



THE UNIVERSITY OF TENNESSEE SYSTEM

OFFICE OF THE PRESIDENT

RANDY BOYD
President

December 16, 2024

Mr. James E. Bryson, Commissioner
Department of Finance and
Administration
State Capitol Building
Nashville, TN 37243

The Honorable Jason E. Mumpower
Comptroller of the Treasury
State Capitol Building
Nashville, TN 37243

Dear Mr. Bryson and Mr. Mumpower:

This annual report regarding the University of Tennessee's risk management and internal control activities is submitted in compliance with *Tennessee Code Annotated (TCA) §9-18-101*, known as the Tennessee Financial Integrity Act, as amended.

The enclosed document describes the key activities undertaken in calendar year 2024 to address the requirements specified in §9-18-102 of the Act and in the document issued by the Tennessee Department of Finance and Administration in October 2016 entitled "Management's Guide for Enterprise Risk Management and Internal Control."

We understand this guide requires all state agencies' risk management and internal control functions to align with the Committee of Sponsoring Organizations of the Treadway Commission's (COSO) enterprise risk management framework and the federal government's adaptation of COSO's *Internal Control—Integrated Framework* (2013) titled *Standards for Internal Control in the Federal Government*.

As head of the University, I attest that we have assessed risks in conformance with these requirements, and I acknowledge the responsibility for establishing, implementing, and maintaining an adequate internal control system and assessing its effectiveness. I also recognize that all internal control systems have inherent limitations and can provide only *reasonable* assurance that controls are functioning as intended.

Based on the risk and control activities performed during 2024 as described in the attached document, I have reasonable assurance that the University of Tennessee's internal controls in these areas are adequate and effective in achieving our objectives and am unaware of any material weaknesses or lack of compliance in the areas examined.

The results of the risk assessment and control activities have been documented and retained.

This assurance report will be provided to the Audit and Compliance Committee of the UT Board of Trustees to fulfill the requirement in the committee's charter to "review management's risk assessment."

Please let me know if you have questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Randy Boyd". The signature is stylized with a large, sweeping initial "R" and a distinct "B".

Randy Boyd
President

Enclosure

c: Ms. Andrea Addis
Ms. Carrie Allen
Ms. Judy Burns
Mr. Mike Corricelli
Mr. Brian Daniels
Ms. Michelle Earhart
Mr. Bob Hunter
Mr. David Miller
Ms. Cindy Moore
Ms. Sarah Pruett
Ms. Kathy Stickel
Ms. Tammy Worley
Audit and Compliance Committee



Financial Integrity Act Annual Assurances Report

For Calendar Year 2024

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The University of Tennessee

Risk Management and Control Activities

Calendar Year 2024

INTRODUCTION

Purpose

This document summarizes the risk management and control activities conducted at the University of Tennessee (UT) during calendar year 2024 that provide the basis for the annual reporting and attestation required by the Tennessee Financial Integrity Act of 1983 (TFIA) as described in *Tennessee Code Annotated* §9-18-104. These activities include new initiatives and longstanding activities that demonstrate the University's commitment to implementing and refining a comprehensive risk management and control monitoring system that not only meets but *exceeds* the requirements of Tennessee's Financial Integrity Act.

Background

The University's approach complies with the October 2016 document, "Management's Guide for Enterprise Risk Management and Internal Control," issued by the Tennessee Department of Finance and Administration (TN F&A). The management guide requires state agencies' risk and control activities to align with the following frameworks:

- 1) The Committee of Sponsoring Organizations of the Treadway Commission's (COSO's) enterprise risk management (ERM) framework (UT's approach is based on COSO's ERM document, *Enterprise Risk Management—Integrating with Strategy and Performance* issued in 2017) and
- 2) The federal government's adaptation of COSO's *Internal Control—Integrated Framework* (2013) titled *Standards for Internal Control in the Federal Government* (commonly known as "the Green Book").

The ERM function resides in UT System Audit and Compliance and is led by the enterprise risk officer (ERO) who reports to the University's chief audit and compliance officer. See the ERM website at <https://finance.tennessee.edu/erm/>.

Strategic Plan Focus

The University began an initiative to assess risks related to achieving the goals and objectives in the *UT Systemwide Strategic Plan, 2021-2025*, in January 2022, the first full year of the plan's implementation. This activity continued in 2023 with the intent to become a standard aspect of the strategic planning process. The plan is at

<https://plan.tennessee.edu>. (Note: as of fall 2024, plans are underway for creating a strategic plan for 2025-2030.

Focusing on the risks related to the achievement of a systemwide plan aligns with TN F&A's guidance to always assess risks "in light of setting and achieving an agency's objectives" and ensure that "the risk identification process focuses on those risks that matter" (p. 4 of 7).

Section I of this report describes the activities associated with assessing risks related to the Systemwide Strategic Plan, which forms the basis for UT's ERM work. Section II describes the specific ERM work for 2024. Section III includes the University's key ongoing activities related to risk identification, monitoring, and control testing: 1) the annual Self-Assessment of Internal Controls, 2) risk-based internal auditing, 3) the Institutional Compliance function, and 4) cybersecurity initiatives.

Reporting. This report, appended to the University of Tennessee's Financial Integrity Act Annual Assurances Report, serves as a basis for the UT President's attestation that UT has complied with the requirements of the Act and will be published on the UT ERM website, provided to UT executive leaders and members of the Board of Trustees Audit and Compliance Committee, and submitted to State of Tennessee officials (Commissioner of Finance and Administration and the Comptroller of the Treasury) as required by the guidelines issued by the Tennessee Department of Finance and Administration.

This report does not contain confidential, detailed information about risks. Complete information is available from the offices responsible for the activities, including the office of the Enterprise Risk Officer.

SECTION I: ASSESSING RISKS RELATED TO THE UT SYSTEMWIDE STRATEGIC PLAN

Assessing risks related to the achievement of the goals and objectives in the UT Systemwide Strategic Plan began in January 2022, the first full year of the plan's implementation, with risk assessments performed throughout that calendar year and continuing throughout 2023 and 2024. Development of a new systemwide strategic plan is scheduled to begin in January 2025.

Background on the Strategic Plan. Throughout 2021, the Systemwide Strategic Planning Steering Committee and working groups—including members from all campuses and institutes—met to review and assess existing plan goals and objectives and develop ways to build on past successes and ensure continuous improvement toward achieving the University's mission.

