



THE UNIVERSITY OF TENNESSEE BOARD OF TRUSTEES

AUDIT AND COMPLIANCE COMMITTEE	
Monday, June 29, 2026	Gault Fine Arts, UT Southern
3:30 p.m. (CDT) / 4:30 p.m. (EDT)	Pulaski, TN

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 Statistics Update](#)..... Tab 2
- V. [UT Southern Public Safety Update](#)..... Tab 3
- VI. [Internal Audit AI Update](#) Tab 4
- VII. [NCAA Compliance Update](#) Tab 5
- VIII. [Proposed Litigation Settlement - Action](#) Tab 6
- IX. [Consent Agenda](#)..... Tab 7
 - Information Items
 - A. [Research Security – Implementation Report](#) Tab 7.1
 - B. [Internal Audit - Quality Assessment Review - Self-Assessment](#)..... Tab 7.2
 - C. [2026 System Title IX Report](#) Tab 7.3
 - D. [2026 Audit Plan Update](#)..... Tab 7.4
 - E. [Outstanding Audit Issues](#)..... Tab 7.5
 - F. [Institutional Compliance Update](#)..... Tab 7.6
 - G. [Travel Exception Report](#) Tab 7.7
- X. 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.]
- XI. 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; and/or
- Items not subject to public inspection or other matters, as may be permitted under state law.



THE UNIVERSITY OF TENNESSEE BOARD OF TRUSTEES

MINUTES OF THE AUDIT AND COMPLIANCE COMMITTEE February 26, 2026

The Audit and Compliance Committee of The University of Tennessee Board of Trustees met at 3:30 p.m. (CST) on Thursday, February 26, 2026. The meeting was held at the University's system administration office located at the UT Tower, Plaza Level, 400 W. Summit Hill Drive, Knoxville, Tennessee.

Committee Members Present: Decosta E. Jenkins (Committee Chair); John C. Compton (Board Chair); Bradford D. Box; and T. Lang Wiseman.

Other Trustees Present: Hon. William E. Haslam; Ashlee C. Mallon (Student Trustee); Shanea A. McKinney; William C. (Bill) Rhodes III; Donald J. Smith; J. David Wade; David N. Watson; and Jamie R. Woodson.

University Administration: President Randy Boyd; Brian Daniels, Chief Audit and Compliance Officer; David Miller, Senior Vice President and Chief Financial Officer; Cynthia C. Moore, Board Secretary and Special Counsel; C. Ryan Stinnett, General Counsel; Chancellor Melinda Arnold (UT Southern); Chancellor Lori Mann Bruce (UT Chattanooga); Chancellor Peter Buckley (UT Health Science Center); Chancellor Yancy Freeman (UT Martin); and Chancellor Donde Plowman (UT Knoxville). Additional members of the UT senior leadership and staff were also in attendance.

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 called the meeting to order and welcomed everyone to the meeting.

Requests to Address the Board

There were no requests to address the Board assigned to be heard by the Committee.

Approval of the Minutes

Committee Chair Jenkins noted that the minutes of the prior meeting were included in the meeting materials (Tab 1). Upon motion duly made and seconded, the Committee approved the minutes as presented.

2026 Institutional Compliance Plan

Chief Audit and Compliance Officer Brian Daniels introduced the proposed 2026 Institutional Compliance Plan and noted that Committee approval is required under the Committee Charter. Dr. Sarah Pruett, Executive Director of Institutional Compliance, presented the plan. Dr. Pruett began by highlighting significant accomplishments from 2025, including the successful implementation of a systemwide outside interest disclosure process for faculty and staff, development of a new compliance risk assessment structure, and completion of continuity of operations plans across all campuses and institutes.

She explained that the 2026 plan is organized around a connected, risk-based approach emphasizing ethics and outreach, policy development and revision, enhanced compliance monitoring, and staff development. She discussed efforts to strengthen privacy awareness training, prepare for new ADA digital accessibility requirements, coordinate policy review activities with the Office of General Counsel, and implement a new risk-based compliance assessment process utilizing proactive monitoring techniques.

Dr. Pruett also reviewed initiatives in research compliance, including monitoring changes in federal and state regulations, strengthening research security policies, implementing award certification monitoring, and expanding staff expertise in research compliance. She concluded with an overview of environmental health and safety initiatives, including continuity plan exercises, policy development, performance metrics, and a statewide peer review process for campus environmental health and safety programs.

In response to questions from Committee members, Dr. Pruett discussed the resources available to implement the plan and identified ADA web accessibility compliance as one of the University's most significant compliance challenges because of its systemwide impact on websites, instructional materials, and learning management systems.

Upon motion duly made and seconded, the Committee approved the 2026 Institutional Compliance Plan (Tab 2 of the meeting materials).

2026 Internal Audit Plan

Mr. Daniels introduced the 2026 Internal Audit Plan and recognized Andrea Addis for leading development of the proposed plan before assuming her interim responsibilities as Treasurer. He also introduced James Hodge, who will serve as Interim Executive Director of Internal Audit.

Ms. Addis reviewed the department's strategic goals, which focus on operational excellence, measurable value, team excellence, and expanded information technology audit capabilities. She explained that the department has developed key performance indicators to measure audit quality, stakeholder value, professional development, and IT audit maturity.

She described the proposed audit plan as consisting of risk-based audits, annual audits, and advisory services, with increased emphasis on systemwide engagements aligned with enterprise risks. Audit priorities include research compliance, information technology controls, third-party risk management, Health Insurance Portability and Accountability Act (HIPAA) data security, internal controls, and advisory services supporting institutional risk management. Ms. Addis also discussed preparations for the department's required external quality assessment and continued quality assurance activities.

Committee members discussed the development of the department's performance measures and the role of artificial intelligence in both improving audit processes and providing assurance regarding institutional use of emerging technologies. Additional discussion focused on research freezer compliance and the importance of inventory management and backup systems to protect valuable research assets.

Upon motion duly made and seconded, the Committee approved the 2026 Internal Audit Plan (Tab 3 of the meeting materials).

Campus Safety - UT Health Science Center

Raaj Kurapati, Executive Vice Chancellor and Chief Operating Officer, and Chief Anthony Berryhill presented an overview of campus safety and security initiatives at the UT Health Science Center.

The presentation highlighted the institution's comprehensive approach to campus safety through investments in physical infrastructure, technology, personnel, and partnerships with local law enforcement agencies. Mr. Kurapati described ongoing efforts to better define the campus perimeter through fencing, improved signage, enhanced lighting, and parking security improvements designed to deter criminal activity in the surrounding urban environment.

The presenters discussed continued investments in technology, including approximately 3,000 security cameras across campus, enhanced emergency operations capabilities, and evaluation of artificial intelligence applications to strengthen campus monitoring and response. The Committee also received an overview of organizational structures supporting campus safety and emergency preparedness.

Committee discussion emphasized the importance of maintaining a secure campus environment despite challenges associated with the surrounding community and highlighted the institution's continued progress in reducing campus crime and improving overall safety.

Enterprise Risk Overview

Mr. Daniels presented an overview of the University's enterprise risk assessment process and summarized the results of a recent systemwide risk assessment involving more than 100 institutional stakeholders.

The presentation compared the University's top enterprise risks with national higher education trends identified through a survey conducted by United Educators. Areas of continuing significance included enrollment management, cybersecurity and data security, public safety, athletics, and student information systems. Mr. Daniels noted that several risks, including public safety and athletics, rank higher within the University than nationally, reflecting the institution's particular operational environment and priorities.

The Committee discussed the value of monitoring enterprise risk trends over time to inform strategic planning and oversight activities.

2025 Financial and Compliance Audit Report

Committee Chair Jenkins reported that the University's annual financial and compliance audit had been completed by the Tennessee Comptroller's Office. The Committee received and accepted the report.

Consent Agenda

Committee Chair Jenkins called the Committee's attention to the informational items included in the Consent Agenda (Tab 6), including:

- External Audit – Management Representation Letter; and
- Travel Exception Report.

No items were removed from the Consent Agenda for separate discussion.

Other Business and Executive Session

With no further public business before the Committee, Committee Chair Jenkins announced that the Committee would meet in non-public executive session in accordance with Tennessee Code Annotated § 4-35-108 to review confidential matters, including audits, investigations, and litigation. The public portion of the meeting was adjourned.

Respectfully Submitted,

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



THE UNIVERSITY OF TENNESSEE BOARD OF TRUSTEES

AGENDA ITEM SUMMARY

Meeting Date: June 29, 2026

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



THE UNIVERSITY OF
TENNESSEE
SYSTEM

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**

UT Knoxville

	2025	Rate Per 1000	2024	Rate Per 1000	2023	Rate Per 1000
Homicide Offenses	0	0	0	0	0	0
Kidnapping/Abduction	2	0	1	0	0	0
Sex Offenses (Forcible)	1	0	4	0.1	6	0.1
Robbery	0	0	0	0	0	0
Assaultive Offenses	55	1.3	40	0.9	26	0.6
Arson	0	0	0	0	0	0
Extortion/Blackmail	4	0.1	1	0	3	0.1
Burglary	25	0.6	6	0.1	14	0.3
Larceny/Theft Offenses	76	1.8	98	2.2	71	1.7
Motor Vehicle Theft	7	0.2	4	0.1	11	0.3
Counterfeiting/Forgery	19	0.4	28	0.6	1	0
Fraud Offenses	43	1	30	0.7	5	0.1
Embezzlement	0	0	0	0	1	0
Stolen Property Offenses	2	0	0	0	2	0
Destruction/Damage/Vandalism	34	0.8	35	0.8	31	0.7
Drug/Narcotic Violations	315	7.5	252	5.7	188	4.5
Pornography/Obscene Material	1	0	1	0	0	0
Gambling Offenses	0	0	1	0	0	0
Weapon Law Violations	31	0.7	41	0.9	14	0.3

UT Chattanooga

	2025	Rate Per 1000	2024	Rate Per 1000	2023	Rate Per 1000
Homicide Offenses	0	0	0	0	0	0
Kidnapping/Abduction	0	0	0	0	0	0
Sex Offenses (Forcible)	7	0.5	0	0	1	0.1
Robbery	1	0.1	0	0	1	0.1
Assaultive Offenses	18	1.3	32	2.4	28	2.2
Arson	0	0	0	0	1	0.1
Extortion/Blackmail	2	0.1	7	0.5	4	0.3
Burglary	9	0.7	2	0.2	6	0.5
Larceny/Theft Offenses	80	5.9	80	6.1	93	7.2
Motor Vehicle Theft	8	0.6	10	0.8	3	0.2
Counterfeiting/Forgery	7	0.5	0	0	0	0
Fraud Offenses	3	0.2	2	0.2	8	0.6
Embezzlement	0	0	0	0	0	0
Stolen Property Offenses	1	0.1	0	0	0	0
Destruction/Damage/Vandalism	18	1.3	18	1.4	30	2.3
Drug/Narcotic Violations	59	4.3	42	3.2	36	2.8
Pornography/Obscene Material	1	0.1	1	0.1	0	0
Gambling Offenses	0	0	0	0	0	0
Bribery	1	0.1	0	0	0	0
Weapon Law Violations	6	0.4	2	0.2	0	0

