



THE UNIVERSITY OF TENNESSEE

BOARD OF TRUSTEES

AUDIT AND COMPLIANCE COMMITTEE	
Tuesday, July 1, 2025	Wolford Family Athletics Facility
10:45 a.m. (EDT) / 9:45 a.m. (CDT)	UT Chattanooga

AGENDA

Public Session

- I. Call to Order and Roll Call
- II. Opening Remarks of the Committee Chair
- III. [Approval of Minutes from Last Meeting](#) - Action..... Tab 1
- IV. [Public Safety Update](#) Tab 2
- V. [NCAA Compliance Update](#) Tab 3
- VI. [Consent Agenda](#)..... Tab 4

Information Items

- A. [Research Security – Implementation Report](#) Tab 4.1
 - B. [2025 Audit Plan Update](#)..... Tab 4.2
 - C. [2025 System Title IX Report](#) Tab 4.3
 - D. [Outstanding Audit Issues](#)..... Tab 4.4
 - E. [Institutional Compliance Update](#)..... Tab 4.5
 - F. [Travel Exception Report](#) Tab 4.6
- 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 attention of the Committee Chair or Board Secretary before the meeting.]
- VIII. Closing Remarks and Adjournment



THE UNIVERSITY OF TENNESSEE BOARD OF TRUSTEES

Nonpublic, Executive Session

Following the public session, the Committee will convene in a nonpublic, executive session pursuant to Tennessee Code Annotated § 4-35-108 to review:

- Audits
- Investigations
- Litigation



THE UNIVERSITY OF TENNESSEE BOARD OF TRUSTEES

MINUTES OF THE AUDIT AND COMPLIANCE COMMITTEE February 27, 2025

The Audit and Compliance Committee of The University of Tennessee Board of Trustees met at 3:15 p.m. (CST) on Thursday, February 27, 2025. The meeting was held in the Russell Duncan Ballroom located in the Boling University Center at the University of Tennessee at Martin, Martin, Tennessee.

Committee Members Present: Decosta E. Jenkins, Committee Chair; John C. Compton, Board Chair; and Bradford D. Box.

Others in Attendance:

Trustees: Charles Hatcher, Commissioner, Tennessee Department of Agriculture; Lisa N. Patel (Student Trustee); William (Bill) C. Rhodes III; Donald J. Smith; and David N. Watson.

University Administration: President Randy Boyd; Brian Daniels, Chief Audit and Compliance Officer; David Miller, Senior Vice President and Chief Financial Officer; Cynthia Moore, Board Secretary and Special Counsel; C. Ryan Stinnett, General Counsel; Interim Chancellor Robert Dooley (UT Chattanooga); Chancellor Peter Buckley (UT Health Science Center); Chancellor Yancy Freeman (UT Martin); Chancellor Linda Martin (UT Southern); and Chancellor Donde Plowman (UT Knoxville). In addition, other members of the University staff were present.

Ms. Moore announced the presence of a quorum. The meeting was webcast for the convenience of the University community, the general public, and the media.

Opening Remarks of the Chairperson

Committee Chair Jenkins welcomed everyone to the meeting.

Approval of the Minutes

Committee Chair Jenkins noted that the minutes of prior meeting were included in the meeting materials (Tab 1). He asked for any corrections to the minutes. Hearing none, the minutes were accepted as presented.

2025 Institutional Compliance Plan

Chief Audit and Compliance Officer Brian Daniels introduced the 2025 Institutional Compliance Plan, which was presented by Dr. Sarah Pruett, Executive Director of

Institutional Compliance. Dr. Pruett outlined how the 2025 plan builds on successes from 2024, such as the rollout of the AuditBoard software platform. The pilot project focused on the self-assessment of controls in support of the Tennessee Financial Integrity Act, which involved 700 departments across the UT System. There was a 100% response rate with overwhelming positive feedback from the stakeholders regarding the use of this new tool. She continued the presentation by detailing the following 2025 goals.

- **Education and Internal Development**
 - Train compliance team to develop subject matter expertise; and
 - Build capacity to support external campus stakeholders effectively.
- **Connected Risk Framework**
 - Collaborate closely with audit function; and
 - Align compliance responses to audit findings for lifecycle risk management.
- **Monitoring & Communication**
 - Respond promptly to changing federal/state regulations; and
 - Enhance internal and external communication channels.

Dr. Pruett then highlighted specific 2025 initiatives and projects, including: (i) undertaking risk assessments at UT Chattanooga and the UT Health Science Center; (ii) implementing additional research compliance modules (grants, human subjects research, and export control); (iii) revising and updating policies to reflect new regulatory requirements; and (iv) advancing the University's environmental health and safety (EHS) and emergency management (EM) efforts through training, best practices, and collaborative policy development.

Upon motion duly made and seconded, the Committee approved the 2025 Institutional Compliance Plan (as set forth in Tab 2 of the meeting materials).

2025 Internal Audit Overview

Andrea Addis, Interim Executive Director of Internal Audit, presented three major items reflective of changes in audit standards from the Institute of Internal Auditors (IIA):

- proposed updates to the Committee's charter;
- revisions to the internal audit department's charter; and
- the 2025 audit plan.

She explained that both charters were being revised to align with the newly expanded Global Internal Audit Standards, which grew from 25 to 120 pages, introducing significant governance expectations. Notably, the internal audit charter would now fully

reflect updated responsibilities, independence protections, and audit mandates, while removing oversight of compliance functions that do not fall under audit's scope. In response to questions raised by trustees, Mr. Daniels explained that the IIA is an international governing body for internal auditors and that its standards are widely accepted as the baseline globally. He noted that while not all institutions follow these standards (particularly if their internal audit functions are not operationally independent), the University does meet the criteria and can adhere to them. Additionally, in Tennessee, there is a state law requirement that requires the University's compliance with IIA standards.

The proposed 2025 audit plan was discussed in detail, including goals such as improving the integration of audit and compliance risk tools, mapping internal controls affected by the university's Dash business transformation, expanding IT audit efforts, and tracking key performance indicators for audit quality and quantity. Ms. Addis noted a strategic reduction in advisory services (from 47% to 29%) to preserve independence, with a clear mandate to separate advisory staff from later audit roles in the same area. The risk-based audit plan aims to cover 21 risk-based audits, 11 annual audits, and 14 advisory projects, with an emphasis on deferred maintenance, capital project management, and IT administrative access. Charts were shared to demonstrate systemwide audit allocation, showing a return to baseline for UT Chattanooga following an unusually high engagement in the prior year.

Committee Chair Jenkins indicated that a high percentage of advisory services can potentially undermine audit independence, a problem that he has seen elsewhere. He expressed support for the reduction in the amount of advisory work, calling it a move in "the right direction."

Upon motion duly made and seconded, the Committee approved: (i) the Audit and Compliance Committee Charter; (ii) the Internal Audit Charter; and the 2025 Internal Audit Plan (as set forth in Tabs 3.1-3.3 of the meeting materials).

Continuity of Operations Assessment

Committee Chair Jenkins then introduced a report on continuity of operations planning, spurred by trustee inquiries after natural disasters like 2023 Hurricane Helene and the recent California wildfires. Ms. Addis summarized results from a university-wide consultation, which assessed nine entities using Federal Emergency Management Agency (FEMA) and Tennessee Emergency Management Agency (TEMA) continuity guidelines to evaluate business continuity preparedness. Findings emphasized the need for a university-wide policy distinct from emergency response planning, especially in areas like agricultural extension and research, which have unique geographic distribution across the state. Keith Carver, Senior Vice Chancellor and Senior Vice President of UT Institute of Agriculture (UTIA), expanded on the lessons learned from

the Helene flooding that affected six UT Extension offices in East Tennessee. He described proactive efforts to develop continuity planning across all UTIA units, leveraging internal faculty expertise in crisis communication and ensuring alignment with campus and system-level emergency resources.

UT Privacy Program

The meeting continued with a presentation on the new systemwide Privacy Program, delivered by Shauna Jennings, Director of Privacy and Associate General Counsel. Ms. Jennings provided an overview of activities during her first 18 months, which included building relationships across UT campuses, streamlining and aligning definitions of directory information under FERPA¹, contributing to AI policy development, and helping shape a new records management policy. She described current initiatives such as partnering with CampusGuard to assess HIPAA² compliance, launching a Privacy Impact Assessment process for major projects, and assembling a GDPR³ compliance working group. Her forward-looking goals include creating a centralized UT privacy website to serve as an informational resource for the campus community. Ms. Jennings emphasized that privacy must be a shared cultural value, not merely a legal or policy matter.

Campus Safety - UT Martin

Chief Michael O'Neill of UT Martin's Department of Public Safety provided an overview of public safety operations. Chief O'Neill highlighted the department's restructuring, collaboration with local agencies, and strategic use of student workers in dispatch and traffic management. While UT Martin sits in a county with average crime rates for Tennessee, the campus has one of the lowest crime rates among its peer institutions, particularly in major offenses. He detailed his department's 2025 goals, which focus on modernizing equipment, improving parking logistics, and enhancing training through interdepartmental collaboration and community engagement. He also praised the strong administrative support he has received.

Legislative Updates

Deputy General Counsel Rachel Powell shared legal updates on Title IX and the Clery Act.⁴ She explained that although the U.S. Department of Education issued new Title IX regulations in 2024 (expanding definitions and adding pregnancy protections), a federal court vacated the entire rule package in January 2025, reverting enforcement to the 2020

¹ *Family Educational Rights and Privacy Act (FERPA)*.

² *Health Insurance Portability and Accountability Act (HIPAA)*.

³ *General Data Protection Regulation (EU) 2016/679 (GDPR)*.

⁴ *Jeanne Clery Campus Safety Act (Clery Act)*.

framework. As such, the University has continued to maintain its existing policies. She also briefed the Committee on the new, federal Stop Campus Hazing Act, which amends the Clery Act and introduces three new requirements: (i) inclusion of hazing statistics in annual security reports using a federal definition; (ii) new campus policy statements on hazing and prevention programs; and (iii) campus hazing transparency reports, which will publicly identify sanctioned student organizations and related details. Implementation is staggered, with policy development and reporting requirements due throughout 2025 and 2026.

In response to questions raised by the Committee members, Ms. Powell clarified that Tennessee state law provides a single definition of hazing that all campuses are required to use in investigations and student conduct matters. However, under the new federal law, there is also a separate federal definition of hazing, used only for Clery reporting purposes. This dual-definition framework will add an additional level of complexity in terms of regulatory requirements. In terms of new hazing prevention and awareness policies, she stated that, while all campuses will meet the same federal requirements, there may be some variation in how each implements awareness campaigns and programs given differences in campus size and population. She emphasized that each program must be research-informed, as mandated by the law, and that the campuses are currently developing these efforts with input from Clery coordinators and cross-campus working groups.

Consent Agenda

Committee Chair Jenkins called the attention of the Committee members to the information items included in the Consent Agenda (Tabs 5.1 through 5.6). He clarified that the item labeled “External Audit Management Letter” is a management representation letter rather than a letter highlighting audit findings. No items were removed from the Consent Agenda for discussion. A complete list of the informational items included on the Consent Agenda appears at the end of these minutes.