The plan provides the goals, objectives, and metrics for measuring success that will guide efforts in the plan's five pillars—Enhancing Educational Excellence, Expanding Research Capabilities, Fostering Outreach and Engagement, Ensuring Workforce and Administrative Excellence, and Advocating for UT—each of which represents a fundamental element of UT's mission.

The UT Systemwide Strategic Plan, along with the values and vision, provides overall direction for the entire UT System. The direction cascades to the campuses and institutes, each with their own strategic plans that reflect each entity's distinctive mission, environment, and stakeholder needs.

In two areas of the Systemwide plan—Pillar 1 (academic affairs and student success) and Pillar 2 (research)—activity for achieving the related goals and objectives takes place at the campuses. Similarly, Pillar 4 (ensuring workforce and administrative excellence) contains a goal regarding employee engagement and job satisfaction, which is addressed by each UT entity. Other pillars are managed by the System Administration or other entities, such as the UT Foundation Inc., the UT Research Foundation, and the Institute for Public Service.

UT's ERM Process. As shown in the following graphic, the University's ERM process consists of three phases: I. Risk Assessment, II. Risk Response, and III. Monitoring and Reporting.

UT ERM PROCESS



2022-23 ERM Activities. In 2022, the ERO identified the goals and objectives that should be included in a risk assessment and the UT officials responsible for implementing the objectives at the campuses, the UT System Administration, and other entities.

The ERO interviewed officials working in the functional areas related to each objective to gather the necessary information. The interviews focused on obtaining answers to the following questions for each objective:

- What are the top three impediments (internal or external) that UT faces over the next couple of years in trying to achieve this objective? What are the top three to five activities currently underway related to each of these impediments?
- Conversely, what are the top three opportunities where UT might be able to take some risks or take advantage of favorable conditions to achieve this objective? What

are the top three to five activities currently underway related to each of these opportunities?

From the interviews, the ERO drafted risk assessments with the following elements:

- The top impediments (risk threats) and opportunities (risk opportunities) related to the achievement of the objective.
- The magnitude of the impact (H, M, L) on the objective if the threat or opportunity were to occur.
- The likelihood of the threat or opportunity occurring (H, M, L).
- Current actions related to each threat and opportunity.
- The desired future response to each threat and opportunity (e.g., mitigate, accept, avoid, or share the risk or pursue, defer, ignore, or share the opportunity).
- The position/office responsible for overseeing each objective and ensuring that appropriate responses to risks and opportunities are implemented.

All draft risk assessments were reviewed by officials involved in the meetings and senior campus/unit leaders, where appropriate, and necessary revisions made before finalizing. These detailed risk assessments are retained by the Enterprise Risk Officer with copies provided to the officials involved with producing them.

In 2023, this same process was followed to significantly update all the previous year's risk assessments. Revisions were necessary in several cases because the UT officials who participated in the risk assessment process in 2022 were no longer with the University, and their successors or interim office holders were asked for their views, which in some instances were significantly different from those of their predecessors. In other cases, some of the risks previously identified were replaced by more relevant or higher priority ones.

SECTION II: 2024 ERM ACTIVITIES

In 2024, the ERO focused risk management efforts on:

- Completing Phase III of UT’s ERM Process: Monitoring and Reporting—for the systemwide strategic plan objectives assigned to the UT System Administration (UTSA), UT Research Foundation (UTRF), the System Office of Communications and Marketing (SOCM), UT Foundation, Inc. (UTFI), and the Division of Governmental Relations, Advocacy, and Economic Development (GRAED). (See Attachment.)
- Identifying the multiple UTSA-led efforts to address systemwide strategic plan objectives related to enrollment and student success. (See Attachment.)
- Revising previously developed risk assessments—either to address a changed risk environment or to reflect the thoughts of officials new to their positions. (See Attachment.)
- Pilot-testing applying the ERM process to a component unit of the University—the TN Grow Your Own Center.
- Initiating campus- and functional area-level ERM approaches to further integrate ERM throughout all levels of the University.
- Implementing AuditBoard’s RiskOversight and CrossComply as a means of providing a “single source of truth” for ERM, Institutional Compliance, and IT security data and facilitating the risk management process.

Monitoring and Reporting

Phase III of UT’s ERM process requires completing the steps below for each of the most significant risk threats and opportunities (i.e., those rated high impact and high likelihood of occurrence) to objectives in the systemwide strategic plan. During 2024, the work was focused on the objectives assigned to UTSA, UTRF, SOCM, UTFI, and GRAED:

1. Describe the **key initiatives and actions** that are in progress or planned to begin within the next 12-24 months (CY 2024-25) to respond to the high impact threats or opportunities.
2. Indicate the **responsible official(s)** (position names) for implementing each of the key initiatives and actions.
3. Describe the **metrics or indicators** that will determine whether the initiatives and actions are successful.
4. Describe how the official responsible for implementation of the actions will **monitor progress**.
5. Describe how the official responsible **communicates progress and results to key decision makers** who could use this information to revise actions, objectives, or targets.

Performing these steps created a roadmap for addressing the key threats and opportunities related to systemwide goals and objectives, as well as widened the circle of UT staff involved

in risk management efforts and provided a mechanism for officials to evaluate the performance of their initiatives and actions.

UTSA Enrollment and Student Success Initiatives

Multiple 2024 initiatives by the UT System Division of Academic Affairs, Research and Student Success (AARSS) directly address two key objectives in the UT Systemwide Strategic Plan: increasing enrollment and enhancing student mattering and belonging, which research has shown leads to student success.

Enrollment is tracked in multiple ways, including systemwide and campus totals, by student level and various demographic and other groupings. Student mattering and belonging, at the system level, is tracked through the Student Experience Survey at each campus. Administered each fall by the AARSS director of student success, and in partnership with each campuses' Chief Student Affairs Officer, the survey contains one item that specifically addresses "mattering and belonging," thus allowing AARSS and each campus to track the effectiveness of their efforts to meet student needs in this area over time.

The key activities described below, while initiated or led by AARSS, involve all UT System campuses.

UT System Strategic Enrollment Planning: With the support of a nationally recognized firm and active participation from each campus, in 2024 the UT System began development of a multi-year, systemwide strategic enrollment planning framework, along with the necessary infrastructure for long-term, coordinated action. The System plan will inform subsequent campus enrollment plans that will dovetail with the System's vision statement on enrollment and campus total enrollment goals. Collectively, these efforts will provide a roadmap for sustainable enrollment growth and increases in student success outcomes.

