken before, during, and following an event to save lives, protect health and safety, and eliminate the immediate threat.

During the meeting, Ms. Judy Burns, Associate Director in the Office of Audit and Compliance, who is coordinating UT's claim, will provide an overview of the process and answer questions from Committee members.

# Office of Audit and Compliance Response to COVID-19 Pandemic

May 8, 2020



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# Internal Audit Priorities and Adjustments



Emerging Risks & Potential Projects



Business Process Reassurance



Transformational Work

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Extraordinary expense tracking  
Online learning management  
Business continuity plan & response  
Security of online classes/work  
COVID-19 work processes & security



Student tuition & fee refunds  
Management services agreements  
Export controls  
Cash controls processes  
Changing audit approach & scope



Policies & procedures revisions  
Business managers' guide update  
Virtual workspaces

# Institutional Compliance Priorities and Adjustments



## Priorities On Schedule

- UTC compliance risk assessment- In process
- UTK compliance risk assessment- Scheduled for fall
- System oversight of compliance risks- Expanded committee
- Data analytics- Automating process for procurement card analysis
- Data analytics- Support for Audit
- Tracking implementation of campus/institute risk mitigation plans
- Code of Conduct and Hotline promotion and training
- Review new federal and state regulations



## Transformational Work

- Leveraging Zoom to efficiently:
  - Increase collaboration with campus committees and compliance officers
  - Deliver personalized training for compliance officers and compliance committee members
  - Facilitate intra-office work among compliance staff and with the audit staff
- Assessing CARES Act for compliance risk

# Title IX Office Priorities & Transformational Work



## Priorities On Schedule

- 2019 System Annual Report
  - Campus/ Institute Reports
- 2020- 2021 Policy on Sexual Misconduct, Relationship Violence, Stalking, & Retaliation
- Auditing Title IX: Presentation to the Association of College & University Auditors
- Summer Campus Virtual Reviews



## Transformational Work

- Expansion of system area to incorporate Clery Compliance coordination function
- Relunched System Wide Online Title IX Training for Violence Against Women Act (VAWA) Requirements
- Partnerships with University of Alaska System and University of Washington on Title IX related audit and annual reporting
- Alternative Resolution Resource Development

AUDIT AND COMPLIANCE COMMITTEE WORK PLAN	W-2020	A-2020	F-2020	W-2021	A-2021	F-2021
<b>KEY REPORTS AND SPECIAL FOCUS TOPICS</b>						
❖ Title IX Program		X			X	
❖ Clery Act Program			X			X
❖ NCAA Compliance Program		X			X	
❖ Emerging Risk and Compliance Topics (as needed)						
<b>ACTION ITEMS</b>						
❖ Audit and Compliance Committee Charter		X			X	
❖ Internal Audit Charter	X			X		
❖ Annual Audit Plan		X			X	
❖ Institutional Compliance Work Plan		X			X	
❖ Approval of Minutes	X	X	X	X	X	X
<b>OTHER STANDING REPORTS (Information Only)</b>						
❖ FY Operating Budget (Salary, Staffing)	X			X		
❖ Travel Exception Report	X	X	X	X	X	X
❖ Outstanding Audit Issues	X	X	X	X	X	X
❖ Discretionary Expenditure Report	X			X		
❖ Institutional Compliance Program	X	X	X	X	X	X
❖ Management's Risk Assessment			X			X
❖ University's Code of Conduct		X			X	
❖ Conflict of Interest (as needed)						
❖ Monthly reports and status	X	X	X	X	X	X
❖ Annual Report of Audit Plan (completed, follow-up, etc.)	X			X	X	
❖ Annual Evaluation of Chief Audit & Compliance Officer		X			X	
❖ Quality Assurance & Improvement Program		X			X	
❖ Institutional Compliance Risk Assessment	X			X		
❖ State Audit presents Audited Annual Financial Statements	X			X		
❖ State Audit presents Athletics Agreed-Upon Procedures	X			X		
<b>NON-PUBLIC SESSION</b>						
❖ External Audits (as needed)	X	X	X	X	X	X
❖ Investigations in Progress	X	X	X	X	X	X
❖ Review of Claims and Litigation (see PolicyTech BT0012)	X	X	X	X	X	X