UT Southern

	2025	Rate Per 1000	2024	Rate Per 1000	2023	Rate Per 1000
Homicide Offenses	0	0	0	0	0	0
Kidnapping/Abduction	0	0	0	0	0	0
Sex Offenses (Forcible)	1	0.8	0	0	0	0
Robbery	0	0	0	0	0	0
Assaultive Offenses	0	0	0	0	0	0
Arson	0	0	0	0	1	1
Extortion/Blackmail	0	0	0	0	0	0
Burglary	0	0	0	0	0	0
Larceny/Theft Offenses	2	1.5	1	0.9	4	3.9
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	1	0.8	0	0	0	0
Drug/Narcotic Violations	2	1.5	5	4.7	1	1
Pornography/Obscene Material	0	0	0	0	0	0
Gambling Offenses	0	0	0	0	0	0
Weapon Law Violations	2	1.5	0	0	0	0

UT Martin

	2025	Rate Per 1000	2024	Rate Per 1000	2023	Rate Per 1000
Homicide Offenses	0	0	0	0	0	0
Kidnapping/Abduction	0	0	0	0	0	0
Sex Offenses (Forcible)	3	0.4	2	0.2	3	0.5
Robbery	0	0	0	0	0	0
Assaultive Offenses	23	3.3	25	2.9	21	3.5
Arson	0	0	0	0	0	0
Extortion/Blackmail	1	0.1	0	0	0	0
Burglary	4	0.6	0	0	1	0.2
Larceny/Theft Offenses	22	3.2	18	2.1	20	3.3
Motor Vehicle Theft	0	0	0	0	1	0.2
Counterfeiting/Forgery	0	0	0	0	0	0
Fraud Offenses	2	0.3	1	0.1	2	0.3
Embezzlement	0	0	0	0	0	0
Stolen Property Offenses	0	0	0	0	0	0
Destruction/Damage/Vandalism	3	0.4	7	0.8	4	0.7
Drug/Narcotic Violations	19	2.8	25	2.9	8	1.3
Pornography/Obscene Material	0	0	0	0	0	0
Gambling Offenses	0	0	0	0	0	0
Weapon Law Violations	2	0.3	1	0.1	1	0.2

UT Health Science Center

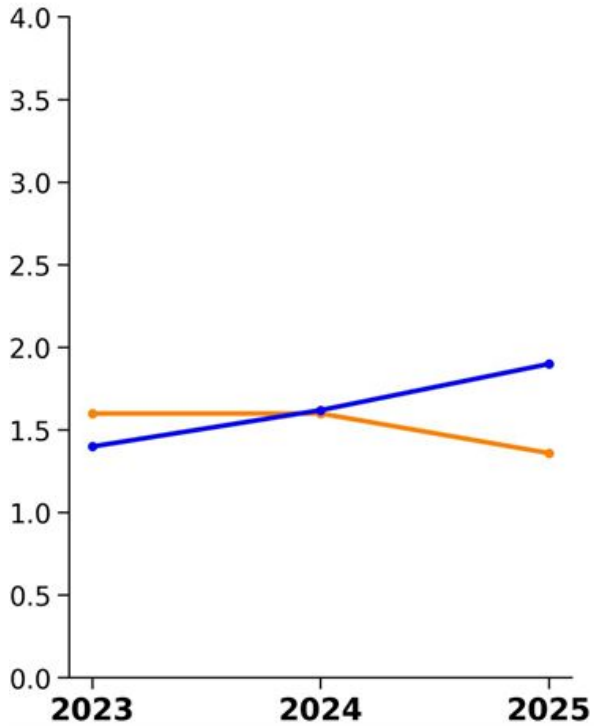
	2025	Rate Per 1000	2024	Rate Per 1000	2023	Rate Per 1000
Homicide Offenses	0	0	0	0	0	0
Kidnapping/Abduction	0	0	0	0	0	0
Sex Offenses (Forcible)	0	0	0	0	0	0
Robbery	0	0	0	0	0	0
Assaultive Offenses	8	0.9	14	1.8	13	1.7
Arson	0	0	1	0.1	0	0
Extortion/Blackmail	0	0	0	0	0	0
Burglary	0	0	2	0.3	0	0
Larceny/Theft Offenses	11	1.3	17	2.1	19	2.5
Motor Vehicle Theft	1	0.1	0	0	14	1.8
Counterfeiting/Forgery	0	0	0	0	0	0
Fraud Offenses	1	0.1	0	0	0	0
Embezzlement	0	0	0	0	0	0
Stolen Property Offenses	0	0	0	0	0	0
Destruction/Damage/Vandalism	10	1.2	10	1.3	19	2.5
Drug/Narcotic Violations	5	0.6	1	0.1	10	1.3
Pornography/Obscene Material	0	0	0	0	0	0
Gambling Offenses	0	0	0	0	0	0
Weapon Law Violations	1	0.1	0	0	2	0.3

UT System & LGIs

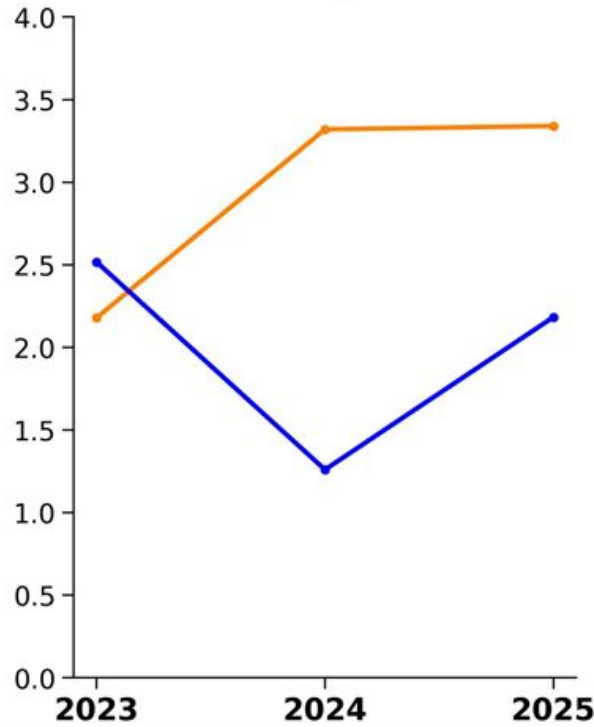
	UT	LGIs
	Rate Per 1000	Rate Per 1000
Homicide Offenses	0.0	0.0
Kidnapping/Abduction	0.0	0.0
Sex Offenses (Forcible)	0.1	0.2
Robbery	0.0	0.0
Assaultive Offenses	1.6	1.6
Arson	0.0	0.0
Extortion/Blackmail	0.1	0.1
Burglary	0.1	0.3
Larceny/Theft Offenses	2.7	2.7
Motor Vehicle Theft	0.2	0.3
Counterfeiting/Forgery	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

3-Year Crime Rates (UT vs LGI: Assault, Drugs, Weapons)

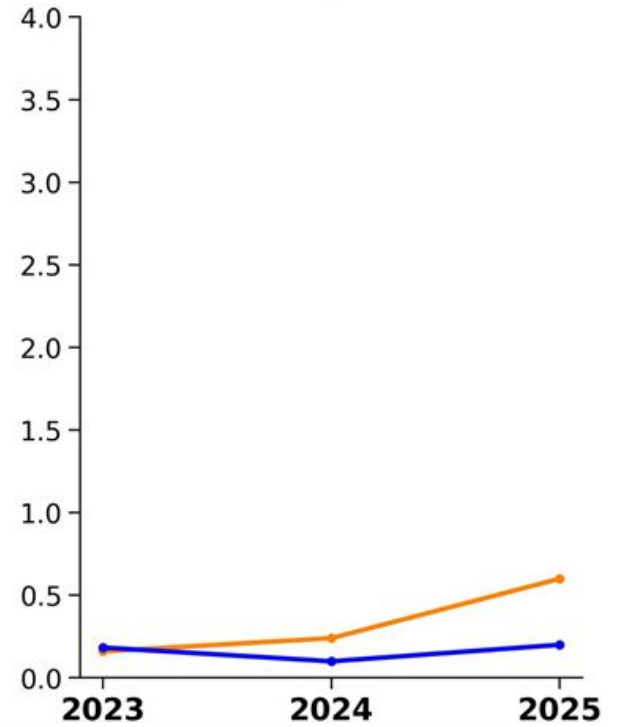
Assault



Drugs



Weapons



Crime Rate per 1,000 People

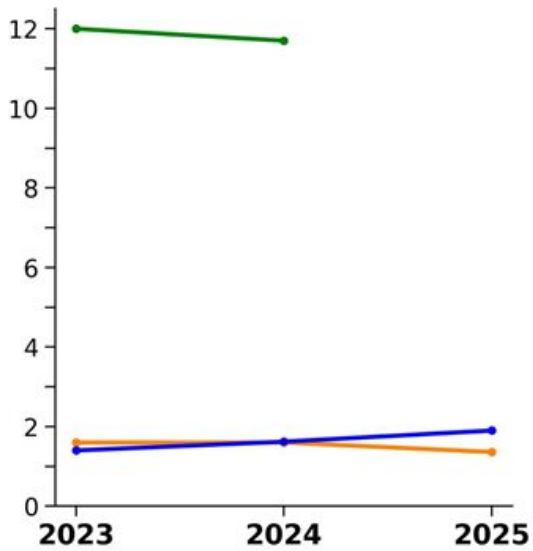
Source: TBI Data



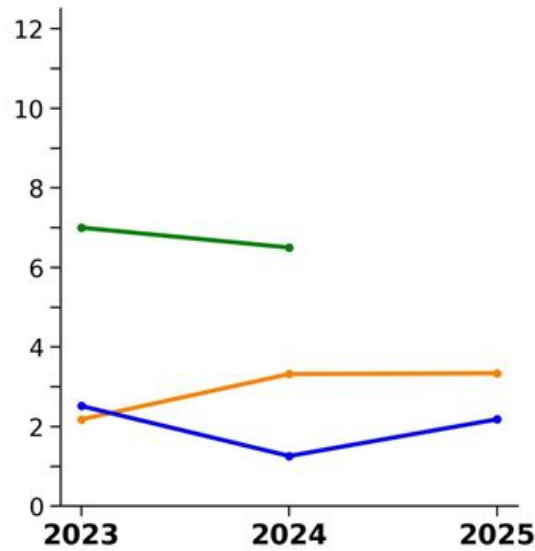
3-Year Crime Rates (UT vs LGI vs Tenn)