The UT System contracted with the Huron Consulting Group to support these efforts and convened an enrollment planning council consisting of enrollment and student success leaders from each campus. The council developed said systemwide enrollment planning framework that outlines priorities, initiatives, roles and responsibilities to support a more coordinated approach. This fall, the council has been focused on data collection and sharing, developing campaigns younger prospective students (i.e., pre-high school) to increase awareness of the benefits of a college degree and to positively impact public perceptions of the value of higher education. Beginning this fall, UT campus enrollment leaders also initiated conversations on their campuses to kick-off the development of their own updated strategic enrollment plans that aligns with systemwide efforts.

Access and Engagement: In September 2024, the UT System's new executive director for access and engagement joined the leadership team of the VP for AARSS. The executive director's role is to consult and partner with system and campus leaders to advance the University's land-grant mission to serve the people of Tennessee. The work of supporting the campuses will focus on assisting with prioritization of access and engagement initiatives from student recruitment through graduation. This will include convening campus partners,

facilitating solutions to shared obstacles, coordinating resources, sharing expertise and best practices, and coordinating systemwide engagements (e.g., summits, retreats, etc.) to foster cross-team collaboration. Our access and engagement efforts are focused on reaching college-ready individuals at all corners of our state and supporting all students through to graduation. Our efforts are successful when we increase application rates to UT from Tennessee college-going students, increase first-year retention rates and student persistence rates on each campus, and continue to increase the percentage of students who believe their campus environment supports free expression as well as student perceptions about access to viewpoint diversity on their campus.

Enhancing the UT Promise Experience: Starting in the 2024-2025 academic year, the UT Promise program's income threshold was increased from \$60,000 to \$75,000, making two thirds of Tennessee families eligible. The minimum award for UT Promise recipients was increased from \$100 to \$500 per semester. These changes resulted in a significant increase of applications—the program received over 13,000 applications for the class of 2024, which was a 46% increase from the previous year's total. UT System staff also continued to work with campus colleagues and statewide partners to improve processes and communications in support of student and mentor retention goals.

UT Access Collaborative: The UT System drafted policy and provided coordination for the UT Access Collaborative, a pathway program for invited UT Knoxville applicants designed to expand admission options to students interested in enrolling at the University of Tennessee, Knoxville in the future. Selected students not admitted to UT Knoxville will be offered the opportunity to begin their first year at another UT System campus (i.e., Chattanooga, Martin, Southern). After satisfying UT Access Collaborative requirements during their freshman year, these students may transfer to UT Knoxville the following fall to complete their undergraduate study.

Launch National Common Application at all Undergraduate Campuses: As of September 2024, UT Chattanooga, UT Southern, and UT Martin joined UT Knoxville on the national Common Application. Prospective college students can now apply to any or all undergraduate University of Tennessee campuses through a single application, simplifying the admissions process and expanding opportunities for students in Tennessee and beyond to apply to any UT campus. The inclusion of all UT undergraduate campuses on the Common App is another step in the University's broader efforts to make higher education attainable for all.

Guaranteed Admissions Policy Update: The Board of Trustees approved updates to UT's guaranteed admissions policy at its June 2024 meeting. Originally adopted in September 2023 for the fall 2024 admissions cycle, the policy's intent is to expand access, increase transparency, enhance recruitment efforts for Tennessee's best and brightest students, promote greater geographic representation, and further the university's land-grant mission. The policy requires students to meet application deadlines, be among the top 10 percent of their high school graduating class or achieve a 4.0+ core GPA, and score within the individual campus' required GPAs and ACT/SAT scores thresholds.

Chief Wellness Officer. As of February, a nationally recognized expert on student mental health and wellness, Dr. Jessi Gold, assumed the role of the inaugural chief wellness officer for the University of Tennessee System. Primarily focused on students but with plans to expand to employees, this new leadership role builds on existing strengths and support at each campus across the UT System to promote mental health and well-being and identify opportunity for growth. The Chief Wellness Officer hired graduate students in 2024 to begin working on a number of focus areas, including data and reporting and mapping UT's wellness ecosystem (e.g., programming, infrastructure, etc.). In addition to this systemwide role, Dr. Gold also serves as a psychiatrist on the UT Health Science Center's Memphis campus, where she sees students, faculty, and staff.

Student Wellness Advisory Councils. The UT System's Student Wellness Advisory Councils are designed to bring together undergraduate and graduate student voices from across the UT System to enhance a collective understanding of student wellness needs and perspectives. Wellness is a multifaceted concept that includes emotional, physical, social and financial well-being, among others. By focusing on these areas, the council's aim is to foster a culture that prioritizes prevention, support, and overall student success both in college and beyond. The chief wellness officer, in collaboration with the UT System Student Success team invited applications for membership on the 2024–25 council at the beginning of the Fall semester and selected 2-3 undergraduate and 2-3 graduate students from each UT campus. Thanks to input from the student wellness advisory councils, much of the content for the UTWellness Instagram account, which the chief wellness officer launched on World Mental Health Day (Oct 10), will be student driven and will serve as a place for education and normalization of wellness across the system. The students will also regularly provide feedback and lend their voices to the work of the Chief Wellness Officer.

UT System Mental Health Collaborative: The AARSS director of student success and the chief wellness officer met with the UT System Mental Health Collaborative in March. The group discussed telemental health needs systemwide, acquainted the wellness officer with campus-specific initiatives, wellness resources, and suggested how she can best assist with systemwide efforts moving forward. A key focus for the collaborative is supporting UT students and ensuring that they are connected to the people, resources, and information they need to thrive. Colleagues from the Collaborative and their campus counterparts gathered in July for a UT System Mental Health Leaders Retreat, a two-day event to discuss mental health and wellness efforts and plan for future collaborations. After the retreat, the chief wellness officer assumed responsibility for coordinating this group and it has continued to meet monthly to share and be a source of support across the system.