Other Business and Closing Remarks

With no further business to come before the Committee, the Committee Chair adjourned the public portion of the meeting and announced that the Committee would next meet in a non-public, executive session in accordance with Tennessee law to discuss confidential and/or privileged matters.

Respectfully Submitted,

/s/ Cynthia C. Moore
Cynthia C. Moore
Secretary and Special Counsel

Consent Agenda – Information Items

- 2024 Audit Plan Update
- Outstanding Audit Issues
- Travel Exception Report
- NCAA Agreed Upon Procedures Report
- External Audit Management Letter
- Research Security Update



THE UNIVERSITY OF TENNESSEE BOARD OF TRUSTEES

AGENDA ITEM SUMMARY

Meeting Date: July 1, 2025

Committee: Audit and Compliance

Item: **Public Safety Update**

Type: Discussion

Presenter(s): Kelly Mihalik, Special Projects Investigator & Public Safety Mgr.

Background Information

The important topic of safety and security across the UT System is brought forward for discussion. The Tennessee Bureau of Investigation releases an annual Crime on Campus with crime statistics from college and university campuses. While the statistics listed within require contextual understanding to fully grasp the intent, this data does at least provide a three-year snapshot of certain reported crimes on campuses. The goal of this discussion is to provide an update along with the associated context.

Public Safety Update

Crime on Campus Statistics



College & University Security Information Act

- TBI compiled report
- Tennessee Incident Based Reporting System
- FBI definitions
- Numbers reflect incidents reported to police
- Crime rate based on **total campus population**

2024 Statewide Overview

- Overall crime reported decreased
 - Drug/Narcotic offenses decreased
- Assaultive offenses decreased
 - Stalking showed a marked decrease

UT System Trends

- Theft, Vandalism, Drug Offenses most prevalent
 - Some campuses report decreases

UT Knoxville

	2024	Rate Per 1000	2023	Rate Per 1000	2022	Rate Per 1000
Homicide Offenses	0	0	0	0	0	0
Kidnapping/Abduction	1	0	0	0	2	0.1
Sex Offenses (Forcible)	4	0.1	6	0.1	6	0.2
Robbery	0	0	0	0	3	0.1
Assaultive Offenses	40	0.9	26	0.6	53	1.4
Arson	0	0	0	0	0	0
Extortion/Blackmail	1	0	3	0.1	1	0
Burglary	6	0.1	14	0.3	11	0.3
Larceny/Theft Offenses	98	2.2	71	1.7	138	3.7
Motor Vehicle Theft	4	0.1	11	0.3	6	0.2
Counterfeiting/Forgery	28	0.6	1	0	4	0.1
Fraud Offenses	30	0.7	5	0.1	8	0.2
Embezzlement	0	0	1	0	0	0
Stolen Property Offenses	0	0	2	0	3	0.1
Destruction/Damage/Vandalism	35	0.8	31	0.7	51	1.4
Drug/Narcotic Violations	252	5.7	188	4.5	282	7.6
Pornography/Obscene Material	1	0	0	0	0	0
Gambling Offenses	1	0	0	0	0	0
Weapon Law Violations	41	0.9	14	0.3	24	0.6

UT Chattanooga

	2024	Rate Per 1000	2023	Rate Per 1000	2022	Rate Per 1000
Homicide Offenses	0	0	0	0	0	0
Kidnapping/Abduction	0	0	0	0	0	0
Sex Offenses (Forcible)	0	0	1	0.1	3	0.2
Robbery	0	0	1	0.1	2	0.2
Assaultive Offenses	32	2.4	28	2.2	32	2.6
Arson	0	0	1	0.1	0	0
Extortion/Blackmail	7	0.5	4	0.3	1	0.1
Burglary	2	0.2	6	0.5	13	1.1
Larceny/Theft Offenses	80	6.1	93	7.2	93	7.7
Motor Vehicle Theft	10	0.8	3	0.2	6	5
Counterfeiting/Forgery	0	0	0	0	0	0
Fraud Offenses	2	0.2	8	0.6	0	0
Embezzlement	0	0	0	0	0	0
Stolen Property Offenses	0	0	0	0	0	0
Destruction/Damage/Vandalism	18	1.4	30	2.3	23	1.9
Drug/Narcotic Violations	42	3.2	36	2.8	23	1.9
Pornography/Obscene Material	1	0.1	0	0	0	0
Gambling Offenses	0	0	0	0	0	0
Weapon Law Violations	2	0.2	0	0	1	0.1

UT Southern

	2024	Rate Per 1000	2023	Rate Per 1000	2022	Rate Per 1000
Homicide Offenses	0	0	0	0	0	0
Kidnapping/Abduction	0	0	0	0	0	0
Sex Offenses (Forcible)	0	0	0	0	0	0
Robbery	0	0	0	0	0	0
Assaultive Offenses	0	0	0	0	1	1
Arson	0	0	1	1	0	0
Extortion/Blackmail	0	0	0	0	0	0
Burglary	0	0	0	0	0	0
Larceny/Theft Offenses	1	0.9	4	3.9	1	1
Motor Vehicle Theft	0	0	0	0	0	0
Counterfeiting/Forgery	0	0	0	0	0	0
Fraud Offenses	0	0	0	0	0	0
Embezzlement	0	0	0	0	0	0
Stolen Property Offenses	0	0	0	0	0	0
Destruction/Damage/Vandalism	0	0	0	0	0	0
Drug/Narcotic Violations	5	4.7	1	1	2	2
Pornography/Obscene Material	0	0	0	0	0	0
Gambling Offenses	0	0	0	0	0	0
Weapon Law Violations	0	0	0	0	0	0

UT Martin

	2024	Rate Per 1000	2023	Rate Per 1000	2022	Rate Per 1000
Homicide Offenses	0	0	0	0	0	0
Kidnapping/Abduction	0	0	0	0	0	0
Sex Offenses (Forcible)	2	0.2	3	0.5	0	0
Robbery	0	0	0	0	0	0
Assaultive Offenses	25	2.9	21	3.5	28	4.6
Arson	0	0	0	0	0	0
Extortion/Blackmail	0	0	0	0	0	0
Burglary	0	0	1	0.2	0	0
Larceny/Theft Offenses	18	2.1	20	3.3	15	2.4
Motor Vehicle Theft	0	0	1	0.2	1	0.2
Counterfeiting/Forgery	0	0	0	0	0	0
Fraud Offenses	1	0.1	2	0.3	0	0
Embezzlement	0	0	0	0	0	0
Stolen Property Offenses	0	0	0	0	0	0
Destruction/Damage/Vandalism	7	0.8	4	0.7	4	0.7
Drug/Narcotic Violations	25	2.9	8	1.3	18	2.9
Pornography/Obscene Material	0	0	0	0	0	0
Gambling Offenses	0	0	0	0	0	0
Weapon Law Violations	1	0.1	1	0.2	3	0.5

UT Health Science Center

	2024	Rate Per 1000	2023	Rate Per 1000	2022	Rate Per 1000
Homicide Offenses	0	0	0	0	0	0
Kidnapping/Abduction	0	0	0	0	0	0
Sex Offenses (Forcible)	0	0	0	0	0	0
Robbery	0	0	0	0	0	0
Assaultive Offenses	14	1.8	13	1.7	4	0.5
Arson	1	0.1	0	0	0	0
Extortion/Blackmail	0	0	0	0	0	0
Burglary	2	0.3	0	0	4	0.5
Larceny/Theft Offenses	17	2.1	19	2.5	29	3.8
Motor Vehicle Theft	0	0	14	1.8	4	0.5
Counterfeiting/Forgery	0	0	0	0	0	0
Fraud Offenses	0	0	0	0	0	0
Embezzlement	0	0	0	0	0	0
Stolen Property Offenses	0	0	0	0	0	0
Destruction/Damage/Vandalism	10	1.3	19	2.5	14	1.8
Drug/Narcotic Violations	1	0.1	10	1.3	3	0.4
Pornography/Obscene Material	0	0	0	0	0	0
Gambling Offenses	0	0	0	0	0	0
Weapon Law Violations	0	0	2	0.3	6	0.8

UT System & LGIs

	UT	LGIs
	Rate Per 1000	Rate Per 1000
Homicide Offenses	0.0	0.0
Kidnapping/Abduction	0.0	0.0
Sex Offenses (Forcible)	0.1	0.2
Robbery	0.0	0.0
Assaultive Offenses	1.6	1.6
Arson	0.0	0.0
Extortion/Blackmail	0.1	0.1
Burglary	0.1	0.3
Larceny/Theft Offenses	2.7	2.7
Motor Vehicle Theft	0.2	0.3
Counterfeiting/Forgery	0.1	0.0
Fraud Offenses	0.2	0.4
Embezzlement	0.0	0.0
Stolen Property Offenses	0.0	0.0
Destruction/Damage/Vandalism	0.9	1.9
Drug/Narcotic Violations	3.3	1.3
Pornography/Obscene Material	0.0	0.0
Gambling Offenses	0.0	0.0
Weapon Law Violations	0.2	0.1

*Does not include MTSU

THANK YOU

UTC Department of Public Safety

Overview for the UT Board of Trustees



Overview



UTC Police

- Responsibility: Patrol & Community Policing, Investigations, Special Operations/Events.
- Staffing: 24 FT Police Officers; 9 FT Safety (Security) Officers; 6 FT Communications Officers; 2 Administrative Staff.



Emergency Management & Threat Assessment

- Responsibility: Emergency Planning, Behavioral Threat Assessments, Site Surveys, Intelligence Sharing, Emergency Alerts & Communications.
- Staffing: 2 FT Staff.



Environmental Health & Safety

- Responsibility: Fire & Life Safety Systems/Environmental & Occupational Safety/Lab & Research Safety & Compliance.
- Staffing: 5 FT Staff.



THE UNIVERSITY OF TENNESSEE
CHATTANOOGA
Department of Public Safety



Strategic Plan



Building Relationships & Trust

- Enhance collaboration with local, state, and federal public safety agencies.
- Increase the visibility of the Department.
- Meet, engage, and collaborate with campus partners.



Response to Active Violence

- Threat Assessments and Intelligence Sharing.
- Staff Training and Equipment.
- Site Surveys.
- Community (Civilian) Response Training.



Organizational Development

- Department organizational restructuring.
- Professional Development (e.g., Training, Leadership Development).
- Staffing and Staff Retention.



THE UNIVERSITY OF TENNESSEE
CHATTANOOGA
Department of Public Safety



Forward Momentum



Building Our Team

Recruiting qualified personnel to reach full staffing levels.



Strengthening Relationships

Fostering partnerships with campus and community stakeholders.



Equipment & Technology

Upgrading equipment to perform the mission and leveraging technology to increase awareness and capacity.