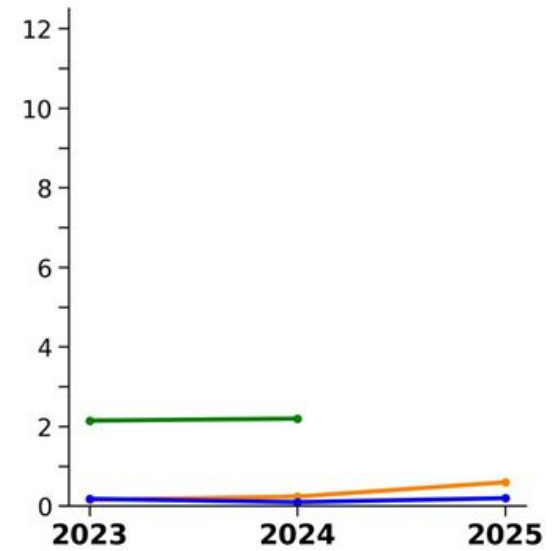
Assault



Drugs



Weapons



Crime Rate per 1,000 People

Source: TBI Data & US Census Data



THANK YOU



THE UNIVERSITY OF TENNESSEE BOARD OF TRUSTEES

AGENDA ITEM SUMMARY

Meeting Date: June 29, 2026

Committee: Audit and Compliance

Item: **UTS 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. This is the fifth and final campus for which the committee will hear directly from the campus about safety and security efforts on the campus. The goal of this discussion is to provide an update along with the associated context and an overview of the current landscape at UT Southern.



Annual Meeting of the University of Tennessee System
Board of Trustees

June 29 – 30, 2026

CAMPUS SAFETY AND SECURITY

UPDATE ON INFRASTRUCTURE AND STRATEGY

PRESENTED BY:

Kelly Mihalik, Special Projects Investigator & Public Safety Manager, UT System

Melinda S. Arnold, Ph.D., Chancellor, University of Tennessee Southern



SAFETY GRANT INVESTMENTS

FUNDS ALLOCATED TO STRENGTHEN CAMPUS SAFETY AND SECURITY



 | **\$4,191,974**
TOTAL AWARDED

 | These investments strengthen campus safety and security and support a safer environment for our students, faculty, and staff. 

STRATEGIC INFRASTRUCTURE INVESTMENTS



ACCESS CONTROL

Expand camera coverage and electronic access infrastructure



LIGHTING

Enhance lighting across roads and pedestrian areas



PERIMETER SECURITY

Convert perimeter locks to electronic access controls

LEVERAGING TECHNOLOGY AND EMERGENCY READINESS



EMERGENCY ALERTS

Enhanced partnership
expands emergency
alert capabilities



RADIO COORDINATION

Radios improve coordination
with local law enforcement
and first responders



AED / ONE BOX

AED/One Box expansion
strengthens emergency
response resources

STRENGTHENING SECURITY OPERATIONS



24/7 CAMPUS SECURITY

Moving toward 24/7 campus security coverage



SECURITY STAFFING

Adding full-time overnight security and Assistant Director roles



EVENT & OPERATIONS SUPPORT

Expanding part-time and student worker support for events and operations

PREPARING THE CAMPUS FOR FALL 2026



THREAT RESOLUTION

Modern threat resolution supports additional focused campus safety



PARKING STRATEGY

New parking strategy addresses construction and access changes



CONTINUED UPDATES

Ongoing updates to cameras, radios, uniforms, equipment, and protocols



THANK YOU

BUILDING COMMUNITIES. EXPANDING OPPORTUNITIES. CHANGING LIVES.





THE UNIVERSITY OF TENNESSEE BOARD OF TRUSTEES

AGENDA ITEM SUMMARY

Meeting Date: June 29, 2026

Committee: Audit and Compliance

Item: **Internal Audit and AI Update**

Type: Discussion

Presenter(s): Brian Daniels, Chief Audit & Compliance Officer

Background Information

AI remains in the national discussion around the current and future state of Higher Education. Internal Audit is in a somewhat unique role as it relates to AI in that it is charged with assessing governance models and the associated risks associated with AI proliferation in Higher Education. The goal of this discussion is to provide an update on the relative maturity of AI at the University of Tennessee, as well as how Internal Audit is engaging on this front.



AI@UT

Institutional risk and
strategic opportunity



How AI changes institutional risk

AI is increasing the speed and scale of cyber attacks

Higher education is especially exposed because systems, users, and vendors are broadly distributed

Fraudulent email, voice, and video are becoming more convincing

A vendor breach can quickly affect multiple campuses and systems

Strong governance and oversight are needed as AI adoption grows



Vendor compromise can become a campus-wide security event in hours

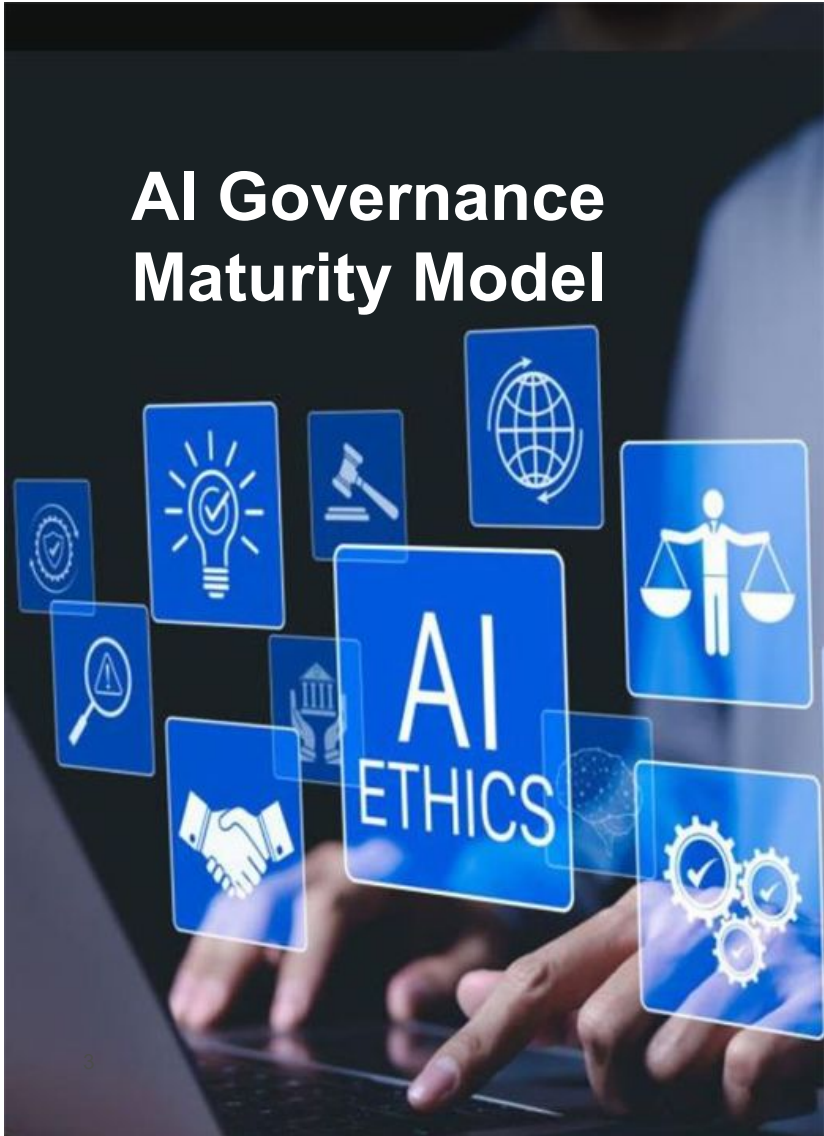
Threat actor targets **the software vendor's environment**, not the campus directly

Potential exposure of **private or confidential data**

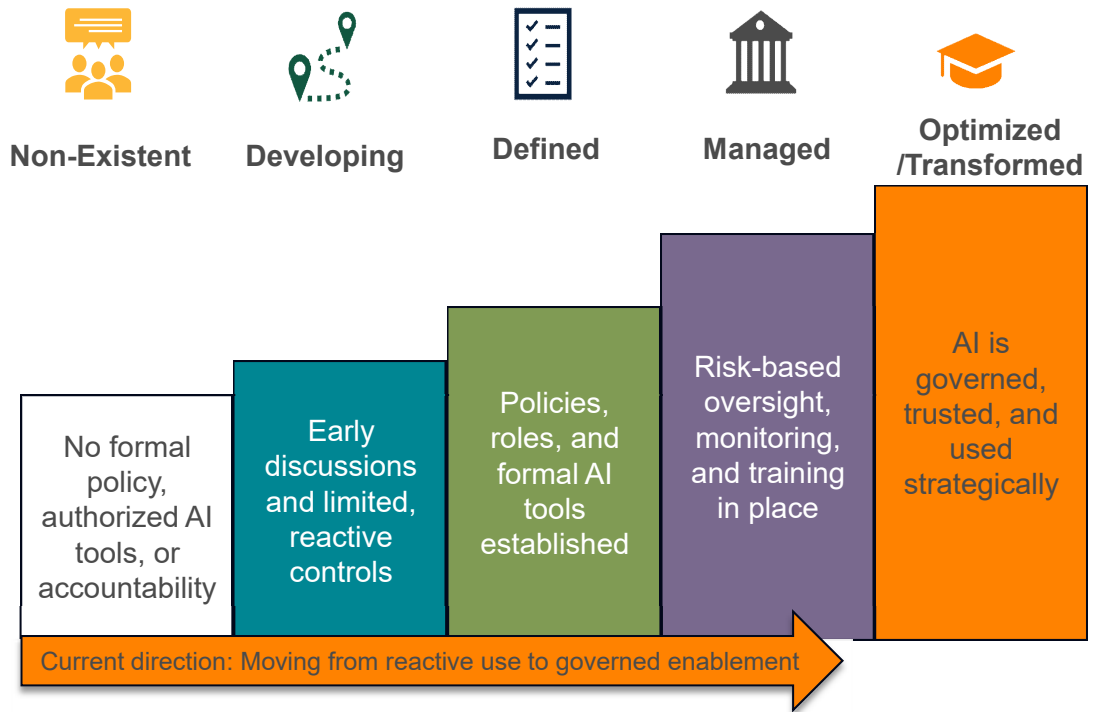
Impacts cascade across **many institutions** simultaneously