New Working Groups for Chief Wellness Officer: Based on campus visits and key challenges identified in the retreat and Mental Health Collaborative, the chief wellness officer developed two new working groups across the system. One, the substance use and prevention working group, is chaired by experts at UTC and UTM, and is in partnership with the SMART initiative, and is focusing on opioid use and prevention—including Narcan training and distribution. The other, the taking care of our own working group, is chaired by counselors at UTC and UTK, and is looking at ways to support the faculty and staff who do

the work in wellness across the system. Both groups meet monthly and are establishing goals.

Telemental Health. The University awarded contracts for two telemental health technology solutions following a systemwide effort spearheaded by the AARSS director of student success in collaboration with campus chief student affairs officers and mental health representatives. UTHSC students will access telemental health services through TimelyCare; UTK will add TELUS Health to their portfolio of services for students. Among other services, TimelyCare and TELUS provide students with additional counseling options, peer-to-peer support, and self-guided content. Other UT System campuses can opt-into using either service in the future.

Anti-Hazing Summit: Approximately 55 campus and UT System leaders gathered in Nashville in February 2024 for the inaugural UT System Anti-Hazing Summit. During the two-day event, experts from the Hazing Prevention Network and Piazza Center lead UT campus representatives in discussions on topics including research-based hazing prevention strategies, barriers to success, and campus prevention planning. These national organizations praised the UT System for taking proactive steps to ensure their approaches to anti-hazing are even stronger and more effective. AARSS plans to continue to engage with campus partners regarding next steps to further enhance campus efforts.

Student Government Associations (SGA) Collaborations. The chief wellness officer and the AARSS director of student success met with SGA officers at their annual meeting in August where the administrators shared the work of individual campuses and collaborative work toward addressing student wellness. They also listened to the officers to learn about student concerns on their campuses. The director of student success plans to further develop the relationship with this leadership group and the various campus associations.

Student Leave of Absence: The AARSS director of student success continues to coordinate with campus contacts to draft student leave of absence policies on each campus. The campus points of contact will circulate the policies to appropriate campus partners for feedback, revision, and further discussion. Efforts around this national best practice are part of a systemwide approach to ensure the success of our students by removing barriers to persistence and developing appropriate alignment across UT campuses.

New Student Success Working Group: The AARSS director of student success meets regularly with student success leads or designees from each campus. The group, coordinated by UTC, meets monthly and provides a space for student success partners to collaborate, share updates and best practices, discuss challenges, and offer solutions.

Risk Assessment Review and Revisions

Several of the risk assessments originally completed over the past two years were revised significantly in 2024 due to changing risk conditions and newly appointed officials (see Attachment). Other minor changes were made to the existing risk assessments as Phase III

work was completed. A key philosophy of UT's ERM approach is that risk assessments must be continually reviewed for relevance and completeness.

TN Grow Your Own Center Risk Assessment

From the outset, UT's ERM process was designed to be scalable so that it could be used at the UT System-, campus-, or component unit-level. As a member of the UTSA's Strategic Planning Coordinating Team, the ERO participated in the development of an initial strategic plan for the recently established TN Grow Your Own Center. This involvement presented an opportunity to apply UT's ERM process to a component unit. After the Center's goals and strategies were finalized, the ERM process was integrated into the development of an implementation plan. For each of the Center's five goals and related strategies, the following steps were completed:



To evaluate the responses to each risk threat or opportunity, Center leadership discussed whether current or planned actions (from the strategic plan or otherwise) were sufficient to address the threat or opportunity, given the potential impact on the achievement of the goals. Based on the evaluation, one of the following response strategies was selected:

- **Mitigate** the threat/**pursue** the opportunity if strategies must be revised or additional actions taken.
- **Accept** the threat/**defer** the opportunity if current actions are sufficient for the time being, i.e., "stay the course."
- **Share** if it's necessary or possible to take advantage of a partnership in addressing the threats/opportunities.
- **Avoid** the threat/**ignore** the opportunity if the best course of action is to stop pursuing a current action/strategy or decline to pursue an opportunity because the risk is too great.

After identifying the appropriate response strategy, additional actions were documented for addition to the implementation plan for all strategies except **avoid/ignore**. For example, even if choosing to accept a threat or defer an opportunity, an action of "monitor the situation during the next few months" could be added.

At the end of this process, the Center had a fully developed implementation plan, and the ERO had conducted a pilot project or “proof of concept” that validated the efficacy of the ERM process at a focused organizational level.

Campus and Functional-Area ERM Approaches

In Fall 2024, planning began for three impactful projects that will broaden the focus of UT’s ERM activities by involving an entire campus—the UT Health Science Center—and a mission-critical functional area (research) at two other campuses (UTK and UTC).

At UTHSC, the Executive Vice Chancellor for Finance & Administration and Chief Operating Officer expressed a desire to establish a campus-level ERM program and has designated staff members who will work with the System ERO and other Audit and Compliance staff to develop an implementation plan. Program implementation is targeted to begin in early 2025.

UT’s chief audit and compliance officer (CACO) and the ERO met with the Vice Chancellor for Research (VC) at UT Knoxville and key staff members in the Office of Research, Innovation, and Economic Development to discuss the possibility of using an ERM process to enhance their strategic planning implementation. As a result, the VC and her leadership team will engage in a process to identify the risk threats and opportunities to the objectives in their strategic plan. Facilitated by the CACO and ERO, the Research team will engage in several meetings over the next few months to determine what, if any, additional actions need to be taken or revisions made to their strategies to achieve their objectives.

The Vice Chancellor for Research at UT Chattanooga and leadership team members in the Office of Research and Sponsored Programs agreed to participate in a similar approach. The UTC campus targets Fall 2024 for the completion of their campuswide strategic plan. Once the plan is finalized, the Research team will provide their goals and objectives to the ERO to serve as a basis for their ERM work.

Implementing AuditBoard’s RiskOversight and CrossComply

In 2023, the ERO partnered with the Institutional Compliance (IC) team and the UTSA chief information security officer to identify an information system to house risk management information for all three functional areas. In Fall 2023, design and implementation of the selected solutions, AuditBoard’s RiskOversight and CrossComply, began. The “go-live” occurred in June 2024.

ERM uses RiskOversight. The goal is for this system to serve as a “single source of truth” for UT’s ERM information, ensuring continued access and availability of the information by removing the vulnerability of having the data reside in a single individual’s personal files. More importantly, however, the system will allow for greater analysis of the data and help to streamline processes.