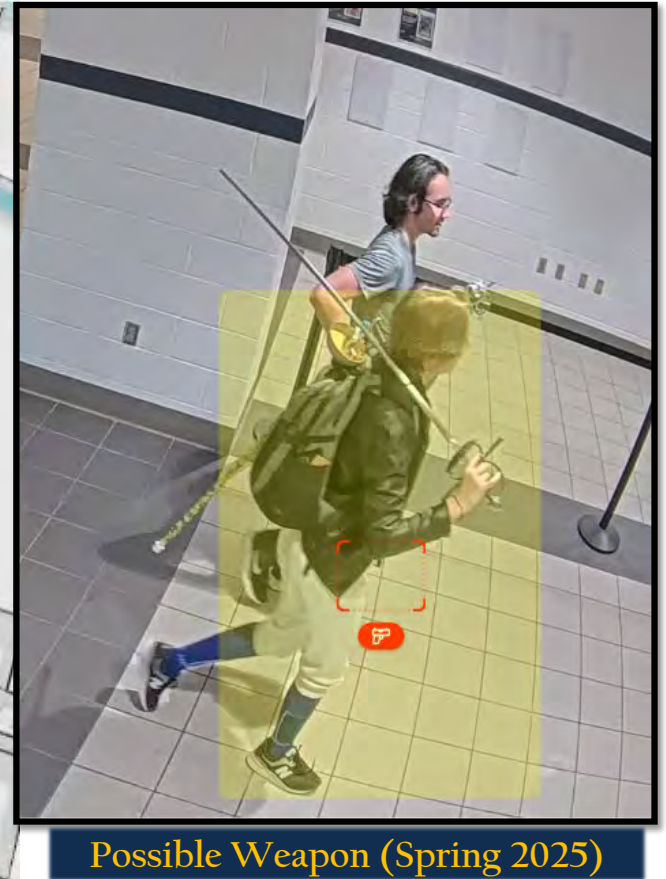
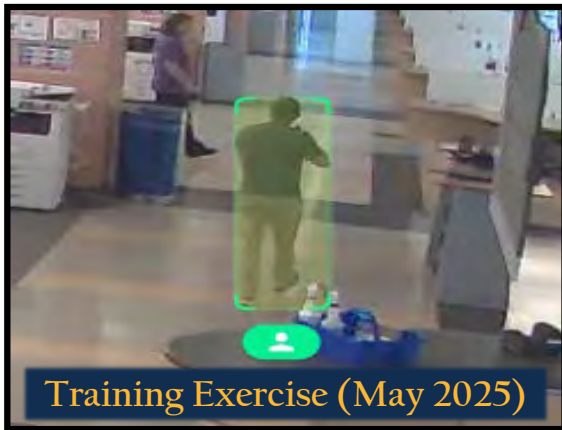
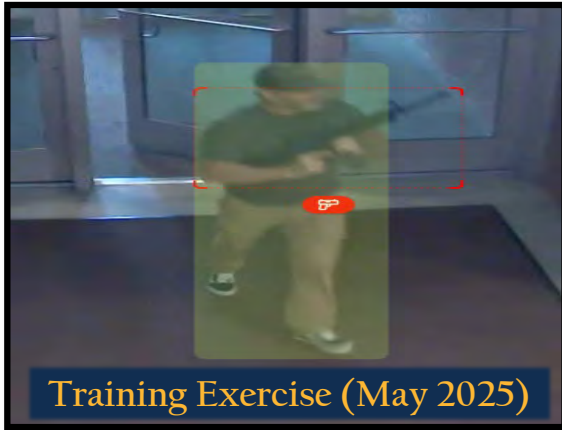
Enhanced Training

Providing specialized training for emergency response scenarios.



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Department of Public Safety



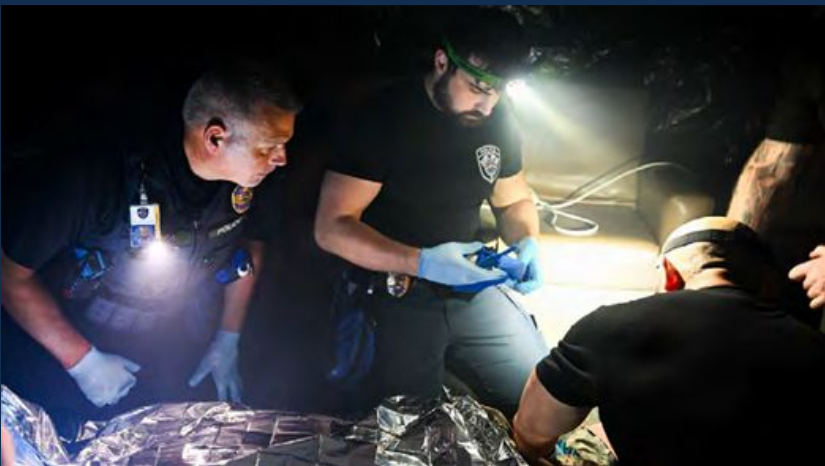
Tactical Emergency Casualty Care (May 2025)
Sponsored by THEC



Active Violence Exercise (July 2024)



Active Violence Response Training (May 2025)



Questions?



E THE UNIVERSITY OF TENNESSEE
CHATTANOOGA
Department of Public Safety



UTC Department of Public Safety

Overview for the UT Board of Trustees



Athletics Compliance Reports - Summary



THE UNIVERSITY OF
TENNESSEE
SYSTEM

Annual Campus Reports on Athletics Compliance Function

- The **compliance reporting structure is appropriate** in each campus athletics department.
- The **process for reporting and investigating** alleged NCAA rules violations **is consistent with best practices** at each campus athletics department. Note that this process may need to be revised for schools operating under the *House* settlement.
- The number of **full-time athletics compliance employees** at **UTC** and **UTK** is **above the average** among peers in their respective conferences. **UTM** has one less employee than the peer average in its conference.

Annual Campus Reports on Athletics Compliance Function

- **Each campus** reported **some Level III NCAA rules infractions** since the last annual report. UTC had 5 Level III infractions, UTK had 4 Level III infractions, and UTM had 3 Level III infractions.
 - “A **Level III** violation is a violation that is isolated or limited in nature; provides no more than a minimal recruiting, competitive or other advantage; and provides no more than a minimal impermissible benefit.” (NCAA Bylaw 19.1.4)

Annual Campus Reports on Athletics Compliance Function

- **UTM also had multiple Level II violations.** These resulted from a negotiated resolution entered following NCAA investigations of the UTM Women's Soccer and Softball programs.
 - “A **Level II** violation is a violation that provides or is intended to provide more than a minimal but less than a substantial or extensive recruiting, competitive or other advantage; includes more than a minimal but less than a substantial or extensive impermissible benefit; or involves conduct that may compromise the integrity of the NCAA Collegiate Model as set forth in the bylaws.” (NCAA Bylaw 19.1.3)

QUESTIONS?



THANK YOU



THE UNIVERSITY OF TENNESSEE BOARD OF TRUSTEES

AGENDA ITEM SUMMARY

Meeting Date: June 7, 2025

Committee: Audit and Compliance

Item: **Annual Reports on Intercollegiate Athletics Compliance Programs**

Type: Information

Presenter: Ryan Stinnett, General Counsel

Board of Trustees Policy BT0015 (Policy on Oversight of Intercollegiate Athletics) requires the Chancellor of each campus with an intercollegiate athletics program to provide a written annual report to the Audit and Compliance Committee, through the General Counsel, to ensure that the Board receives information sufficient to understand and monitor the institution's compliance with the rules and regulations of the National Collegiate Athletic Association (NCAA) and determine the adequacy of the institution's athletics compliance function.

The written annual report from each campus must contain the following information, in addition to any other information provided at the discretion of the Chancellor:

1. An explanation of the institution's reporting structure for the intercollegiate athletics compliance office and whether and to whom the intercollegiate athletics compliance office reports outside of the athletics department;
2. Description of the process for reporting and investigating alleged violations of NCAA rules;
3. The number of full-time employees in the athletics compliance office and comparison of that number with the institution's athletics peers; and
4. A description of all NCAA rules infractions since the last annual report.

In compliance with this requirement of BT0015, the written annual reports on athletics compliance from UT Chattanooga, UT Knoxville, and UT Martin are attached. General Counsel Ryan Stinnett will present the Committee with an oral summary of the reports for each of these campuses and highlight the most critical information the Committee needs to know to ensure the Board carries out its oversight role of ensuring that the institutions are controlling their intercollegiate athletics programs in compliance with NCAA rules and regulations and adequately staffing their athletics compliance functions.




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utc.edu/chancellor

3

MEMORANDUM

TO: C. Ryan Stinnett, General Counsel

FROM: Robert S. Dooley, Interim Chancellor 

RE: Annual Report to the UT Audit and Compliance Committee

DATE: May 16, 2025

The University of Tennessee at Chattanooga is committed to integrity, transparency and maintaining high ethical standards. We are also committed to the principle of institutional control and maintaining all aspects of our intercollegiate athletics program in full accordance with all NCAA, Southern Conference and University rules and regulations.

UTC's Athletics Compliance office is comprised of two full-time experienced professionals and a compliance intern dedicated to the day-to-day compliance process that assists the University in complying with all University, Conference, and NCAA rules and regulations governing the intercollegiate athletics operations as outlined in the slides provided. The Compliance Office is supervised by the Executive Associate Athletic Director/Senior Woman Administrator (a former Compliance Director) and the Vice Chancellor and Director of Athletics. The Chancellor is immediately notified and involved with any major Compliance improprieties. Additionally, the Chancellor meets annually with members of the Compliance Staff to discuss the University Compliance process that is outlined in the PowerPoint slides accompanying this report.

In 2024-25, UTC found five minor (secondary/level III) violations, which were isolated and didn't lead to any major penalties from the NCAA.

A summary of the violations include:

1. Football

Violation of NCAA Bylaw 13.2 (Offers and Inducements)

An institution's staff member or any representative of its athletics interests shall not be involved, directly or indirectly, in making arrangements for or giving or offering to give any financial aid or other benefits to a prospective student-athlete or the prospective student-athlete's family members or friends, other than expressly permitted by NCAA regulations.

A football prospective student-athlete received UTC apparel from an assistant football coach while on an official visit resulting in a violation of bylaw 13.2.

C. Ryan Stinnett
May 16, 2025
Page 2

2. Wrestling

Violation of NCAA Bylaw 13.6.3 (Requirements for Official Visit)

The following requirements must be met before a sport may provide an official visit to a prospective student-athlete. A wrestling assistant coach provided a prospective student-athlete an official visit prior to meeting the requirements of bylaw 13.6.3 (b) and (c), resulting in a violation.

- (a) A prospective student-athlete must present the institution with a high school (or college) academic transcript;
- (b) A high school or preparatory school prospective student-athlete must register with the NCAA Eligibility Center; and
- (c) A high school or preparatory school prospective student-athlete must be placed on the institution's institutional request list (IRL) with the NCAA Eligibility Center.

3. Administrative

Violation of NCAA Bylaw 12.10.2 (Squad-List Form)

To represent the institution in intercollegiate competition, all student-athletes must have their names on the official institutional form (squad list). Two student athletes were not added to the official institutional form (squad list) prior to the first day of competition, resulting in a violation of bylaw 12.10.2. The violation occurred due to a compliance administrative error and oversight.