Forces rapid actions: **credential resets, access reviews, vendor assurance**

Large, complex research institution environment + distributed campuses + dependence on outside cloud-based systems = number of places the institution is exposed

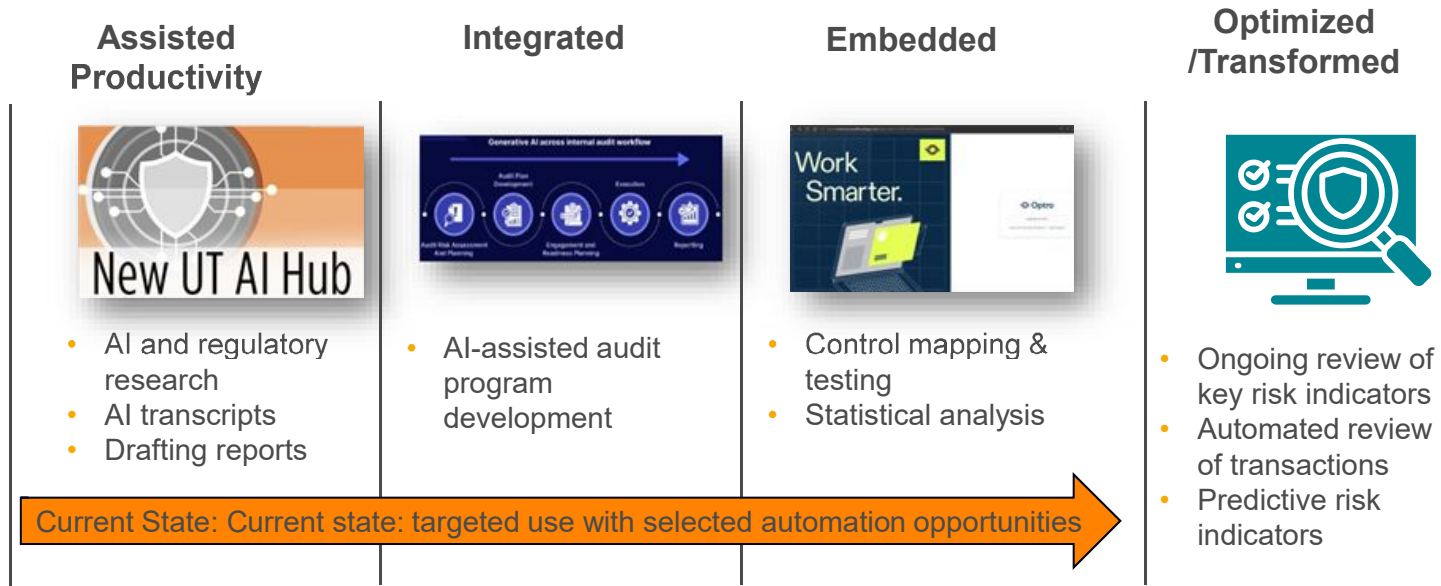


Adopt AI responsibly, transparently, and at scale



How AI can strengthen Internal Audit

- Improve audit efficiency and expand risk coverage
- Identify patterns, anomalies, and emerging issues faster
- Human judgment remains essential for oversight and assurance
- Adoption should be phased, controlled, and aligned to policy
- Near-term use should focus on practical, low-risk opportunities



Athletics Compliance Reports - Summary



THE UNIVERSITY OF
TENNESSEE
SYSTEM

Annual Campus Reports on Athletics Compliance Function

- The **compliance reporting structure** in each campus athletics department **is appropriate and follows best practices**, including having a direct line between the director of compliance and the **faculty athletics representative**.
- The **process for reporting and investigating** alleged NCAA rules violations at each campus athletics department **is consistent with NCAA rules and best practices**.

Annual Campus Reports on Athletics Compliance Function

- The number of **full-time athletics compliance employees** at **UTC**, **UTK**, and **UTM** is consistent with peers in their respective conferences. **UTK's** compliance function is comprised of employees doing traditional compliance work and employees doing NIL-related compliance activities.

Annual Campus Reports on Athletics Compliance Function

- **Each campus** reported some **Level III NCAA rules infractions** since the last annual report. UTC and UTM each had 1 Level III infraction, and UTK had 12 Level III infractions. All the infractions for each campus were self-reported, and none led to major penalties from the NCAA.
 - “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)

QUESTIONS?



THE UNIVERSITY OF TENNESSEE BOARD OF TRUSTEES

AGENDA ITEM SUMMARY

Meeting Date: June 29, 2026

Committee: Audit and Compliance

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

Type: Information

Presenter: Ryan Stinnett, General Counsel

Background Information

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 annual report written 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.

UT Southern is a member of the National Association of Intercollegiate Athletics (NAIA), rather than the NCAA, and therefore is not subject to BT0015. To provide additional context for the Committee, UT Southern has submitted information addressing: (1) key similarities and distinctions between the NAIA and the NCAA; (2) the student-athlete experience at UT Southern; and (3) the organizational structure of UT Southern’s athletics program, including its athletics compliance function. This information follows the reports from the NCAA-member campuses.

5



Office of the Chancellor
615 McCallie Ave., Dept. 5605
Chattanooga, TN 37403
Phone 423-425-4141
Fax 423-756-5559
utc.edu/chancellor

5

TO: C. Ryan Stinnett, General Counsel

FROM: University of Tennessee Chattanooga *Scott Bruce*

RE: Annual Report to the UT Audit and Compliance Committee

DATE: June 2, 2026

The University of Tennessee at Chattanooga (UTC) 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 (SOCON) 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 2025-26, UTC found one minor (secondary/level III) violation, which was isolated and did not lead to any major penalties from the NCAA.

A summary of the violation includes:

1. Administrative

Violation of NCAA Bylaw 13.1.1.4.1.1.1-(b) (Notification of Transfer – Athletics Aid Reduction, Cancellation or Nonrenewal)

A student-athlete may initiate notification of transfer during a 30 consecutive-day period beginning the day after the student-athlete received or was issued athletically related financial aid after the academic year of initial, full-time enrollment at the certifying institution and such aid is reduced, canceled or renewed after the period of award.

A wrestling student-athlete was advised by a licensed mental health specialist to engage in ongoing treatment with a community-based provider. Because of the

severity of the mental health concerns and the need for sustained outpatient psychotherapy, the student-athlete was required to take a full medical withdrawal from UTC. As a result of the withdrawal the student-athlete's aid was cancelled.

After being released from treatment, the student-athlete requested to be entered into the transfer portal and was entered under bylaw 13.1.1.4.1.1.1-(b) in December 2025. It was later discovered by the SOCON conference office that the student-athlete did not fully satisfy the requirements of the rule to enter the transfer portal and was removed immediately by UTC.

Due to the ongoing misinterpretation of bylaw 13.1.1.4.1.1.1-(b), the NCAA Division I Governance and Member Services office issued guidance on May 5, 2026, to all institutions clarifying its application and requesting that institutions that entered student-athletes into the transfer portal in a manner inconsistent with the intended application of the rule are considered to have done so in error and should remove those student-athletes from the transfer portal immediately.

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



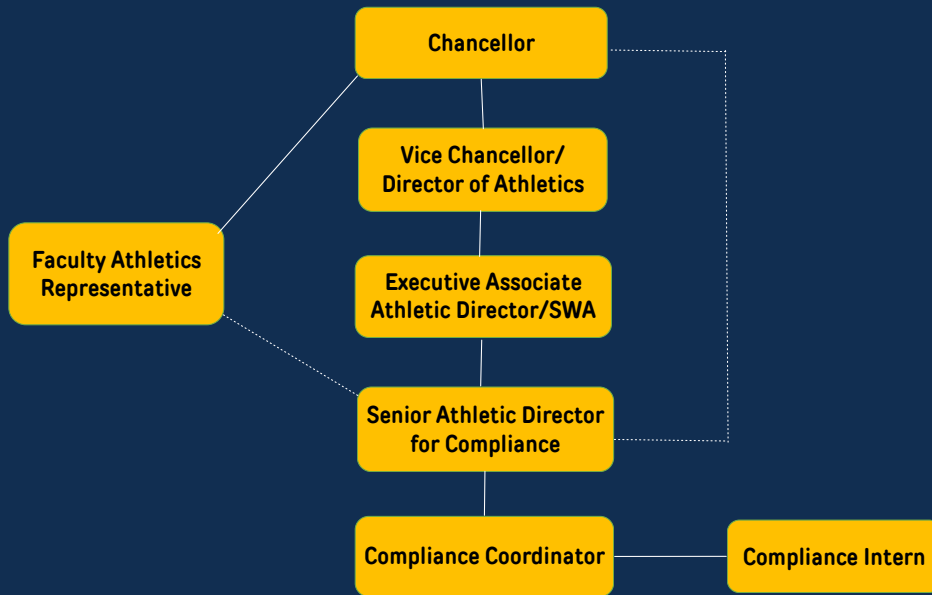
UNIVERSITY OF TENNESSEE CHATTANOOGA

COMPLIANCE ANNUAL REPORT

DEPARTMENT OF ATHLETICS

2026





**COMPLIANCE
ORGANIZATIONAL
CHART**

Full Time Staff Comparison

Institution	Full Time Staff
Mercer	2
Western Carolina	1
Wofford	1
North Carolina at Greensboro	1
Furman	2
Virginia Military Institute	1
Citadel	1
Samford	2
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

5

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

5

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

5

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

5

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

5

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

5

Step 6- Reporting Institutional Findings to NCAA:

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





VIOLATIONS



ADMINISTRATIVE

Violations : 1
Bylaw # 13.1.1.4.1.1.1 (b)
Level III



June 4, 2026

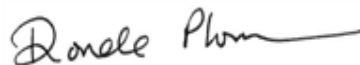
University of Tennessee Board of Trustees
Audit and Compliance Committee
c/o C. Ryan Stinnett, General Counsel
1169 UT Tower
505 Summer Place
Knoxville, TN 37902

Re: Annual Report to the Audit Compliance Committee (BT0015 – 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 Athletics Association (NCAA) and determine the adequacy of the university's athletics compliance function.