The risk assessment process provides a wealth of information that can be used by leaders to evaluate priorities, look for ways to collaborate across the System, and communicate to stakeholders, including the Board of Trustees, how UT is addressing the internal and external uncertainties it faces in pursuit of its goals and objectives. RiskOversight offers easy-to-understand visuals on dashboards, which will facilitate communication. The software also allows analyses from several perspectives, including campus or institute, risk threat or opportunity, and strategic objective. The system will also allow for streamlining the risk assessment process, using the capabilities of the software to automate some steps and to allow UT officials to enter their own information, thus distributing some of the effort involved. Currently, RiskOversight contains all the information generated over the past three years related to identifying and assessing the risks related to the achievement of the goals and objectives in the Systemwide Strategic Plan, 2021-2025.

IC uses two modules of AuditBoard's software. CrossComply houses the hundreds of regulations and policies with which the University must comply; RiskOversight houses risk assessment information. The risks in RiskOversight are linked to the appropriate regulations in CrossComply.

RiskOversight enables subject matter experts for each regulatory area to complete risk assessments online. These assessments are then evaluated by the relevant campus or unit compliance committee, who determines whether corrective actions are needed. If so, action plans are developed by the appropriate subject matter expert.

In addition to regulatory compliance, IC uses AuditBoard to administer the annual Self-Assessment of Internal Controls. Used for the first time in 2024, RiskOversight helped to streamline the self-assessment process and enhance the information provided. For additional information on the self-assessment of controls, refer to Section III of this report.

The UTSA Information Security Office is implementing both RiskOversight and CrossComply. RiskOversight will be used to conduct risk assessments, while CrossComply will house the various frameworks that must be assessed. The current focus of the design work is to streamline the risk assessment process so that a single risk assessment can cover multiple frameworks and standardize its use at all campuses and institutes. For additional information on the frameworks, see the Cybersecurity section of this report.

SECTION III: ONGOING RISK ASSESSMENTS, MONITORING AND TESTING OF CONTROLS

In addition to the activities described above, UT engages in multiple methods for the ongoing assessment of risks and the monitoring and testing of controls. Four of the key system-level approaches are 1) the annual self-assessment of controls, 2) risk-based internal audits, 3) the institutional compliance program, all managed by UT System Audit & Compliance (A&C), and 4) cybersecurity reviews.

Self-Assessment of Controls

Originally developed in the 1980s as a means of complying with Tennessee's Financial Integrity Act, the annual Self-Assessment of Controls (SAC) assesses controls at an operational level. In a decentralized organization, such as a university, many controls for business processes are located at the department level.

All departments in the UT System (633 for 2024) are required to conduct a self-assessment of controls for selected major business processes by completing a questionnaire. Each year the questionnaire covers one or two major processes; one process is universal to all departments (e.g., computer usage), while the other is applicable to only a subset of departments (e.g., money handling).

Over a multi-year cycle, the questionnaires cover approximately 190 key internal controls for eight major processes, including human resources/payroll, money handling, computer usage, inventories for resale, accounts receivable, equipment, sponsored projects, and procurement.

These processes are determined through a risk assessment process, targeting the areas considered to be key to sound departmental management. Processes are adjusted as the need arises, and each year A&C staff review the controls to be assessed, involving staff who are subject matter experts in each of the related business areas, when necessary, to ensure that the questionnaire reflects the current environment (including changes to internal policies and related laws and regulations) and includes controls to prevent or detect fraud. The self-assessment process not only serves to identify and rectify control weaknesses but serves to educate the University community on sound business practices.

Beginning in 2024, the Institutional Compliance (IC) staff in A&C assumed responsibility for this initiative and used the functionality of the recently implemented AuditBoard software to streamline the process and enhance the information provided. For 2024, **payroll** and **human resources** controls were assessed.

Department heads or their representatives complete the questionnaire online. Each section of the questionnaire (e.g., payroll) contains links to relevant UT policies. Each question focuses on a key control, for example, "Do hourly paid employees record the actual time they worked and were absent rather than their planned work schedules?" Respondents select one of three multiple-choice answers:

- 1) Agree. This is our process.
- 2) Disagree. We do something different.
- 3) N/A.

If "Agree" is not selected, the respondent must provide additional information about the department's process or explain why the question is not applicable. The additional information is reviewed by a designated campus/unit SAC coordinator (with assistance from IC staff when needed) to determine whether a control weakness exists.

When a weakness is identified, the SAC coordinator notifies IC staff who create an "issue" in the AuditBoard system, which indicates the corrective action needed, the related UT policies, and the risk presented by the existing control weakness. The issue is forwarded to the respondent who describes the corrective action that has been implemented. The SAC coordinator reviews the respondent's corrective action and closes out the issue if the action is judged sufficient. IC staff can also review the corrective action and return the issue to the respondent and SAC coordinator if necessary.

Of the 633 departments surveyed, 18 identified and corrected a total of 38 control weaknesses. The following table shows the results by campus and unit. IC provides each chief business officer with detailed results for their campus or unit.

2024 Self-Assessment of Controls Results			
Human Resources and Payroll			
Campus/ Unit	Departments/ Questionnaires	Departments with Control Weaknesses	Control Weaknesses Identified and Remediated
IPS	6	0	0
UTC	77	7	25
UTHSC	31	0	0
UTIA	144	2	2
UTK	188	7	8
UTM	74	2	3
UTS	63	0	0
UTSA	27	0	0
UTSI	23	0	0
TOTAL	633	18	38

Of the control weaknesses identified, none were considered critical control gaps. A critical control gap is a deficiency that could have a substantial negative impact on the University's ability to effectively mitigate risk and achieve its objectives.

Reporting. Each year, the chief business officers of the campuses and other entities review the results of the self-assessment and attest to their knowledge of the deficiencies identified and the corrective actions taken to address those deficiencies. The results of the self-assessment are issued to the president, with copies to the enterprise risk officer, chief financial officer, the treasurer, and the UT Board of Trustees' Audit and Compliance Committee, among others.

Risk-Based Internal Audits

A second ongoing means for assessing risks and testing controls for effectiveness is through in-depth internal audits. In accordance with IIA standards, A&C establishes a risk-based audit plan to determine the priorities of the internal audit activity for the coming year. The development of this plan is based on a documented annual risk assessment process that is led by the chief audit and compliance officer, the executive director of internal audit, and members of the A&C leadership team with key stakeholders across the UT System. The risk assessment focuses on issues that present a high degree of risk to the UT System and/or individual campuses and units.