4. Administrative

Violation of NCAA bylaw 10.02.1 (Sports Wagering)

Sports Wagering includes placing, accepting or soliciting a wager (on a staff member's or student-athlete's own behalf or on the behalf of others) of any type with any individual or organization on any intercollegiate, amateur or professional team or contest.

Unaware of the bylaw, a part-time employee for the athletics ticket office made a small wager on an intercollegiate sport resulting in a violation of bylaw of NCAA bylaw 10.02.01.

C. Ryan Stinnett
 May 16, 2025
 Page 3

5. Men's Cross Country

Violation of bylaw 17.7.8.1.1.1 (Competition as an Individual/Not Representing Institution)

When a student-athlete competes unattached (i.e., competes as an individual, representing only himself or herself) in any competition, the institution may not provide any expenses to the participating student-athlete. This includes the institution providing transportation (e.g., individual riding on team bus to competition) to an unattached participant.

A men's cross-country student-athlete received transportation expenses while competing unattached resulting in a violation of bylaw 17.7.8.1.1.1. The interim head coach was oblivious to the rule and allowed the student-athlete to ride the team bus to a competition site.

UTC and its Athletics Department have developed and adopted processes and procedures that provide guidance to our staff, students, and supporters regarding how to work within the rules and to discover, report and, where possible, correct any violations of the rules that might occur. The commitment to the principle of institutional control is both organizational and individual. In response to my review of the Annual Compliance Report and consultations with staff members, I hereby confirm all information provided is sufficient and consistent with UTC's commitment to maintaining control of its athletics programs.

cc: Brian Daniels, UT System Chief Audit and Compliance Officer
 Mark Wharton, UTC Vice Chancellor and Director of Athletics



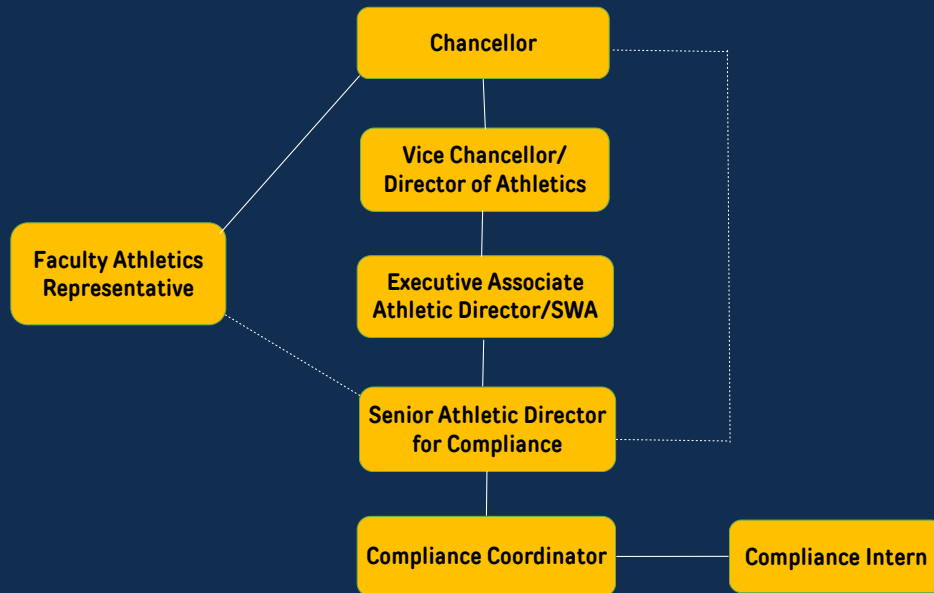
UNIVERSITY OF TENNESSEE CHATTANOOGA

COMPLIANCE ANNUAL REPORT

DEPARTMENT OF ATHLETICS

5/11/2025





COMPLIANCE ORGANIZATIONAL CHART

Full Time Staff Comparison

Institution	Full Time Staff
Mercer	2
Western Carolina	1
Wofford	1
North Carolina at Greensboro	2
Furman	2
Virginia Military Institute	1
Citadel	2
Samford	3
East Tennessee	2
UT Chattanooga	2



REPORTING OPTIONS

- 01 Compliance Staff**
- 02 Athletic Director**
- 03 Senior Woman Administrator**
- 04 Gomocs.Com/Compliance Violation Reporting**

REPORTING VIOLATIONS

If an alleged or rumored violation is communicated to any athletic department staff member, or individual other than an athletic department staff member, the individual has an obligation to report the alleged violation in a timely manner.

Conducting Investigation

Step 1- Develop Case Strategy:

1. Identify potential NCAA violations
2. Identify prospective interviewees
3. Establish order in which individuals will be interviewed
4. Identify documents to be collected
5. Create a timeline for completing investigation



Conducting Investigation

Step 2 - Who should be interviewed:

- Institution should interview any individual with potential knowledge of and/or involvement in potential NCAA violations (e.g., Staff members, student-athletes, former student-athletes).



Conducting Investigation

Step 3 - Interview Logistics:

1. Identify who is responsible for conducting interviews.
2. Who may be present during interview.
3. Where the interview will be conducted.
4. Who may know about the interview.
5. How the interview will be performed (e.g., in person, videoconference).



Conducting Investigation

Step 4 - Document Collection Consideration:

- A timeline for production of the requested documents.
- What format the requested documents should be produced (native format, Word, .pdf, Excel, photocopies, etc.) and what information may be embedded in electronic materials.
- Consequences for failure or refusal to produce requested documents.
- How a request for documents from a third party might compromise the investigation.



Conducting Investigation

Step 5 - Analysis of Information:

- Review and analyze all information collected to determine whether additional interviews or documents are necessary.
- Review entire file and determine whether the factual information and relevant bylaws indicate that violations likely occurred.
- Identify the institutional staff responsible for analyzing the information and arriving at its findings.



Conducting Investigation

Step 6- Reporting Institutional Findings to NCAA:

- Report using NCAA guidelines through Request/Self-Reports Online.





VIOLATIONS



FOOTBALL

Violations : 1
Bylaw # 13
Level III

WRESTLING

Violations : 1
Bylaw # 13
Level III

MEN'S CROSS COUNTRY

Violations: 1
Bylaw # 17
Level III

ADMINISTRATIVE

Violations : 2
Bylaw # 10,12
Level III



May 28, 2025

University of Tennessee Board of Trustees
Audit and Compliance Committee
c/o C. Ryan Stinnett, General Counsel
1169 UT Tower
505 Summer Place
Knoxville, TN 37902

Re: Annual Report to the Audit and Compliance Committee (BT0033 – Policy on Oversight of Intercollegiate Athletics)

Dear Members of the Audit and Compliance Committee:

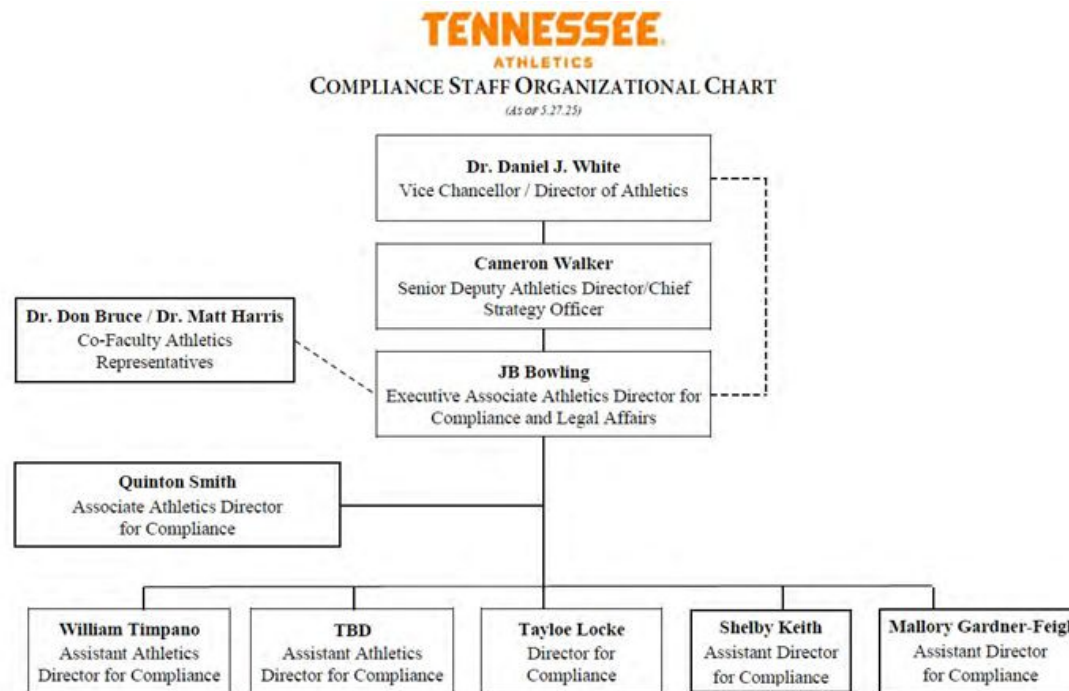
I am pleased to submit this annual written report to the Audit and Compliance Committee to ensure the Board of Trustees has information sufficient to understand and monitor the university's compliance with the rules and regulations of the National Collegiate Athletic Association (NCAA) and determine the adequacy of the university's athletics compliance function.

Sincerely,

Donde Plowman
Chancellor

Office of the Chancellor
800 Andy Holt Tower 1331 Circle Park Drive Knoxville, TN 37996-0180
865-974-2444 chancellor@utk.edu

ATHLETICS COMPLIANCE STRUCTURE



SEC PEER COMPARISON OF COMPLIANCE STAFFING

AS OF MAY 2025		
Rank	School	Full-Time Staff
1	Georgia	10
T-2	Texas A&M	8
T-2	Oklahoma	8
T-4	Alabama	7
T-4	Arkansas	7
T-4	Ole Miss	7
T-4	Tennessee	7
T-4	Texas	7
T-9	Florida	6
T-9	Kentucky	6
T-9	South Carolina	6
T-12	Auburn	5
T-12	LSU	5
T-14	Mississippi State	4
T-14	Missouri	4
T-14	Vanderbilt	4



PROCESS FOR REPORTING A VIOLATION

Any coach, employee, student-athlete, or other individual associated with the UT athletics department or an employee of UT who has NCAA compliance responsibilities (including UT employees who work outside of the athletics department) must notify appropriate institutional officials immediately of any suspected or known violation(s) of NCAA legislation or UT or SEC policies or procedures. Notification must take place by contacting (in-person or by telephone or electronic transmission) an Athletics Compliance Office staff member, the AD or FAR. Reporting this information to the head coach of an involved sport does not meet this requirement.