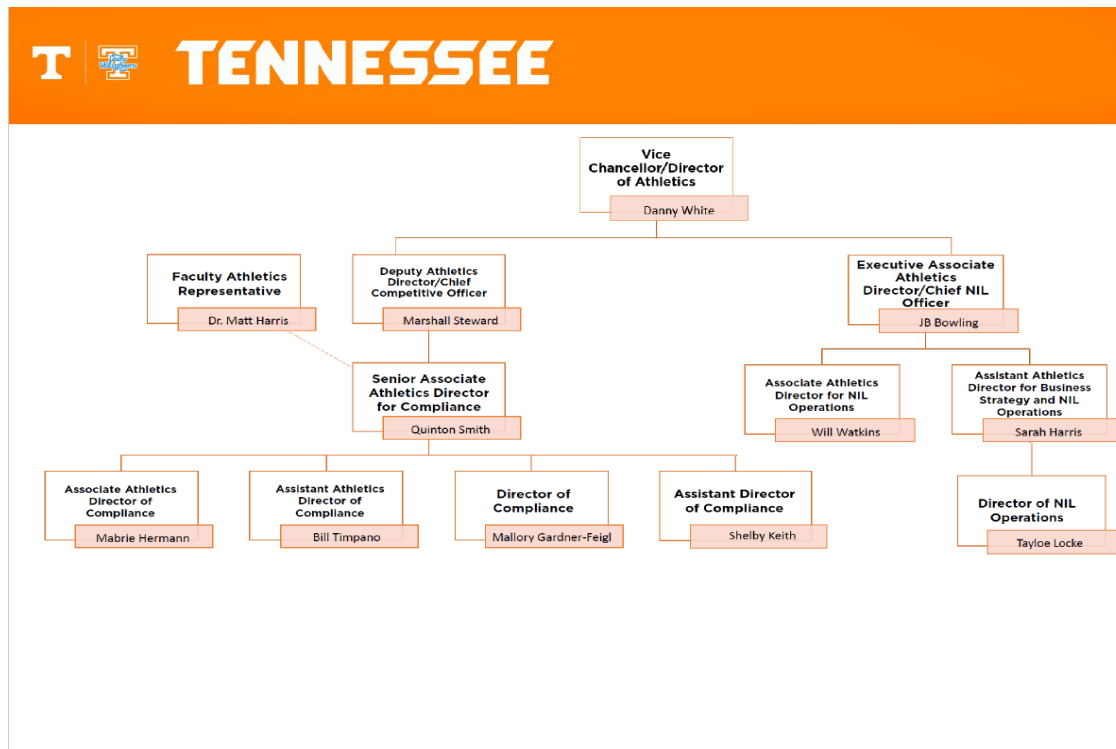
Sincerely,



Donde Plowman
Chancellor

Office of the Chancellor
800 Andy Holt Tower 1331 Circle Park Drive Knoxville, TN 37996-0180
865-974-3265 chancellor.utk.edu

ATHLETICS COMPLIANCE STRUCTURE



SEC PEER COMPARISON OF COMPLIANCE STAFFING

AS OF MAY 2026		
Rank	School	Full-Time Staff
1	Georgia	9
2	Texas A&M	8
T-3	Kentucky	7
T-3	Alabama	7
T-3	South Carolina	7
T-6	Missouri	6
T-6	Oklahoma	6
T-6	Texas	6
T-6	Auburn	6
T-10	Tennessee	5 (9)
T-10	Florida	5
T-10	Ole Miss	5
T-10	LSU	5
T-14	Arkansas	4
T-14	Mississippi State	4
T-14	Vanderbilt	4

With UT Athletics’ recent restructuring and the formation of the NIL Operations unit, it is important to note that this change does not reflect a reduction in overall compliance capacity. Although the revised organizational structure may give the impression of a reduced compliance staff, UT’s overall compliance related capacity and coverage remain comparable to our peers.

The NIL Operations unit is led by a former member of the compliance staff and includes another former compliance staff member. While the unit is not formally in the compliance office, it is aligned under a broader compliance umbrella. This four-person team is responsible for several key regulatory functions such as financial aid, roster management, NIL, and revenue sharing that are often housed directly within traditional compliance offices at peer institutions.



RULES EDUCATION PROGRAM

UT athletics rules education and training program is robust and comprehensive and in-line with industry standards. Our program includes frequent and consistent in-person meetings followed with contemporaneous documentation. The educational programming and content is proactive, in-depth, topical and wide-ranging, and should equip staff with necessary information to carry out their job functions in a compliant manner.



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-III) 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 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 2025-26

PER SPORT	
Administration	3
Baseball	1
Men's Basketball	2
Women's Basketball	1
Track and Field/Cross Country	2
Football	1
Men's Golf	0
Women's Golf	0
Rowing	1
Soccer	0
Softball	0
Swimming & Diving	1
Men's Tennis	0
Women's Tennis	0
Volleyball	0
Total	12

PER BYLAW	
Bylaw 5	0
Bylaw 10	2
Bylaw 11	1
Bylaw 12	1
Bylaw 13	7
Bylaw 14	0
Bylaw 15	0
Bylaw 16	1
Bylaw 17	1
Bylaw 18	0
Bylaw 20	0
Bylaw 31	0
	12



LEVEL III VIOLATIONS 2025-26

Bylaw	Case Type	Bylaw	Case Type
10.3 - Sports Wagering Activities.;	Sports Wagering	13.2.1 - General Regulation.; 13.2.1.1 - Specific Prohibitions	Off-Campus Contacts, Recruiting
11.1.1.1 - Responsibility of Head Coach.; 13.1.1.4 - Four-Year College Prospective Student-Athletes.	Other, Recruiting	13.4.1 - Recruiting Materials and Electronic Correspondence -- General Rule.	Recruiting, Recruiting Materials
11.7.5.2 - Number of Coaches Recruiting Off-Campus at the Same Time -- Women's Basketball.	Athletics Personnel, Other	13.6.3 - Requirements for Official Visit.	Official Visits, Recruiting
12.3.2 - Professional Sports Agent.; 12.3.2.4 - Benefits from Prospective Agents.	Amateurism, Use of Agents	16.2.2.2 - Payment to Third Party..	Awards and Benefits
13.1.1.4 - Four-Year College Prospective Student-Athletes.	Recruiting, Telephone Calls	17.1.7.3.2.1 - Countable Athletically Related Activities Prohibited After Competition.	Athletically Related Activities, Playing Seasons





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

May 18, 2026

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:

Please accept this written statement outlining UT Martin’s commitment to athletics compliance from a larger campus perspective and providing an overview of the information contained in UT Martin’s annual report.

UT Martin’s commitment to institutional and athletics compliance is integrated into the day-to-day operations of the department of intercollegiate athletics. Efforts are largely based in education and monitoring of all campus constituents, including coaches, athletes, and administrators alike. Education includes all NCAA, OVC, federal, state, and institutional regulations that impact the operations of the athletics department.

I am pleased to report to the committee that an additional full-time compliance administrator has been added to the athletics staff at UT Martin. This has been a very timely addition, as the ever-changing landscape of college athletics certainly warrants additional personnel. The department also implemented new compliance software to assist with monitoring, education, communication, and management efforts. There has been a concerted effort towards strengthening compliance at UT Martin since the previous summer’s report.

The institution concluded its probationary period May 1, 2026, that resulted from a series of Level II violations, including failure to monitor. The steps outlined above reflect the department’s proactive commitment to improvement in this area.

University of Tennessee Board of Trustees
Audit and Compliance Committee
c/o Ryan Stinnett, General Counsel
May 18, 2026
Page 2

The Chancellor's oversight and support of the compliance office's efforts help stress the importance to the rest of 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 encourage efforts to ensure campus compliance.

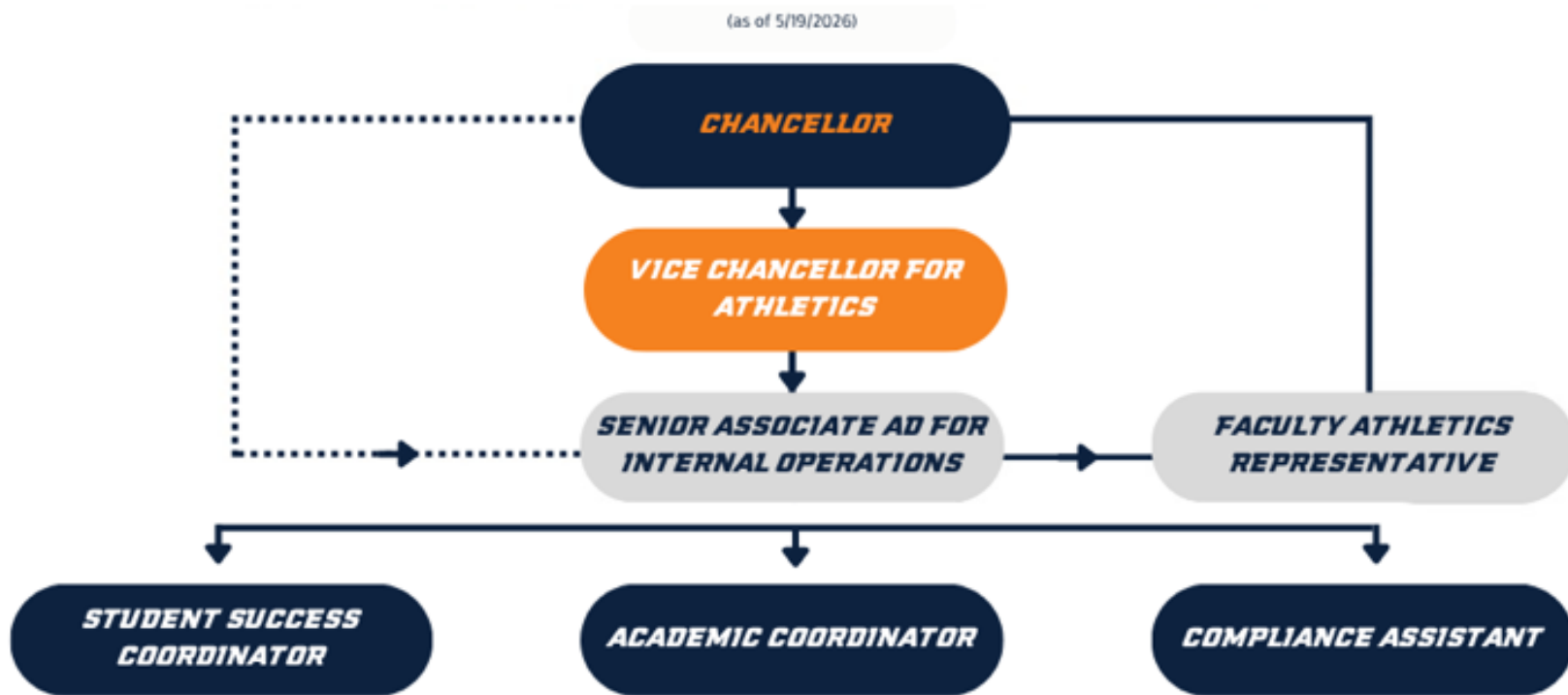
Sincerely,



Dr. Nancy E. Freeman, Sr.
Chancellor



COMPLIANCE STAFF ORGANIZATIONAL CHART





UT MARTIN SKYHAWKS
DEPARTMENT OF INTERCOLLEGIATE ATHLETICS

Violation

Bylaw	Sport	Case Type	Date
13.1.1.4	Football	Recruiting; Four-Year College PSA	June 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	2
Western Illinois University	2



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).