Risk Assessment Process. The risks are identified through collecting and analyzing information from multiple sources, including the following:

- A&C documents risk information from A&C team members on an ongoing basis.
- Annually, the A&C leadership team gathers risk information from sources including Board of Trustees Audit and Compliance Committee (BOT A&C Committee) members and key members of management at all campuses and units. This information is gathered through personal interviews or a survey.
- Professional resources (ACUA, IIA, NACUBO, SCCE, EDUCAUSE, NCAA, and others) may also be used to identify emerging issues.
- The results of the annual self-assessment of internal controls (see above) and compliance risk assessments facilitated by Institutional Compliance (see below) are considered when determining risks to address through the audit plan.

Once the information has been gathered, it is reviewed by the A&C leadership team. Areas presenting a higher degree of risk are further analyzed to determine if they can be properly addressed in the next audit plan and, if so, which type of audit engagement can best address the risk. The annual audit plan is drafted and approved annually by the BOT A&C Committee.

Types of Engagements. One of internal audit's primary roles is to reduce the University's risk, or exposure to loss by evaluating risk exposure related to the University's governance,

operations, and information systems and to determine the potential for fraud. A&C conducts numerous types of engagements. Some examples from the 2024 audit plan include: state-mandated audits (such as annual audits of UT campus chief executive officers and the Complete College Tennessee Act), risk-based audits (such as a systemwide audit of the contracts management, campus-level audits of building access security and leave monitoring, and college/school audits of controls over cash and gift cards), policy compliance audits (performed in administrative and academic divisions/departments at the campuses and institutes), and consulting engagements (such as systemwide reviews of NIL policy & procedures, IT: third party risk management, and sponsored projects pre-award process). Investigations into allegations of fraud, waste, and abuse (often resulting in recommendations for improving internal controls) are also performed by A&C.

Reporting. A&C issues reports to the audit client and appropriate management, UT senior leadership, the State Comptroller's Office, and the BOT A&C Committee. The A&C Committee members are apprised of outstanding audit issues and their magnitude on a regular basis.

Institutional Compliance

The third ongoing means of monitoring risks and controls is Institutional Compliance (IC), established within A&C, which is responsible for designing, implementing, and monitoring the UT system-wide compliance program. The basis for the program is the *Federal Sentencing Guidelines for Organizations*, which defines the standards for effective compliance programs. For a comprehensive overview, visit the website at <https://audit.tennessee.edu/compliance/>.

Among the office's responsibilities are developing and implementing the University's compliance risk assessment process, recommending improved controls in various compliance functional areas, and collaborating with officials at the campuses and institutes to develop innovative and effective ways to mitigate compliance risk.

Risk Assessment Process. The risk assessment process includes four primary steps:

- 1) Identify regulatory areas relevant to UT (around 500).
- 2) Identify who at each campus/unit has responsibility for compliance with each regulation (these responsible officials are designated as "campus compliance officers"; over 300 throughout UT).
- 3) Provide training to the compliance officers and require them to complete a risk assessment (the same web-based risk assessment is used throughout UT to ensure consistency). Risk assessments occur roughly every five years.
- 4) Provide results to the campus compliance committees that identify priorities and coordinate the development of risk mitigation plans.

Risk Assessment Objectives. These risk assessments are designed to demonstrate due diligence in complying with regulations. The assessments also help the University oversee the many aspects of the compliance function. The objectives of the risk assessments are to:

- Identify control weaknesses.
- Identify areas of noncompliance.
- Take remedial actions where needed.
- Identify potential weaknesses that need to be monitored.
- Identify targeted areas in need of assistance.
- Provide a baseline against which future performance can be measured and linked to improvement processes implemented.

Compliance Committees. IC coordinates an institutional compliance committee for each campus and institute. In addition, the office coordinates the activities of the UT System Administration Institutional Compliance Committee, which has oversight responsibility for all campuses and institutes.

Each campus and institute institutional compliance committee is responsible for general oversight of its compliance activities. The committee chair is appointed by the chancellor or vice president, and the committee members include campus compliance officers in key areas. The campus compliance committee reviews the results of the periodic risk assessments performed by the campus compliance officers and ensures that appropriate risk mitigation plans are developed and implemented where needed. The committee also determines the compliance priorities for the campus or institute and submits recommendations to the chancellor/vice president for risk mitigation plans that need additional resources, administrative changes, or increased enforcement.

2024 Key Compliance Activities. In addition to leading the implementation of AuditBoard’s RiskOversight software during the first half of the year (see above), key IC activities include the following:

- Completed campus compliance committee training for UT Martin and the Institute for Public Service, with risk assessments scheduled to begin Fall 2024.
- Assumed responsibility for conducting the Self-Assessment of Internal Controls and redesigned the process using AuditBoard’s software (see above).
- Began an Environmental Health & Safety and Emergency Management policy and regulatory assessment.
- Participated, along with the General Counsel’s office, in ensuring compliance with a recently enacted state law, Tennessee Code § 49-7-188, which requires “[e]ach public institution of higher education [to] safeguard its academic research from foreign adversaries by establishing a research security policy....” A key result was the approval of a Board of Trustees policy on research security, which also aligns with multiple federal directives and laws, including National Security Presidential Memorandum 33, the CHIPS and Science Act, and the National Defense Authorization Act. Additionally, the policy provides for the designation of a chief research security officer, campus and institute research security officers, and a research security council that will be responsible for evaluating the University’s research security posture and for developing an integrated and comprehensive research security program (including

administrative policies, procedures, guidance, and training). The Board approved the policy at its October 2024 meeting with implementation to follow.

Reporting. IC staff regularly report key compliance activities and any significant issues to UT executive leadership and the Audit and Compliance Committee of the Board of Trustees.

Cybersecurity

Multiple cybersecurity initiatives with systemwide involvement and impact were launched or completed in 2024. These activities strengthen the University's security posture through a unified cybersecurity approach. Key initiatives include 1) the establishment of a managed Security Operations Center, 2) revised IT security policies, 3) deployment of AI email protection, 4) third-party risk management monitoring, 5) testing a new access and identity management system, and 6) implementation and testing of a risk management information system.