INVESTIGATING A VIOLATION

- Upon being informed of a possible violation, the compliance office will conduct a preliminary investigation to ascertain the general facts surrounding the incident. The parties involved in the incident may be contacted directly and asked about the matter. The compliance office will communicate the preliminary findings to the AD and FAR. The compliance office, AD and FAR jointly shall have initial responsibility for determining whether the information indicates a possible violation.
- If the information indicates further investigation is warranted, depending on the level (I-IV) of the possible violation, the compliance office will notify the Chancellor, OGC, FAR, AD, Sport Administrator and head coach if applicable.
- For potential level III & IV violations, the compliance office in coordination with the FAR will investigate all facts and apply the appropriate governing rules. If a violation is determined to have occurred, the compliance office will submit a written report to the NCAA and SEC detailing the violation and any penalties that will be self-imposed.



INVESTIGATING A VIOLATION CONT'D

- For potential level I & II violations, the compliance office, in conjunction with the FAR, shall forward the information to the OGC and that office shall be responsible for directing the investigation. During the course of the investigation, the Chancellor shall receive regular reports regarding its progress. The compliance office shall inform the SEC of the inquiry. OGC will review and approve a final written report to be submitted to the NCAA at the conclusion of the investigation.
- The institution will not permit retaliatory actions against athletics staff or student-athletes who submit or are involved in a complaint or allegation concerning NCAA rules violations. Additionally, the institution will act in accordance with institutional procedures for alleged misconduct by an employee and applicable provisions of state legislation.



LEVEL III VIOLATIONS 2024-25

PER SPORT		PER BYLAW	
Baseball	0	Bylaw 5	0
Men's Basketball	0	Bylaw 10	0
Women's Basketball	1	Bylaw 11	0
Cross Country	0	Bylaw 12	1
Football	0	Bylaw 13	3
Men's Golf	0	Bylaw 14	0
Women's Golf	0	Bylaw 15	0
Rowing	1	Bylaw 16	0
Soccer	0	Bylaw 17	0
Softball	0	Bylaw 18	0
Swimming & Diving	1	Bylaw 20	0
Men's Tennis	0	Bylaw 31	0
Women's Tennis	0		4
Track & Field	1		
Volleyball	0		
	4		





Office of the Chancellor
325 Administration Building
554 University Street
Martin, TN 38238
office: (731) 881-7500
fax: (731) 881-7019

May 14, 2025

University of Tennessee Board of Trustees
Audit and Compliance Committee
c/o Ryan Stinnett, General Counsel
1169 UT Tower
505 Summer Place
Knoxville, TN 37902

RE: Annual Report to the Audit and Compliance Committee {BT0033 - Policy on Oversight of Intercollegiate Athletics}

Dear Members of the Audit and Compliance Committee:

I am pleased to provide this written statement outlining UT Martin's commitment to athletics compliance from a larger campus perspective and provide an overview of the information contained in UT Martin's annual report.

May this letter serve as my request for the Office of General Counsel to submit this annual report to the Audit and Compliance Committee of the UT Board of Trustees. Athletics compliance is considered of utmost importance at the University of Tennessee at Martin. The Athletics department devotes a significant amount of time to ensuring that all employees and constituents are educated on NCAA, OVC, and institutional regulations that could impact the institution, and specifically, our compliance within athletics.

While the institution employs a single full-time employee in the office of compliance, the Athletics academic staff and other members of Athletics administration are responsible for compliance duties to help facilitate monitoring of activities on campus and the actions of campus members that could impact compliance. Additionally, the UT System Office of General Counsel and the Office of Audit and Compliance assist with investigations, interpretations, and general advising of the compliance officer, when necessary.

Cross training is both intentional and vital to maintaining compliance on campus due to the limited full-time staff members devoted solely to compliance. However, the reporting of violations is handled by the compliance officer to ensure that the party most well-versed in legislation is

Members of the Audit and Compliance Committee

May 14, 2025

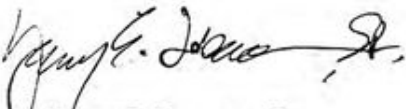
Page 2

responsible for reporting off-campus. These reports are also provided to the Athletics Director, Faculty Athletics Representative, and the Chancellor, in the event that the report is serious enough to warrant such reporting.

In May of 2025, the University of Tennessee at Martin entered into a negotiated resolution with the NCAA regarding a Level II-Mitigated violation that took place during the Spring 2023 term within the softball and soccer programs. The institution has worked tirelessly alongside the NCAA to resolve this matter and was awarded the mitigating factor of exemplary cooperation throughout the process. While the violations resulted in a finding of failure to monitor, the institution has taken steps prior to the final resolution to remedy the gaps identified in the compliance program. This includes the addition of a graduate assistant to the compliance staff, the implementation of additional compliance software to automate the monitoring of recruiting and other areas of compliance, additional policies and procedures in the affected areas, and additional rules education for the department. The department will serve the next year on probation, where the NCAA will continuously monitor the institution. The institution is also working in collaboration with the Office of Audit & Compliance to review policies and procedures in affected areas to ensure there are no other gaps that need to be addressed. While the Level II violations that were discovered and reported are disheartening, the resulting actions taken by the athletics department exemplify the commitment to continued compliance with NCAA regulations.

The Chancellor's oversight and support of the compliance office's efforts helps stress the importance to the rest of the campus. This statement and my corroborating actions shall serve as my attestation of commitment to athletics compliance on UT Martin's campus, and I will continue to act in a way that will further campus compliance.

Sincerely,



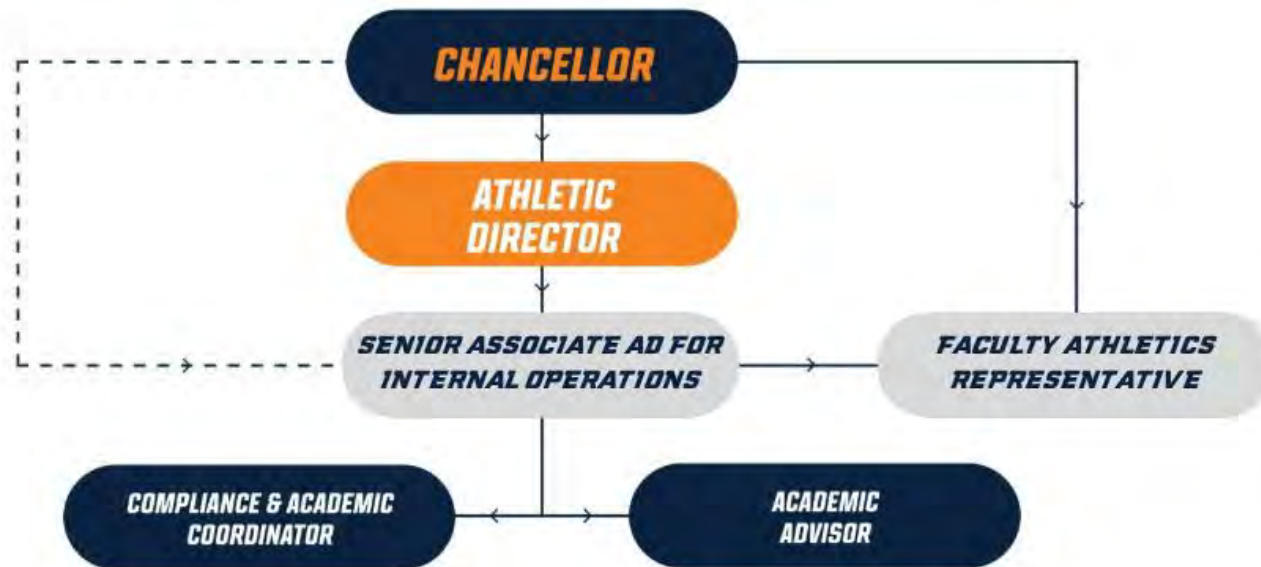
Dr. Yancy E. Freeman, Sr.
Chancellor

js



COMPLIANCE STAFF ORGANIZATIONAL CHART

(as of 5/13/2025)





UT MARTIN SKYHAWKS
DEPARTMENT OF INTERCOLLEGIATE ATHLETICS

Violations

Bylaw	Sport	Case Type	Date
12.5.1.6	Men's Basketball	Camps	May 2024
13.1.1.4	Football	Recruiting; Impermissible Contact	April 2025
13.1.1.2	Football	Recruiting; Financial Aid Agreements	January 2025



Violations

- Case No. 020226 – Level II Violation

- Involved Bylaws: 10.01.1, 10.1, 15.3.2.3, 15.3.4.2, 13.4.1.1, 13.4.1, 13.1.1.1.5, 13.11.2.3, 13.7.1.2, 13.11.1, 13.11.1.2, 13.12.1.3, 13.1.1.1.1, 13.4.1.2, 13.11.2.4, 11.1.1.1
- Involved Sports: Women's Soccer & Softball
- Penalties:
 - One year of probation (May 2, 2025-May 2, 2026)
 - Fine: \$25,000
 - Reduction of one women's soccer scholarship for 25-26
 - Two-week recruiting ban for softball staff during the 24-25 academic year
 - One-year show cause order for Coach Farmer, including a 5-game suspension (served in February of 2025)



OVC Peer Comparison for Compliance Staff

School	Full-Time Positions
Eastern Illinois University	2
Lindenwood University	2
University of Arkansas Little Rock	3
Morehead State University	2
Southeast Missouri State University	2
Southern Illinois University-Edwardsville	3
University of Southern Indiana	2
Tennessee State University	2
Tennessee Tech University	2
University of Tennessee at Martin	1
Western Illinois University	2



UT MARTIN SKYHAWKS
DEPARTMENT OF INTERCOLLEGIATE ATHLETICS

Process of Violation Investigations

- The process of taking reports of violations and investigating potential NCAA violations starts with a report to the Associate AD for Internal Operations. All staff members within the athletics department know that if there is a report made to them, that the information should be relayed to the compliance office.
- Rules education is a key tool in this process, as keeping staff informed on the regulations is necessary in order for them to identify a possible violation in their respective area.
- Once the information is initially obtained, the compliance office will write up a report and begin an investigation if appropriate. The UT Office of General Counsel and/or the UT System Office of Audit & Compliance may become involved in the investigation if the suspected violation is more serious in nature, could expose the university to legal or compliance risk, or could constitute fraud, waste or abuse of university resources.
- Depending on the level of the violation, the compliance office will also notify the Athletic Director, the Faculty Athletics Representative, and, if necessary, the Office of General Counsel & Chancellor's Office. The majority of violations are Level III violations that are reported to the Athletic Director and the Faculty Athletics Representative upon intake of the report. Level I/II violations will be reported to the Athletic Director, the Faculty Athletics Representative, the Office of General Counsel, and the Chancellor. Additional parties that may be notified can depend on the nature of the violation (i.e. notification to the Title IX Coordinator if it involves gender inequity or assault).



UT MARTIN SKYHAWKS
DEPARTMENT OF INTERCOLLEGIATE ATHLETICS

Process of Violation Investigations cont.