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.

Understanding the Landscape.

NAIA vs. NCAA







**KEY DIFFERENCES, SIMILARITIES,
AND STUDENT-ATHLETE EXPERIENCE**

NATIONAL ASSOCIATION OF
INTERCOLLEGIATE ATHLETICS





NAIA AND NCAA: KEY DIFFERENCES

AREA	CURRENT NAIA MODEL	NCAA MODEL
 GOVERNANCE	Single association	Division-based structure (D1, D2, D3)
 RECRUITING	Flexible recruiting environment	More regulated recruiting environment
 SCHOLARSHIPS	Flexible equivalency model	Division-specific scholarship rules (D1 & D2 offer; D3 does not)
 COMPLIANCE	Smaller compliance footprint	Increased compliance requirements
 OPERATING COSTS	Lower administrative burden	Higher administrative and reporting expectations
 COMPETITIVE POSITIONING	Regional NAIA peers	Access to NCAA membership and competition opportunities



KEY SIMILARITIES



Academic eligibility requirements



National championship opportunities



Leadership and character development



Athletic scholarship opportunities



Competitive collegiate athletics



Focus on student-athlete success



STUDENT-ATHLETE EXPERIENCE



FLEXIBILITY

NAIA offers more flexibility in scheduling and participation opportunities.



RELATIONSHIPS

Smaller team environments foster closer relationships with coaches and teammates.



DEVELOPMENT

Both provide opportunities for personal growth, leadership and skill development.



ACADEMICS

Strong emphasis on academic success and preparing for life after athletics.

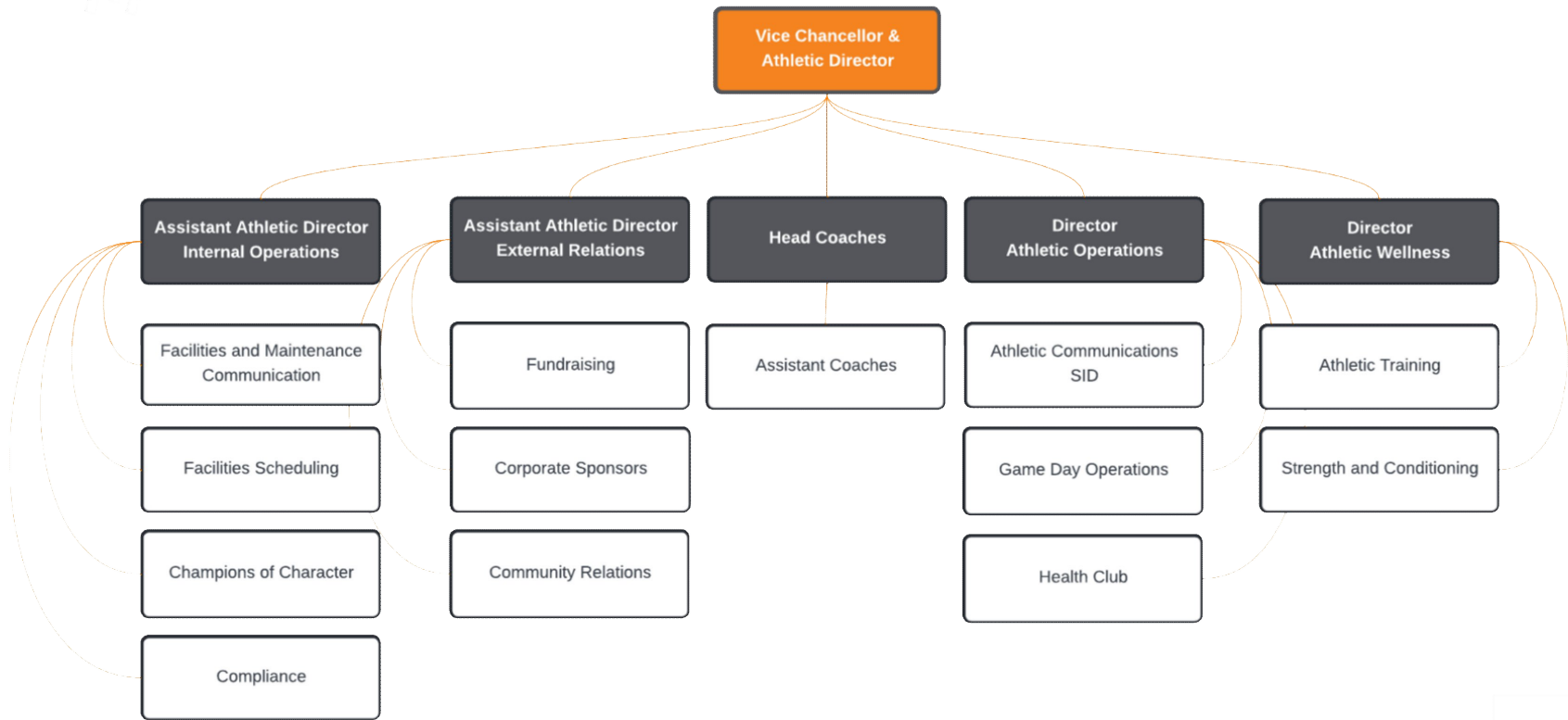


CAREER PATHS

Both paths can lead to successful careers in sports or other fields.

NATIONAL ASSOCIATION OF
INTERCOLLEGIATE ATHLETICS







THE UNIVERSITY OF TENNESSEE BOARD OF TRUSTEES

AGENDA ITEM SUMMARY

Meeting Date: June 29, 2026

Committee: Audit and Compliance

Item: **Proposed Settlement of Litigation:** *Pharma Conference Education, Inc. v. State of Tennessee, Tennessee Claims Commission, Claim No. K20171856*

Type: Action

Presenter: Ryan Stinnett, General Counsel

Background Information

On July 1, 2016, Pharma Conference Education, Inc. (“Pharma”) and the University entered into a written agreement by which Pharma agreed to produce pharmaceutical-related conferences. The term of the agreement was five years, with an automatic renewal for another five years unless either party provided a one-year notice of termination. Soon after the document was signed by Pharma and the University, a disagreement arose between the parties about the scope of each party’s responsibilities, and the University terminated the agreement on January 18, 2017.

Pharma filed a claim against the University on May 25, 2017, alleging that by terminating the agreement, the University had breached the contract. Pharma asserted damages of approximately \$2.4 million. After years of litigation, the parties reached a tentative settlement agreement in the amount of \$700,000 following mediation in December 2025.

Board Policy BT0031 – Policy on Settlement of Claims and Litigation establishes specific requirements for approval and oversight of the settlement of claims and litigation against the University. All settlements for more than \$250,000 must be approved by the applicable campus Chancellor, the Chief Financial Officer, the President, and either the Executive Committee or the Audit and Compliance Committee of the Board of Trustees, as determined by the Chair of the Board.

The proposed settlement has been approved by UTHSC Chancellor Peter Buckley, Senior Vice President & CFO David Miller, and President Randy Boyd. Additionally, I have approved the settlement agreement as to form and legality. If approved by the Board of Trustees, the settlement will also require approval by State officials, including the Attorney General and Governor.



THE UNIVERSITY OF TENNESSEE BOARD OF TRUSTEES

Committee Action

The Committee Chair will call for a motion to recommend adoption of the following Resolution.

Resolved:

The Audit and Compliance Committee of the Board of Trustees, acting pursuant to authority granted by Board of Trustees Policy BT0031 (Policy on Settlement of Claims and Litigation), hereby approves the recommended resolution of the litigation with Pharma Conference Education, Inc. in the amount of \$700,000, subject to the execution of a written and executed settlement agreement and mutual release between the University and Pharma (the "Settlement Agreement") as approved by the General Counsel and state approving authorities. Further, the proper University officers are hereby authorized to execute the Settlement Agreement and any ancillary documents as may be necessary and consistent with the terms hereof.



THE UNIVERSITY OF TENNESSEE BOARD OF TRUSTEES

AGENDA ITEM SUMMARY

Meeting Date: June 29, 2026
 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.

List of Information Items

- A. Research Security – Implementation Report
- B. Internal Audit - Quality Assessment Review - Self-Assessment
- C. 2026 System Title IX Report
- D. 2026 Audit Plan Update
- E. Outstanding Audit Issues
- F. Institutional Compliance Update
- G. Travel Exception Report



THE UNIVERSITY OF TENNESSEE SYSTEM

AUDIT AND COMPLIANCE

To: Board of Trustees, University of Tennessee

From: Sarah Pruett and Kari Babski-Reeves

Date: May 29, 2026

Subject: Research Security Report

7.1

The Research Security Council (RSC) has utilized the last year to review and refine the research security strategy for the University. Research security intersects with nearly every facet of the university, those that are engaged in the research enterprise and those that typically are not engaged in the research enterprise.

The UT system contracted with Fischer and Associates to perform a full research security program review. The review was structured to provide an analysis of current program maturity and to provide guidance on areas for refinement and/or enhancement. This evaluation touched on areas of current compliance obligations along with related processes and controls, depth of institutional knowledge, and risk for the UT System as a whole, the Knoxville Campus, and the Health Sciences Center. The results of this engagement recommended targeted policy development, enhancing training and resources for researchers and administration, and addressed governance and reporting requirements based on the University's one legal entity status.

This guidance informs the RSCs continued work which focuses on policy creation and revision. Three policies, Visiting Scholars, International Engagement, and International Travel, are poised to exit Council review and move toward adoption as defined in GE0001-University Policy & Related Procedure Development with additional policies to follow. The UT system has opted to extend engagement with Fischer and Associates to support a second phase of programmatic development focusing on training, website development, and support of campus research security efforts. To date, the Knoxville, Chattanooga, and Health Sciences Center campuses have also retained the services of Fischer and Associates to support maturing local programs.

Additionally, the UT System Office, UT Knoxville and UT Health Sciences Center are in various stages of searching for Chief Research Security Officer positions.

Thank you for your ongoing support for these efforts.