Managed Security Operations Center. The University's IT community has coalesced around a single information security strategy where defined roles and responsibilities, enhanced collaboration, actionable steps, and clear guidance work together to create a stronger and more integrated security framework. The adoption of a single strategy enabled the establishment of a managed third-party Security Operations Center (SOC) that became operational in mid-July 2024.

The unified SOC is a combination of services purchased from Dell and Microsoft that monitors the UT systemwide computing environment 24x7x365 and alerts and remediates on behalf of the system and campuses. When UT campuses experience a threat or attack, Microsoft tools catch the intrusion. Dell resources work quickly to block the attack or, if the threat is extensive, notify UT campus security leadership that further steps must be taken. This strategy is a marked departure from the historical approach that involved limited UT personnel who could mitigate threats primarily during business hours.

Through September 23, 2024, the SOC handled approximately 5,100 information security events classified medium or high, only 85 of which were escalated to UT, providing a significant time savings.

Implementation of two Microsoft tools, Intune (device management) and Defender (threat detection), in June 2024 was necessary to enable the SOC's operations. Intune is a tool for inventorying and managing workstations, providing the ability to push security configurations to the devices. This capability allows for standardizing security control deployment and effectively managing any exceptions to those configurations. Defender is the Managed Detection and Response (MDR) tool for device and server malware protection. Defender is an advanced form of antivirus prevention because it analyzes the

behavior of software on the system to alert and automatically contain software that behaves abnormally. The alerts from Defender are one of the primary data sources feeding the SOC.

All in-scope devices throughout the entire system will be monitored in a staggered approach over the next 12-24 months.

IT Policy Revision. A key initiative for 2024 has been to move the University toward a unified approach to cybersecurity. The University has adopted the Center for Internet Security (CIS) Critical Security Controls (CSC) as a strategy for managing cybersecurity risks. The CIS CSC are prescriptive, prioritized, and simplified best practices designed to mitigate the most common cyberattacks against systems and networks. CIS CSC aligns with the University's current business model and can be mapped to multiple compliance frameworks already in use.

CIS is a non-profit organization staffed by volunteer experts from a wide range of sectors including defense, education, government, healthcare, manufacturing, retail, transportation, and others. CIS's mission is to continuously evolve cybersecurity standards and provide products and services to proactively safeguard against emerging threats.

Currently, the UT System Administration's chief information security officer is leading the revision of UT's IT policies to reflect the adoption of the CIS CSC. Key policies currently under revision include "Information Security Strategy" and "Risk Management."

The draft "Information Security Strategy" policy requires each campus and institute to:

- Create, approve, maintain, and implement an information technology security strategy (including procedures, best practices, and guidelines) that:
 - Documents the implementation strategies and steps for complying with the CIS CSC (or other security frameworks as required in contracts),
 - Identifies and assigns responsibilities for evaluating and accepting risk, and
 - Has campus/institute senior management approval.
- Annually review its strategy, including procedures, best practices, and guidelines based on risk management principles and classification of the university data and systems.
- Create a documented implementation workplan that includes scope, timelines of implementation, risk evaluation and mitigation, and a clear explanation of how the data and system categorization process is integrated into security strategy.

The draft "Risk Management" policy requires each campus and institute to:

- Develop and adhere to an IT risk management program that ensures the implementation of appropriate and effective controls for the university's resources based on risk. The program should include:
 - A process to document, track, and ensure that the risk assessments are updated according to the frequency and other requirements specified in the policy or when significant changes are made to systems or their operational environment that pose new threats and vulnerabilities.

- A process to document and disseminate risk assessment results to appropriate management and system and data owners.
- A process to track risk mitigation for each risk found, including providing documentation on acceptance of risk by the campus or institute leadership.
- A process to report all risk management efforts to the Enterprise Risk Officer for the University of Tennessee System on an annual basis.
- Communicate, through the central IT department, the requirements and processes for risk management to the campus community annually to engage campus communities and individuals in the shared responsibility of risk management.
- Follow the CIS Risk Assessment Method (RAM) unless there is a contractual and/or governmental requirement to use another methodology. CIS RAM risk assessments involve the following activities:
 - Establish and define the criteria for evaluating and accepting risk.
 - Evaluate current implementations of the CIS Safeguards that would prevent or detect foreseeable threats.
 - Estimate the expectancy and impact of security breaches to arrive at the risk score, then determine whether identified risks are acceptable.
 - Propose CIS Safeguards that would reduce unacceptable risks.
 - Risk-analyze the recommended CIS Safeguards to ensure that they pose acceptably low risks without creating an undue burden.
- Catalogue all risk assessments in a central repository (e.g., AuditBoard's software).

AI Email Protection. UT deployed Abnormal Security's AI email protection tool across the System in August 2024. This proactive security tool uses artificial intelligence to analyze all incoming email messages to determine if they are malicious. If messages are determined to be malicious, they are not delivered to the account's inbox. Requiring only a few hours per week to ensure no legitimate emails were miscategorized as malicious, the tool can drastically reduce the human intervention hours needed to retroactively clean up malicious emails, for example, after a successful phishing campaign. During a 90-day period in fall 2024, this solution prevented over 236,000 malicious emails from being delivered.

Third-Party Risk Management. A product called UpGuard was implemented systemwide in September 2024 for continuous third-party risk management monitoring. UpGuard constantly scans the internet to gather and analyze system vulnerabilities, providing a view of an organization's (including UT's) technology vulnerabilities from a malicious actor's perspective. With this information, the University can not only monitor its vendors but learn about its own vulnerabilities to prioritize IT risk remediation initiatives. UpGuard also actively scans the dark web for chatter about the University, providing insights into possible attacks or data leaks that would have previously gone unnoticed.

Identity and Access Management. As of September 2024, the University's Identity and Access Management (IAM) initiative is in the development and testing phase, with a production go-live date in March 2025. UT partnered with Dell Technologies to leverage their

skills to migrate the current custom-built IAM solution to Microsoft Identity Manager (MIM). Using a supported platform to manage account creation and changes mitigates the risk associated with using a custom solution of losing employees who have closely held, often unwritten, knowledge about the system.

Risk Management Information System. The UT System Administration's Information Security Office, which offers security services for the individual campuses and institutes as well as UTSA, partnered with UT's Enterprise Risk Officer and the Institutional Compliance team to identify and select a risk management information system—AuditBoard's RiskOversight and CrossComply—in late 2023, with design work continuing into 2024. The RiskOversight module will be used to conduct and store risk assessment information, while CrossComply will house the various frameworks that must be assessed, including CIS 8.0, PCI, CMMC, and NIST 800-171. The current focus of the design work is to streamline the risk assessment process so that a single risk assessment can cover multiple frameworks and standardize its use at all campuses and institutes.