- Once the initial report is taken and the proper parties are notified, the compliance office will begin interviewing any parties that were possibly involved in the violation. Upon completion of the interview process, the compliance office will confer with the Athletic Director on the plan of action for the particular situation. If the alleged violation is more serious in nature and requires involvement of the Office of General Counsel and/or the Office of Audit & Compliance, the investigative process will be led by those parties, with the compliance office serving as the main point of contact within the department.
- In the event of a Level III violation to be handled strictly by the compliance office, the conclusion of the investigation will then result in a determination of appropriate action. This can range from a determination that no violation occurred, to the requirement that the report be forwarded to the conference office and the NCAA.
- Regardless of the actions taken after the initial investigation, additional rules education will be provided to the staff members in question. Even if there is no violation, the education provides a preventative measure that allows for the parties in question to avoid any future reports of possible violations in the same realm.
- Once a decision is handed down from the NCAA, if reported, the compliance office will ensure that the staff complies with any punishment that is assessed.



THE UNIVERSITY OF TENNESSEE BOARD OF TRUSTEES

4

AGENDA ITEM SUMMARY

Meeting Date: July 1, 2025
Committee: Audit and Compliance
Item: **Consent Agenda**
Type: Information

Background Information

There are no action items on the Committee Consent Agenda for approval; however, certain information 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. 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 Chief Audit and Compliance Officer before the meeting. Unless there is a request to remove an information item for review or discussion, the information items will be deemed to be accepted.



May 30, 2025

To: Decosta Jenkins
 Chair of the Audit and Compliance Committee
 University of Tennessee Board of Trustees

Subject: Research Security Program Report

Chairman Jenkins,

Tennessee state law (TN Code § 49-7-188) requires that public institutions of higher education establish a policy for research security. The purpose of which is to provide assurances and safeguards for the integrity of the research enterprise while bolstering a proactive culture of compliance. The statute further requires “[t]he governing board of each public institution of higher education shall submit a report on the institution's compliance with this section no later than July 1, 2025, to the chairs of the education committee of the senate and the education committees of the house of representatives.”

Regarding policy, Tennessee state law states that:

- **(b)** Each research security policy must:
 - **(1)** Comply with all applicable legal, regulatory, and contractual standards and requirements for securing and protecting the institution's academic research enterprise, including, as applicable, any research involving the institution, its campuses, and its applicable internal components;
 - **(2)** Promote an institutional culture of compliance with the institution's research security policy consistent with federal regulations to ensure that the institution maintains eligibility for federal funding, including, as applicable, federal risk mitigation requirements pertaining to standardized disclosures, cybersecurity, foreign travel security, insider threats, and export controls;
 - **(3)** Address:
 - **(A)** Efforts to maintain publicly accessible contact information;
 - **(B)** Processes to regularly update the institution's research security policy; and
 - **(C)** The establishment of internal processes to ensure compliance with, and reporting within, the institution's research security policy;
 - **(4)** Distribution of communications, state and federal, on research security matters concerning the institution's academic research enterprise, including, as applicable, any research involving the institution, its campuses, institutes, and its applicable internal components; and
 - **(5)** Processes to identify and address compliance concerns at the institution that are consistent with the institution's research security policy.

The Board of Trustees adopted BT0033 – Policy on Research Security effective October 25, 2024, and the policy is publicly posted. This policy provides for compliance with the statute and is attached as supporting evidence of compliance for reporting to the State of Tennessee.

Activities are ongoing in support of the research security program. As required by policy BT0033, Research Security Officers have been appointed for each campus and the Institute for Public Service. The Research Security Council has also been established and is comprised of the Research Security Officers along with the Chief Research Officers of each campus and system representatives. The council has met 6

times, beginning in January 2025 and has initiated a systematic evaluation of policies, activities and procedures related to research security. The council has also engaged outside expertise to provide an independent assessment and guidance for program enhancements.

Sincerely,



Sarah T. Pruett, PhD
Executive Director of Institutional Compliance



Kari Babski-Reeves
Associate Vice President for Research

cc: Randy Boyd, President
Brian Daniels, Chief Audit and Compliance Officer
Cynthia Moore, Secretary, Board of Trustees
Bernard Savarese, Vice President for Academic Affairs, Research, and Student Success
Ryan Stinnett, General Counsel

The University of Tennessee
Audit Plan Status - May
For the Year Ending December 31, 2025

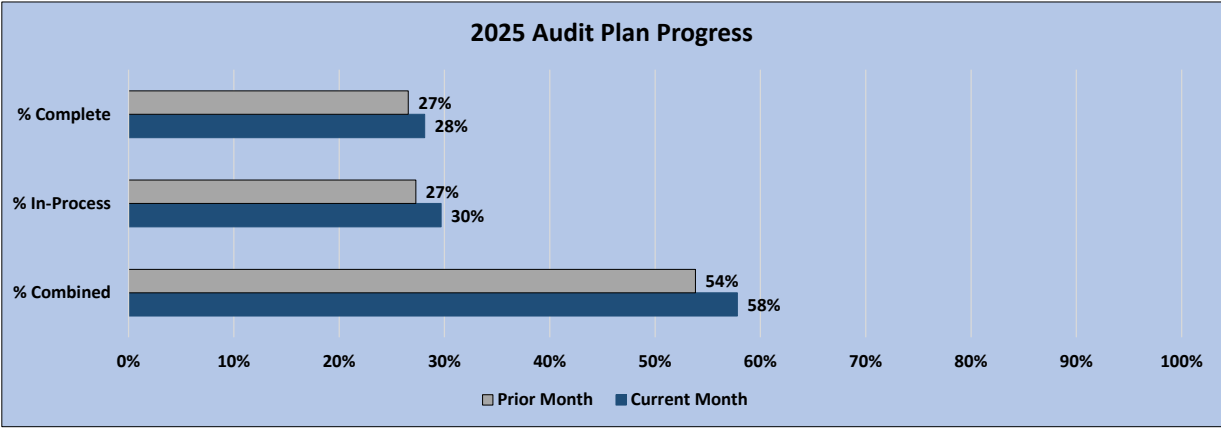
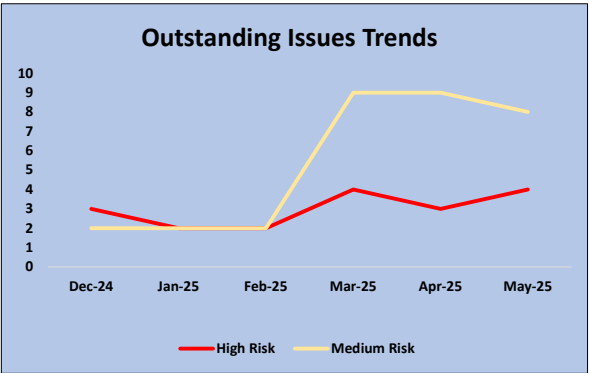
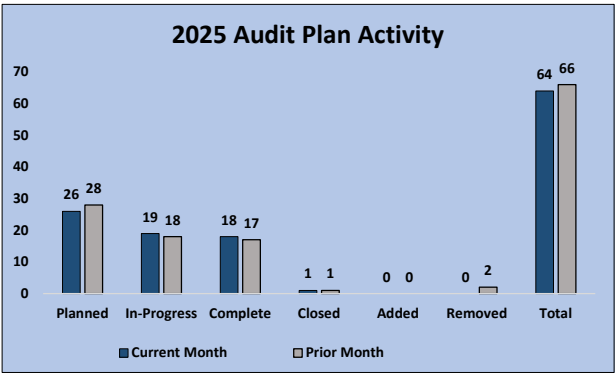
Audit Engagements	Campus	Status
Lab Safety (carryover)	UTC	Complete
4-H Center Operations (carryover)	UTK/UTIA	Complete
Facilities - Policy Compliance (carryover)	UTHSC	Complete
No Leave Monitoring (carryover)	UTC	Complete
Police Department Accreditation Audit (carryover)	UTM	Complete
UTC Police Department (carryover)	UTC	Complete
Capital Construction Audit - Outsourced (carryover)	UTSA/UTC	In-Progress
ADA Compliance	System-wide	In-Progress
ADA Compliance	UTK/UTIA/IPS/UTSI	In-Progress
ADA Compliance	UTM	In-Progress
ADA Compliance	UTC	In-Progress
ADA Compliance	UTHSC	In-Progress
ADA Compliance	UTS	In-Progress
Deferred Maintenance	System-wide	In-Progress
Deferred Maintenance	UTM	In-Progress
Deferred Maintenance	UTS	In-Progress
Deferred Maintenance	UTC	In-Progress
Deferred Maintenance	UTHSC	In-Progress
Deferred Maintenance	UTIPS	In-Progress
Deferred Maintenance	UTK/UTIA/UTSI	In-Progress
Temporary Processes Outside of DASH	UTSA	Planned
Capital Projects Management - Outsourced	System-wide	Planned
Athletics Camps and Clinics	UTM	Planned
Extension Shooting Sports	UTK/UTIA	In-Progress
IT: Asset Management	UTK	Planned
IT: Windows Administration	UTK	In-Progress
2025 CTA	System-wide	Planned
Office of the President	UTSA	Planned
Office of the Chancellor	UTK	Planned
Office of the Chancellor	UTHSC	Planned
Ohio Valley Conference Special Assistance Funds	UTM	Planned
PCA - Administrative Division	UTC	Planned
PCA - Academic Division	UTK	Planned
PCA - Academic Division	UTM	Planned
PCA - Academic Division	UTHSC	Planned
PCA - Administrative Division	UTS	Planned
PCA - IT Policy	UTSA	Planned

Consulting Engagements	Campus	Status
DASH System Implementation (Co-Sourced) (carryover)	System-Wide	Closed
Lab Safety (carryover)	UTS	Complete
Campus Procedure Review (carryover)	UTS	Complete
College of Social Work - Cash and Gift Card Controls (carryover)	UTK	Complete
Continuity Readiness - UT System Summary (carryover)	System-Wide	Complete
Continuity Readiness - UT IPS (carryover)	IPS	Complete
Continuity Readiness - UTSI (carryover)	UTK/UTSI	Complete
Continuity Readiness - UTK (carryover)	UTK	Complete
Continuity Readiness- UTC (carryover)	UTC	Complete
Continuity Readiness - UTS (carryover)	UTS	Complete
Continuity Readiness - UTHSC (carryover)	UTHSC	Complete
Continuity Readiness - UTIA AgResearch & Extension (carryover)	UTK/UTIA	Complete
Continuity Readiness - UTM (carryover)	UTM	Complete
HERD Data Collection Process (carryover)	System-Wide	In-Progress
Internal Controls Mapping - Procurement	System-Wide	Planned
Internal Controls Mapping	System-Wide	Planned
Internal Controls Mapping	System-Wide	Planned
Internal Controls Mapping	System-Wide	Planned
Internal Controls Mapping	System-Wide	Planned
Cash Equivalent Controls	System-Wide	Planned
Admissions/Enrollment	UTS	Planned
Admissions/Enrollment	UTC	Planned
Athletics Fundraising and Cash Collections	UTM	In-Progress
Student Mental Health Services	UTC	Planned
Student Mental Health Services	UTHSC	Planned
Construction Costs - Outsourced	System-Wide	Planned
Animal Care and Use	UTK/UTIA	In-Progress

Audit and Compliance
Audit Plan Overview - May
For the Year Ending December 31, 2025

Audit Report Priority Legend	
Low	A report with no reportable observations. Low-Risk observations identified are informally communicated to management.
Medium	A report with only Medium-Risk observations. Prompt action is required by management to mitigate the identified risk.
High	A report including at least one High-Risk observation. Immediate action is required, guided by senior management, to mitigate the identified risk.