Sincerely,

Sarah T. Pruett, PhD

Sarah T. Pruett, PhD
Executive Director of Institutional Compliance

Kari Babski-Reeves, PhD
Associate Vice President for Research

Audit and Compliance

Internal Quality Assessment Review



AUDIT AND COMPLIANCE

MEMORANDUM

MAY 8, 2026



May 8, 2026

To:

Brian Daniels
Chief Audit and Compliance Officer

From:

James Hodge
Interim Executive Director of Internal Audit

7.2

EXECUTIVE SUMMARY

We have completed the internal quality assessment of Audit and Compliance (A&C) as required by the Institute of Internal Auditors (IIA) Global Internal Audit Standards (Standards). The objectives of the review were to assess conformance with the Standards, achievement of performance objectives, and opportunities to improve its overall management and work processes.

The Standards include in part that the chief audit executive must develop, implement, and maintain, a quality assurance and improvement program that covers all aspects of the internal audit function. This program includes two types of assessments:

- External assessments
- Internal assessments

Overall, A&C fully conforms to the Global Internal Audit Standards. The Standards suggest a scale of four ratings: full conformance, general conformance, partial conformance, and nonconformance. In addition, A&C effectively carries out its performance objectives. The review identified opportunities for improvement in the areas of planning and conducting engagements.

METHODOLOGY

The Global Internal Audit Standards guide the professional practice of internal auditing. These Standards require an external quality assessment (QA) at least once every five years by a qualified, independent assessor or assessment team. The purpose of the QA is to enhance the overall value of internal audit through evaluating conformance to the Standards and the Code of Ethics, ensuring appropriate charters are in place, and assessing the effectiveness and efficiency of the Internal Audit structure and processes.

The Institute of Internal Auditors *Quality Assessment Manual* and workbook were used to guide the internal self-assessment. This manual and associated workbooks are based on the Standards, which became effective January 9, 2025, and are considered a standard approach for conducting internal and external assessments.

The assessment is broken down into five domains of the Standards:

- I - Purpose of Internal Auditing
- II - Ethics and Professionalism
- III - Governing the Internal Audit Function
- IV – Managing the Internal Audit Function
- V – Performing Internal Audit Services



7.2

Domain II-IV consists of 15 principles and underlying standards. Possible ratings for all domains are as follows:

Ratings	Descriptions
Full Conformance	The internal audit function is fully achieving all 15 principals and the Purpose of Internal Auditing
General Conformance	The internal audit function is not fully achieving at least one principal or aspect of Domain I, but is achieving purpose
Partial Conformance	The internal audit function in not fully achieving at least one principal or aspect of Domain I, and the impact is significant to rate partial
Nonconformance	The internal audit function is not fully achieving at least one principal, and the impact is significant to rate nonconformance

The assessment team reviewed audit and advisory projects completed for the 2025 audit plan. To complete this process the team reviewed but was not limited to the following:

- The department’s charter
- Audit Committee charter
- Annual Risk Assessment
- Annual Audit Plan
- Board Minutes
- Organizational Chart and Position Descriptions
- Reviewed 5 audit engagements for conformance with the Standards.

APPROACH AND RESULTS

Overall, the University of Tennessee System Audit & Compliance Division fully conforms with the Global Internal Audit Standards. The Internal Audit function is fully achieving all 15 principles and the Purpose of Internal Auditing. Internal Audit has developed and implemented effective methodology documents and tools to ensure the audit activity conforms to the Standards, including appropriate charters, a risk assessment program, standardized forms and templates, applied audit methodology, and a quality assessment and improvement program.

The defined risk assessment program ensures a risk-based audit plan that is consistent with the organization’s goals and focuses resources on value-added projects. A review of the selected projects confirmed that audit projects are executed according to the methodology, resulting in accurate, supportable opinions, including actionable recommendations.

As part of the self-assessment, Internal Audit leveraged the IIA’s Quality Assessment Manual Template and identified both successful practices that are in place and areas where process improvement is warranted. This activity supports Internal Audit’s commitment to continuous improvement by ensuring adequate and ongoing management oversight of the internal audit activity.



OPPORTUNITIES FOR IMPROVEMENT

As stated above, we assessed our compliance as fully conforms; as such, our comments and recommendations are intended to build on our existing foundation.

PERFORMING INTERNAL AUDIT SERVICES

PRINCIPLE 13 PLAN ENGAGEMENTS EFFECTIVELY - STANDARD 13.5 ENGAGEMENT RESOURCES

The review of the selected projects identified an instance where the in-charge auditor did include total project hours required but did not discuss factors considered or staff allocation. Additionally, the engagement effort exceeded the planned milestones with no explanation in the audit file.

Based on a detailed review of the engagement file, it was determined additional effort was encountered and impacted projected engagement milestones. The engagement team focused on completing the remaining fieldwork in conformance with the Standards and the in-charge auditor received feedback on appropriate management of engagement resources including additional resource needs.

PRINCIPLE 14 CONDUCT ENGAGEMENT WORK – STANDARD 14.6 ENGAGEMENT DOCUMENTATION

The review of the selected projects identified opportunities to improve documentation of the considerations around the sufficiency of evidence items, evaluation of findings, and discussions with management.

Based on a detailed review of the above items and the overall engagement file, it was determined that a lack of documentation of key considerations was identified and addressed through workpaper reviews, auditor feedback, and did not impact the overall results of the related audit projects.

FORMALIZATION OF AUDIT AND COMPLIANCE POLICIES AND PROCEDURES

The review found that the A&C's *Audit and Compliance Manual* has not been updated to formalize several current practices and procedures including those outlined by the new Standards.

A&C should consider updating and formalizing current departmental policies, procedures and practices into its Internal Audit Manual. The purpose of the Internal Audit Manual is to establish a clear, consistent framework for the planning, execution, reporting, and follow-up of internal audit activities. The manual should be intended to promote risk-based auditing practices that align with the institution's mission, objectives, and goals.

The manual should provide guidance on audit standards, methodologies, roles, and responsibilities, ensuring that audit work is conducted with independence, objectivity, and professionalism. Additionally, a manual serves as a reference for A&C staff and management.

SUMMARY

For each of the improvement opportunities above, it should be noted that the engagement file structure and supporting templates support a workflow to ensure conformance with the Standards. Ratings below Fully Conforms resulted from insufficient evidence or support for specific process steps; however, overall results indicate engagements were executed in conformance with the Standards.

To address the improvement opportunities, A&C will conduct internal training sessions to convey the QA results and focus on areas rated below Fully Conforms. A&C will also begin updating its manual. Training and manual updates will be completed by the end of 2026.

c:
Randy Boyd
David Miller
Audit & Compliance Committee

7.2



Appendix I
Detailed Conformance with IIA Standards

Domain	Description	Principles	Conformance Rating
I	Purpose of Internal Auditing	N/A	Fully Conforms
II	Ethics and Professionalism	1: Demonstrate Integrity	Fully Conforms
		2: Maintain Objectivity	Fully Conforms
		3: Demonstrate Competency	Fully Conforms
		4: Exercise Due Professional Care	Fully Conforms
		5: Maintain Confidentiality	Fully Conforms
III	Governing the Internal Audit Function	6: Authorized by the Board	Fully Conforms
		7: Positioned Independently	Fully Conforms
		8: Overseen by the Board	Fully Conforms
IV	Managing the Internal Audit Function	9: Plan Strategically	Fully Conforms
		10: Manage Resources	Fully Conforms
		11: Communicate Effectively	Fully Conforms
		12: Enhance Quality	Fully Conforms
V	Performing Internal Audit	13: Plan Engagements Effectively	Generally Conforms
		14: Conduct Engagement Work	Generally Conforms
		15: Communicate Engagement Results and Monitor Action Plans	Fully Conforms
Overall Rating			Fully Conforms

7.2

2026 REPORT



TITLE IX

7.3



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7.3

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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

Since establishing a systemwide Title IX Office in 2017, the University of Tennessee has continued to strengthen and sustain its commitment to fostering safe, respectful, and nondiscriminatory learning, living, and working environments across all UT campuses and institutes.

Over the past decade, the Office of Title IX has worked in close partnership with campus Title IX officials to develop and refine policy, evaluate program effectiveness, expand education and prevention initiatives, and support consistent implementation across the UT System. The office also continues to monitor legal and regulatory developments, identify emerging best practices, and coordinate annual reporting efforts.

7.3

The Office of Title IX publishes this annual report to provide a transparent overview of our collective work, increase awareness of prevention, education, and support initiatives, recognize the dedicated efforts of campus professionals and community partners, and reinforce accountability to the students, faculty, staff, and communities we serve.

7.3



As a statewide system, the University of Tennessee continues to benefit from collaboration among campuses and institutes in support of Title IX efforts. Through shared resources, regular engagement, and ongoing partnership among campus Title IX Coordinators and system leadership, we remain committed to promoting consistent practices and fostering safe and respectful learning, living, and working environments across the UT System.

Respectfully,

Ashley Blamey, Title IX Compliance Coordinator

INTRODUCTION

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.

7.3

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 has remained compliant with the 2020 regulations since implementation.

Our Model

7.3

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.

Supportive 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 strengthen and improve Title IX compliance activities across the UT System. The System Title IX Compliance Coordinator implements a collaborative and proactive approach to continuous improvement and supports the utilization of best practices throughout the system. Key 2025 system-focused projects and initiatives included:

- Drafted annual updates to the Policy on Sexual Harassment, Sexual Assault, Dating and Domestic Violence, and Stalking for all campuses and institutes, including Chancellor/President memoranda and administrative notifications to ensure consistent system-wide communication.
- Planned and hosted the annual system-wide Title IX training required by federal regulations in collaboration with Melissa Carleton, JD (Partner, Bricker Graydon) on August 5, 2025. The training included participation from Title IX coordinators, investigators, and adjudicators across the UT System, and all required training materials were posted to the system website in accordance with federal regulations.
- Developed and submitted the annually-required systemwide State Comptroller Title IX Plan.
- Developed and published the systemwide Annual Title IX Report.
- Facilitated annual mandatory Title IX training for UTSA through K@TE modules, achieving a 100% completion rate.
- Hosted regular meetings with system-wide Title IX Coordinators and the Office of General Counsel to support collaboration, consistency, and the sharing of best practices.
- Collaborated with the Executive Director of Institutional Compliance to develop a mission statement and restructure the UTK Institutional Compliance Committee to enhance institutional coordination and effectiveness.