CONCLUSION

Focus areas for ERM in 2025 include implementing the proposed ERM program at the UT Health Science Center, completing the risk assessments for UTK and UTC Research, and developing strategic and operational ERM plans for the next three to five years.

2024 UT ERM ACTIVITIES BY SYSTEMWIDE STRATEGIC OBJECTIVE

PILLARS	GOALS	OBJECTIVES*	Phase III of ERM Process	UTSA-Initiated Activity	Revised Risk Assessment/Risk Assessment Approach
Pillar 1: ENHANCING EDUCATIONAL EXCELLENCE	Goal 1: Expand UT's educational footprint	Obj 1.1.1: Increase total enrollment and total degrees awarded		X	UTHSC
	Goal 2: Enhance student success	Obj 1.2.1: Increase fall-to-fall first-year retention rate		X	
		Obj 1.2.2: Increase 4-yr and 6-yr graduation rates		X	
		Obj 1.2.3: Eliminate achievement gaps in first-year retention and graduation rates for historically underserved students (gender, minority, Pell-eligible, first-gen, rural).		X	
		Obj 1.2.5: UT students across the system feel a sense of mattering and belonging		X	UTHSC
		Goal 3: Elevate UT's national reputation for educational excellence and academic innovation	Obj 1.3.1: Increase graduate and professional enrollment and the number of graduate and professional degrees awarded		X
Pillar 2: EXPANDING RESEARCH CAPABILITIES	Goal 1: Elevate UT's global reputation in discovery and innovation	Obj 2.1.1: Increase annual total research expenditures.	UTM	X	UTK, UTC, UTHSC
	Goal 2: Increase participation of demographically diverse faculty, staff, & students in research	Obj 2.2.1: Increase the number of UT faculty, postdocs, grad and UG students participating in research activities (paid from research accounts, assumes 100% tentue and tenure track faculty)	UTM	X	UTK, UTC, UTHSC

PILLARS	GOALS	OBJECTIVES*	Phase III of ERM Process	UTSA-Initiated Activity	Revised Risk Assessment/Risk Assessment Approach
		Obj 2.2.2: Increase the participation of diverse faculty, postdocs, grad and UG students in research (diversity = race/ethnicity, paid from research accounts, assumes 100% tentue and tenure track faculty)	UTM	X	UTK, UTC, UTHSC
	Goal 3: Expand the impact of UT's research on the lives of Tennesseans and beyond	Obj 2.3.1: Increase commercial licenses for UT technologies by 50%.	X		UTRF
Pillar 3: FOSTERING OUTREACH & ENGAGEMENT	Goal 1: UT transforms grand challenges facing Tennessee communities and industries	Obj 3.1.1: UT transforms three of our state's grand challenges into strengths and increases Tennessee's rank into the top 50% of US states.	X		SOCM
Pillar 4: ENSURING WORKFORCE & ADMINSTRATIVE EXCELLENCE	Goal 1: Our workforce reflects a diverse and engaged population representing the varied dimensions of diversity	Obj 4.1.1: Members of the UT workforce, representing the varied dimensions of diversity, express a high degree of engagement and job satisfaction	X		UTK
		Obj 4.1.2: The minority composition of UT's workforce will increase so that UT will be a leader among its peers.	X		
	Goal 2: Recognized as a "Best Place to Work"	Obj 4.2.1: All campuses and institutes are recognized as a preferred place to work.	X		
	Goal 3: Continuously and collaboratively improve the efficiency and effectiveness of administrative processes	Obj 4.3.1: Streamline and standardize core administrative processes for employees to accomplish work more effectively (DASH implementation).	X		

PILLARS	GOALS	OBJECTIVES*	Phase III of ERM Process	UTSA-Initiated Activity	Revised Risk Assessment/Risk Assessment Approach
Pillar 5: ADVOCATING FOR UT	Goal 1: Elevate public awareness and understanding of UT's value to the state, nation, and world	Obj 5.1.1: 85% of Tennesseans can identify one or more system-wide impacts of UT in their life.	X		
		Obj 5.1.2: Visible UT presence in all 95 counties by 2030 ("Everywhere...UT" murals)	X		SOCM
		Obj 5.1.3: System-wide communications and marketing campaign that showcases how UT is addressing grand challenges.	X		
	Goal 2: Increase engagement and participation of diverse advocates, donors, and alumni to advance the UT System	Obj 5.2.1: Expand the number of donors and generate an increase in the amount of total private support over the five-year period.	X		
		Obj 5.2.2: Increase the number of engaged alumni.	X		
		Obj 5.2.3: Build advocacy network to 10,000	X		
		Obj 5.2.4: Identify and proactively engage systemwide volunteer leadership groups that represent every grand division, campus and institute, as well as urban, rural, and suburban regions.	X		
	Goal 3: Increased state and federal support of UT as the state's higher education leader and solver of grand challenges	Obj 5.3.1: Achieve 100% of our legislative agenda as the state's higher education leader and solver of grand challenges.	X		

PILLARS	GOALS	OBJECTIVES*	Phase III of ERM Process	UTSA-Initiated Activity	Revised Risk Assessment/Risk Assessment Approach
		Obj 5.3.2: Develop a comprehensive government relations policy and training for UT employees to protect UT's voice on legislative issues.	X		
		Obj 5.3.3: Strengthen UT relationships with State agencies and entities, resulting in new partnerships benefitting the University and the State.	X		
		Obj 5.3.4: Increase engagement and visibility of UT among federal government partners to build trust in UT's capacity to address grand challenges.	X		

* Includes only the objectives for which risk assessments were performed over the past three years.

Legend: X = Phase III work completed, Gray Box = NA, ACRONYM = Indicates campus/unit that completed an activity or committed to a new approach.

Acronyms: **UTSA** (UT System Administration), **UTK** (UT Knoxville), **UTC** (UT Chattanooga), **UTS** (UT Southern), **UTM** (UT Martin), **UTHSC** (UT Health Science Center), **UTRF** (UT Research Foundation), **SOCM** (System Office of Communications and Marketing)