Audits and Consultations Completed in Month			
Title	Campus	Type	Priority
Facilities - Policy Compliance (carryover)	UTHSC	Audit	High



2025 REPORT

4.3



TITLE IX



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Policies and Procedures 10

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Our Team

Title IX Team 13

An electronic version of this report
can be accessed online:

titleix.tennessee.edu

INTRODUCTION

“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

The University of Tennessee established a systemwide Title IX Office in 2017 to enhance its efforts to build a model Title IX commitment on UT's campuses statewide.

The office collaborates with UT campus Title IX officials in developing and evaluating policy, measuring program effectiveness, and identifying optimal training, prevention, and awareness-building efforts and resources for their implementation. The office is also responsible for tracking best practices and legal developments and for annual reporting.

The Office of Title IX publishes this annual report each year to provide a transparent summary of our work, increase awareness of education, prevention, and support initiatives, highlight the dedicated work of our campus staff members and their community partners, and ensure ongoing accountability to those we serve.



We continue to utilize the benefits of a state-wide system and work closely with our campus Title IX Coordinators. Once again, we will host our annual UT Systemwide Title IX Roundtable this summer to meet annual compliance requirements and support collaboration.

As the regulatory landscape continues to evolve, the ongoing work of cultivating a safe and nondiscriminatory learning, living, and working environment belongs to us all.

Respectfully,

Ashley Blamey, Title IX Compliance Coordinator

OUR MISSION

Our Mission

Our mission is to serve the University of Tennessee community through our comprehensive Title IX Commitment by ensuring access to education programs and activities free of sex-based discrimination.

Our History

Since Title IX's enactment in 1972, the University of Tennessee has worked to ensure institutional compliance with its federal requirements. Each campus and institute has established systems, policies, and processes that have evolved over time, in accordance with revised federal guidance and court rulings. Additionally, as expectations for how institutions of higher education address, respond to, and remedy instances of sex-based harassment 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 released observations and recommendations in June of 2017 for university review.
- In November of 2018, the Department of Education published proposed Title IX regulations.
- The final Title IX regulations went into effect on August 14, 2020. In preparation for complying with the new regulations, the UT Office of Title IX worked collaboratively with campuses to incorporate the regulatory requirements into existing campus policy while responding to both campus needs and community expectations for compliance.

- The System developed a templated Policy on Sexual Harassment, Sexual Assault, Dating and Domestic Violence, and Stalking for use by all campuses, which produced shared definitions and a common framework while also allowing for customization and localization by each campus and institute as required by its own resources and jurisdiction.
- The 2020 regulation, in addition to the independent commission's report, served to guide the Office of Title IX's strategic plan to enhance Title IX compliance across the UT System. Enhancements include:
 - *Creation of a UT System Office of Title IX in 2017 to provide a system-wide Title IX coordinating presence and support cross-system Title IX compliance*
 - *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*
 - *System-wide Title IX employee training*
 - *System-wide guidance and support for conducting federally compliant Title IX Hearings*
- In 2024, following the rule making process, new Title IX regulations were published with an implementation date of August 1, 2024. The Office of Title IX worked with our systemwide partners to develop a timeline and draft policy and prevention materials. A federal court issued a preliminary injunction on June 17, 2024.

- In 2025, a federal judge vacated the 2024 regulations, and the Department of Education confirmed the 2020 regulations were the governing rules. The University of Tennessee never implemented the 2024 regulations and has remained compliant with the 2020 regulations since implementation.

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:



Policy: Our foundation is in the policy and procedures we follow.

Prevention & Education: Our goal is to prevent sexual misconduct, relationship violence, stalking, and retaliation before they happen.

Support & Interim Measures: Our promise is to provide support and appropriate supportive measures to individuals involved in the Title IX process.

Investigation & Resolution: Our commitments to due process, campus safety, and encouraging reporting guide how we investigate and resolve reports.

Patterns & Trends: Our responsibility is to use the best available research, evidence-based practices, and our own campus and institute trends in our prevention and response efforts.

OUR WORK

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 and supports the utilization of best practices throughout the UT system.

The Office of Title IX supported system-wide Title IX compliance through the following ongoing and completed objectives:

- Developed draft policy, procedures, and prevention materials for pending 2024 regulatory compliance requirements.
- Hosted cross system teams to facilitate communication and ensure clarity on compliance expectations during shifting regulatory guidance.
- Submitted the required 2024-2025 System Title IX Implementation Plan to the Comptroller of the Treasury.
- Submitted the required 2024-2025 System Title IX Implementation Plan to the Comptroller of the Treasury.
- Supported campus level investigations and adjudications with coordination of Hearing Officers.
- Hosted the annual system-wide training required by the Title IX regulations to ensure system wide compliance without cost to campuses.

In the spring of 2019, UT developed a standard format for reporting and tracking Title IX-related data across the System. The University updated its recordkeeping systems to comply with the terms and definitions under revised Title IX policies. The information collected by each campus is published in a campus Annual Title IX Report. Campus Title IX annual reports can be accessed online via the following campus links:

[UT KNOXVILLE](#)

[UT CHATTANOOGA](#)

[UT MARTIN](#)

[UT SOUTHERN](#)

[UT HEALTH SCIENCE CENTER](#)

Policies and Procedures

[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 Southern](#)

[University of Tennessee Health Science Center](#)

OUR WORK

In addition to the policies referenced on page 10, the University's Chattanooga and Knoxville campuses have dedicated Student Pregnancy Accommodations policies. The policies can be found online:

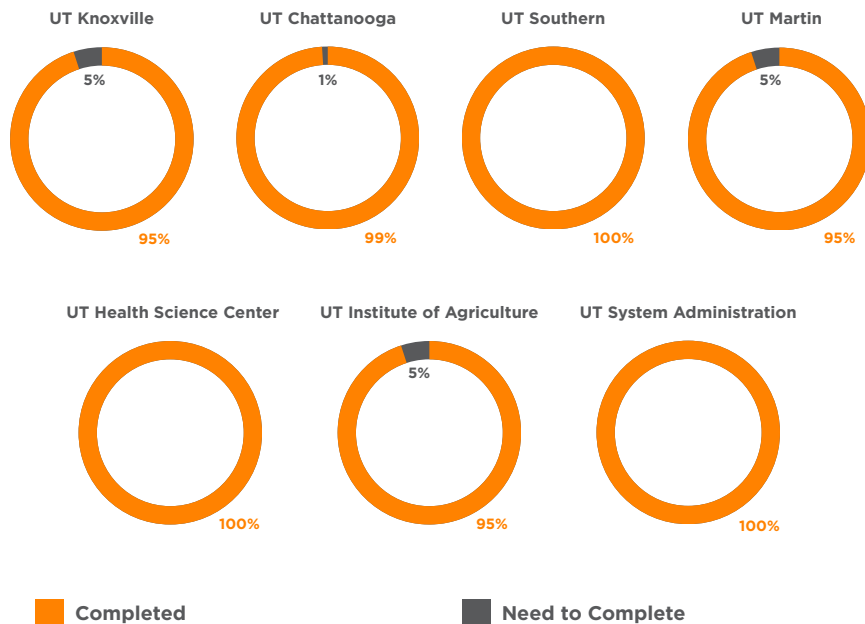
[UTK - Student Pregnancy Accommodations](#)

[UTC - Student Pregnancy Accommodations](#)

Mandatory Reporter Training

Federal law requires UT System campuses to designate at least some employees as officials with the authority to respond to known reports of sexual harassment. UT policy refers to such officials as "Mandatory Reporters," and nearly all campus employees (generally only excluding employees deemed confidential by licensure) serve as Mandatory Reporters when reports concern students. The policy requires Mandatory Reporters to forward reports or information about alleged sexual harassment or sexual violence under the policy to the campus' Title IX Coordinator for review. Such referrals provide the Title IX Coordinators the ability to contact alleged complainants with care and support resources, safety information, and options for reporting to police or a university investigator, and ensure our ability to monitor patterns and trends. Providing annual training to Mandatory Reporters is the foundation of building a culture of compliance.

UT campuses clearly communicated training requirements for the 2024 – 2025 academic year and routinely encouraged employees to complete the training. Such efforts resulted in the following strong training completion rates for fulltime staff and faculty as well as members of the UT System:



OUR TEAM

Title IX Team



Ashley Blamey

TITLE IX COMPLIANCE COORDINATOR
UNIVERSITY OF TENNESSEE SYSTEM ADMINISTRATION
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 facilitates 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.

OUR TEAM



Anitra Barrett

*DIRECTOR OF TITLE IX COMPLIANCE AND TITLE IX COORDINATOR
UNIVERSITY OF TENNESSEE AT CHATTANOOGA*

anitra-barrett@utc.edu

Anitra Barrett is the Director of Title IX Compliance and the Title IX Coordinator for the University of Tennessee at Chattanooga's (UTC) Office of Title IX Compliance. Barrett began working at UTC in 2016 as the Manager of Communications and Clery Compliance at the UTC Police Department. She later joined UTC's Office of Equal Opportunity and Accessibility in December 2020.

Before joining UTC, Barrett served as the Civil Rights Investigator at the County of Riverside Department of Public Social Services (DPSS) in Riverside, California. Barrett earned her Juris Doctorate from North Carolina Central School of Law and Bachelor of Arts in English from North Carolina Central University in Durham, NC.



Sarah Catherine Richardson

*DEAN OF STUDENTS AND TITLE IX COORDINATOR
UNIVERSITY OF TENNESSEE SOUTHERN*

scrich@utsouthern.edu

Sarah Catherine Richardson became Title IX Coordinator at the former Martin Methodist College in October 2019, and, upon the creation of UT Southern, continued in that role beginning in July 2022. Richardson also serves UT Southern as the Dean of Students.

Before joining UT Southern, Richardson worked at Saint Anselm College in Manchester, New Hampshire, and Boston College in Chestnut Hill, Massachusetts. Originally from Mississippi, she earned both her bachelor's and master's degrees from Boston College before relocating back down south.



Michael Alston

*ASSOCIATE VICE CHANCELLOR FOR ACCESS AND ENGAGEMENT
TITLE IX COORDINATOR
UNIVERSITY OF TENNESSEE HEALTH SCIENCE CENTER*

malston@uthsc.edu

Michael Alston, EdD, CCDP/AP, has dedicated 30+ years of service to the university. He has worked at UT Martin and UT Knoxville and currently serves as the UT Health Science

Center's Associate Vice Chancellor for Access and Engagement and leader of the Office of Access and Compliance.

Alston's professional experience in higher education encompasses residence life administration, student recruitment and admissions, undergraduate instruction and training, employee relations, student conduct administration, compliance, and access.

Dr. Alston is an alumnus of UT-Martin, where he earned a BS in Psychology and an MS in Educational Psychology. He also earned a doctorate from Peabody College at Vanderbilt University.



Dominique Ross

*DIRECTOR OF ACCESS, COMPLIANCE, AND TITLE IX
TITLE IX COORDINATOR
UNIVERSITY OF TENNESSEE MARTIN*

dcrock12@utm.edu

Dominique Ross began her service as UT Martin's (UTM) Director of Access, Compliance, and Title IX in February of 2022.

Before joining UTM, Ross served as the Assurance Officer at the UT Health Science Center (UTHSC), and several years in governmental health administration for the Louisiana Department of Health. Ross earned a bachelor's degree from Southern University and A&M College and a master's from Louisiana State University.



To learn more or become involved with our work visit:
titleix.tennessee.edu or contact Title IX Compliance Coordinator
 Ashley Blamey at ashleyblamey@tennessee.edu.

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

[University of Tennessee, Knoxville](#)

[University of Tennessee at Chattanooga](#)

[University of Tennessee at Martin](#)

[University of Tennessee Southern](#)

[University of Tennessee Health Science Center](#)



THE UNIVERSITY OF
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<https://titleix.tennessee.edu>



Outstanding High-Priority Audit Issues

As of May 31, 2025

**Internal Audit will follow up with management to confirm remediation status when due.*

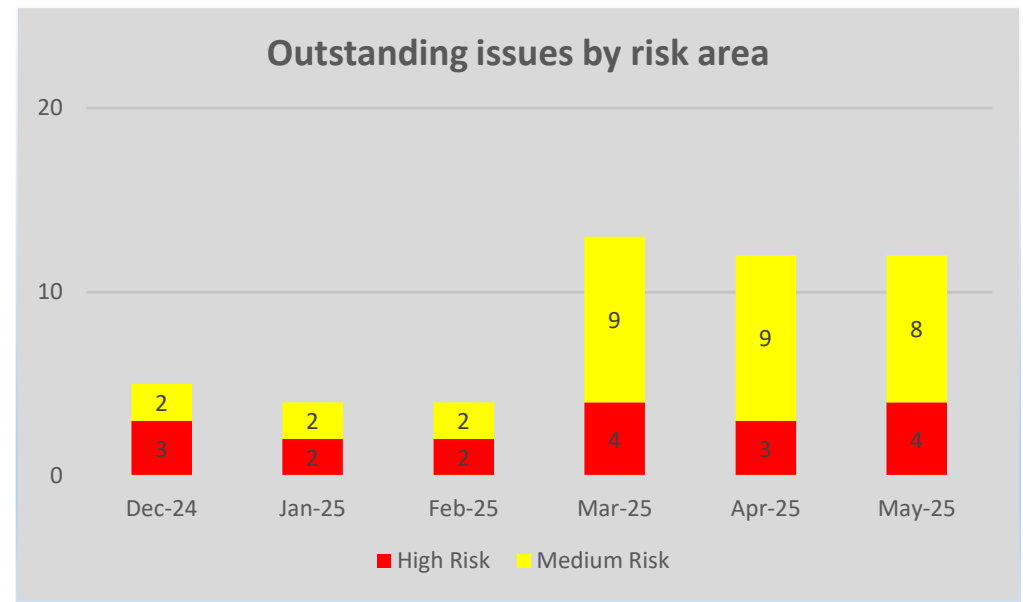
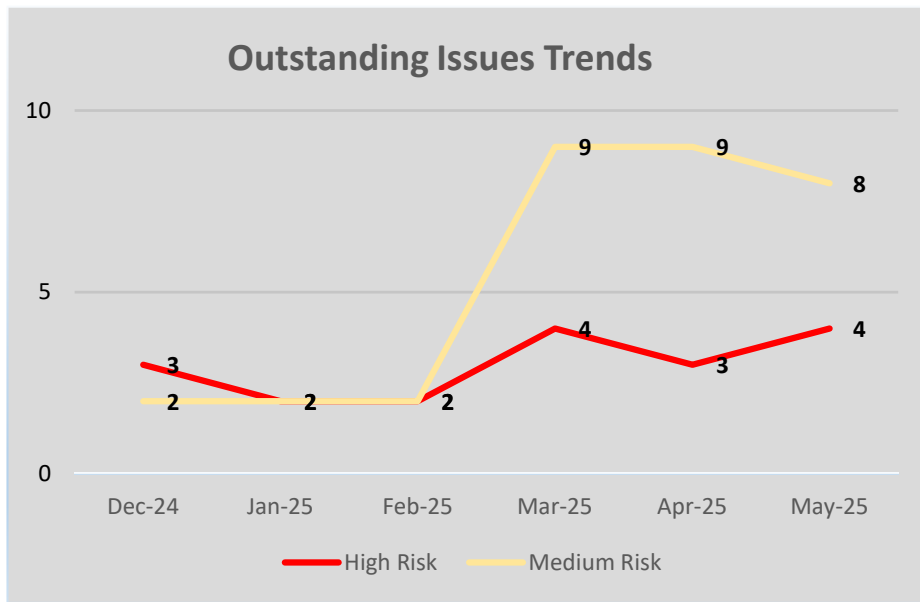
***This remediation item timeline was impacted by the availability of DASH functionality*

	Campus	Audit	Issue	Report Date	Expected Remediation Date*	Revised Remediation Date
1	UTC	College of Engineering & Computer Science	Lack of Expenditures Review	9/23/2024	10/31/2024	7/31/2025**
2	UTC	Lab Safety	Lack of Equipment Maintenance	3/13/2025	4/30/2025	8/29/2025
3	UTM	Police Department Accreditation Audit	Incomplete Evidence Room Inventory	3/24/2025	8/31/2025	N/A
4	UTHSC	Facilities – Policy Compliance	Equipment Inventory Variances	5/12/2025	6/30/2025	N/A



Issues by Priority Rating

As of May 31, 2025





Institutional Compliance Plan Update July 2025

Sarah Pruett, PhD
Executive Director of
Institutional Compliance



THE UNIVERSITY OF
TENNESSEE
SYSTEM

Institutional Compliance Plan 2025



Education

Internal and external for depth and expertise to serve with excellence



Collaboration & Connected Risk

Leverage partnership with audit for optimal outcomes



Monitor & Communicate

Work across the system for rapid change management

Institutional Compliance: Policy Development Status

Environmental
health and
safety

Pending final review and
approval

Emergency
management

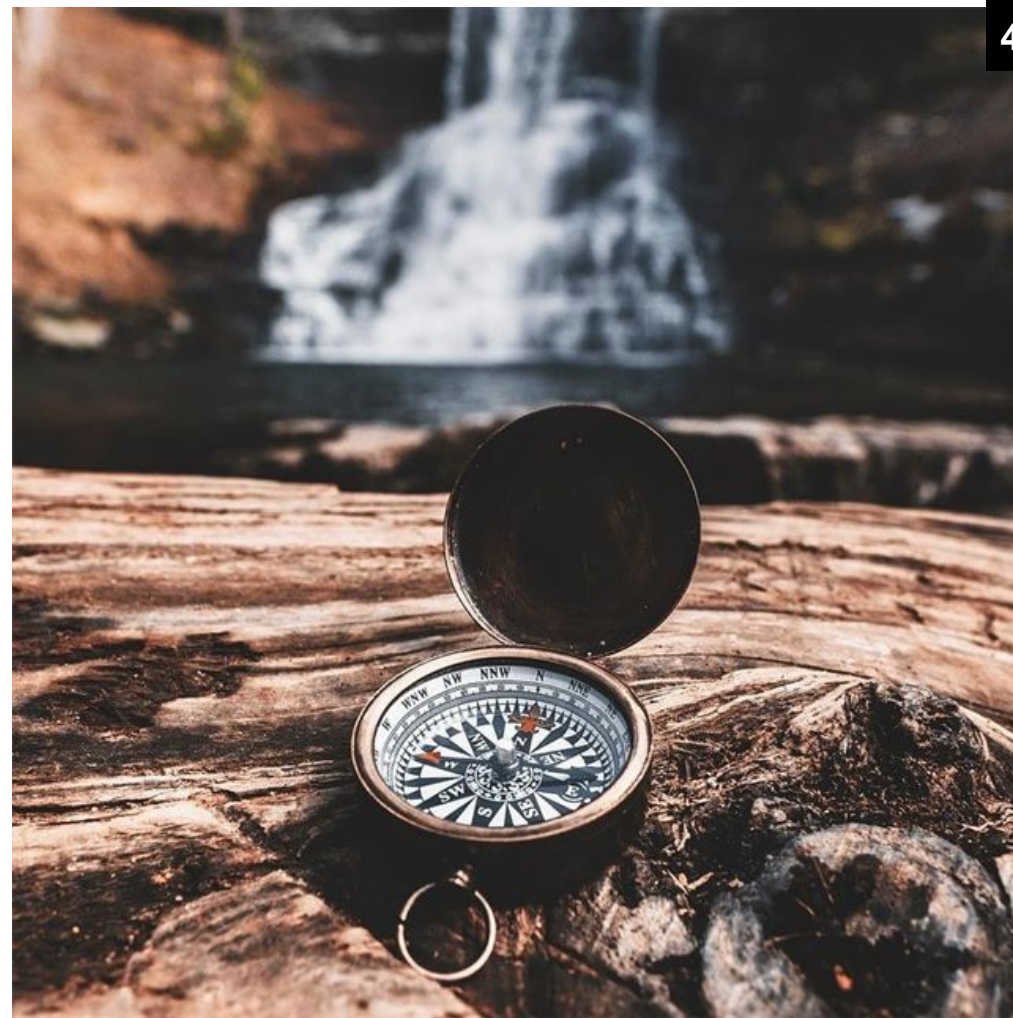
Pending final review and
approval

Continuity

Draft policy and
stakeholder guidance
materials in development

Institutional Compliance: Risk Assessment Status

- Pilot framework in development with UTK.
- Risk assessment for UTC in planning phase with summer campus training and fall launch.
- UTS committee training and orientation complete. Launch fall 2025.
- IPS and UTM initial data collection 100% complete and under committee review.



4.5



Institutional Compliance: Research Update

- Research Security Program
 - Security council representatives appointed
 - Program review and supplemental policy development underway with guidance from external consultant
- Conflict of Interest software launched January 2025
 - Systemwide training materials are being updated and townhall educational event scheduled for August 2025.
 - Annual disclosure cycle with all campuses and institutes aligned begins on September 2, 2025.
- Effort Certification software launched May 2025



MEMORANDUM

TO: Audit and Compliance Committee
Mr. John Compton, Chair of the Board of Trustees
Mr. Decosta Jenkins, Chair, Audit and Compliance Committee
Mr. Bill Rhodes, Chair, Finance and Administration Committee

FROM: Mr. Luke Lybrand *LL*

DATE: May 30, 2025

SUBJECT: Travel Exception Report

The Board of Trustee'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 ending March 31, 2025, 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. David Miller
Mr. Brian Daniels
Ms. Cindy Moore