7.3

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 CHATTANOOGA](#)

[UT HEALTH SCIENCE CENTER](#)

[UT KNOXVILLE](#)

[UT MARTIN](#)

[UT SOUTHERN](#)

Policies and Procedures

[University of Tennessee at Chattanooga](#)

[University of Tennessee Health Science Center](#)

[University of Tennessee Knoxville/Institute of Agriculture/Institute for Public Service/UT System](#)

[University of Tennessee at Martin](#)

[University of Tennessee Southern](#)

7.3

OUR WORK

Mandatory Reporter Training

Federal law requires UT System campuses to designate employees with the authority to respond to reports of sexual harassment and sexual violence. Under UT policy, these individuals are referred to as “Mandatory Reporters,” and nearly all campus employees who interact with students—excluding certain confidential employees defined by licensure and policy—serve in this role.

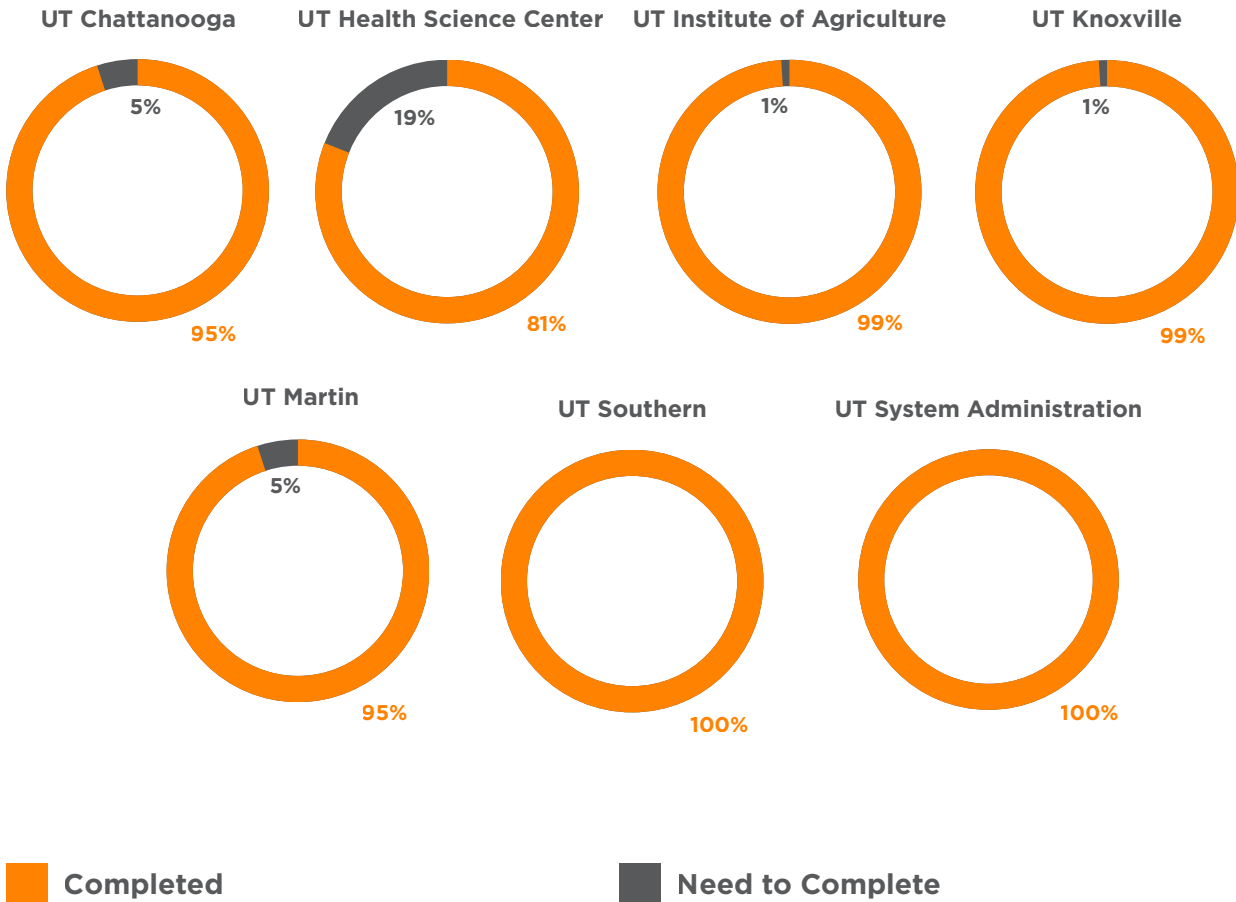
Mandatory Reporters are required to share reports or information regarding potential sexual harassment or sexual violence with the campus Title IX Coordinator for review. These referrals allow Title IX offices to provide timely outreach regarding supportive resources, safety measures, reporting options, and available university processes, while also helping institutions identify patterns, assess campus climate concerns, and respond consistently across the university.

Because Mandatory Reporters are often the first university employees to receive disclosures or concerns, institutionalized annual training remains a critical component of effective Title IX compliance efforts. Consistent training helps employees understand their responsibilities, recognize situations that may require reporting, respond appropriately to individuals seeking assistance, and support a coordinated institutional response grounded in consistency and compliance.

Effectively addressing sexual harassment in an educational environment requires a culture that treats concerns seriously and responds consistently. Institutionalized training helps build a shared understanding of the issue, increases awareness of employee reporting obligations, and reinforces the role employees play in connecting students, faculty, and staff with appropriate resources and support. When members of the campus community trust that concerns will be handled fairly and appropriately, institutions are better positioned to encourage reporting, deter misconduct, and maintain safe and respectful learning, living, and working environments.

7.3

Training completion rates across the UT System continue to demonstrate strong institutional engagement and year-over-year commitment to these efforts, reflecting the importance of consistent education and shared accountability in supporting effective Title IX compliance practices.



OUR 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 the 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.

7.3



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.



Omar Malik

*INTERIM DIRECTOR, OFFICE OF COMPLIANCE
INTERIM TITLE IX COORDINATOR
UNIVERSITY OF TENNESSEE HEALTH SCIENCE CENTER*

omalikt@uthsc.edu

Omar Malik, J.D., serves as the Interim Director of the Office of Compliance and Title IX Coordinator leading the Office of Compliance team at UT Health Science Center. Prior to his current role, Omar served as Senior Compliance Resolution Officer at UT Health Science Center, an Assistant District Attorney with approximately 10 years of service, and an attorney at law in private practice in Shelby County, Tennessee.

Omar is an alumnus of the University of Tennessee, at Knoxville, where he earned a B.S. in Political Science with a minor in Business Administration. He also earned his Juris Doctorate from the University of Memphis Cecil C. Humphreys School of Law. Outside his professional role, Omar is active in the community in Memphis and has served as a Leo Bearman Sr. American Inn of Court Barrister, a Youth Court Attorney volunteer at the Shelby County Juvenile Court and is a graduate of the Memphis Bar Association Leadership Forum.



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.



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.

7.3

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

[University of Tennessee at Chattanooga](#)

[University of Tennessee Health Science Center](#)

[University of Tennessee, Knoxville](#)

[University of Tennessee at Martin](#)

[University of Tennessee Southern](#)



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.



THE UNIVERSITY OF
TENNESSEE
SYSTEM

<https://titleix.tennessee.edu>

The University of Tennessee
Audit Plan Status - May
For the Year Ending December 31, 2026

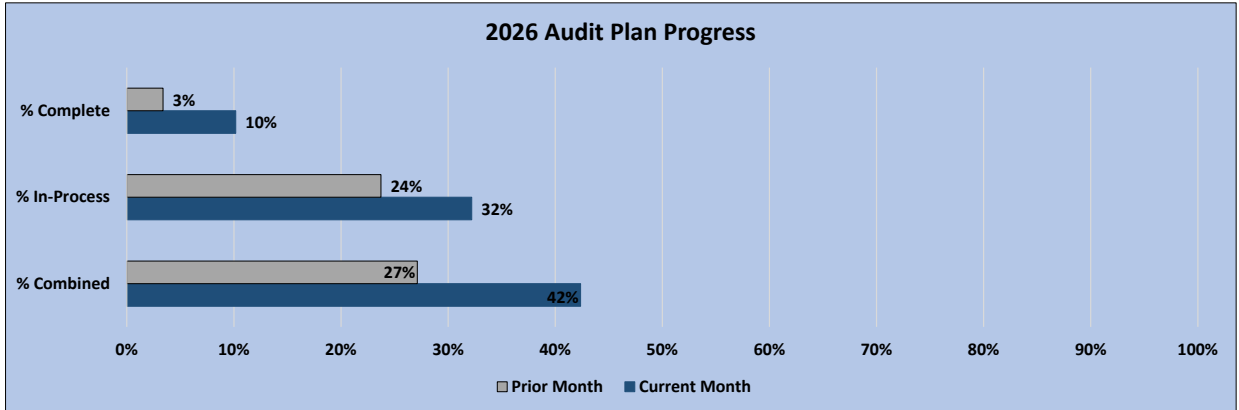
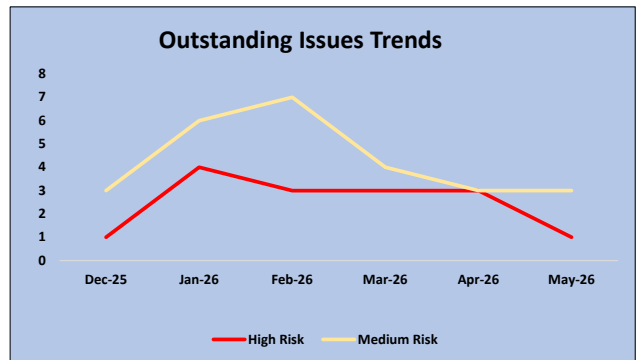
Audit Engagements	Campus	Status
IT: Windows Administration (Carryover)	UTK	In-Progress
Grant Compliance Audit (Carryover)	UTK/UTIA	In-Progress
PCA - Administrative Division (Carryover)	UTC	In-Progress
PCA - Academic Division (Carryover)	UTK	Complete
PCA - Academic Division (Carryover)	UTM	Complete
PCA - Academic Division (Carryover)	UTHSC	In-Progress
PCA - Administrative Division (Carryover)	UTS	Complete
PCA - IT Policy (Carryover)	UTSA	In-Progress
Research Freezers	System-wide	In-Progress
Name, Image, and Likeness Compliance	System-wide	Planned
Background Checks	System-wide	In-Progress
Effort Certification	System-wide	Planned
Off-campus Buildings Maintenance	System-wide	Planned
Third-Party Risk Management	UTSA	In-Progress
Radiation Safety	UTK	Planned
Building Access Controls	UTK	Planned
VolShop	UTK	Planned
Anatomical Gifts Compliance	UTK	Planned
Camps and Clinics	UTC	Planned
Student Fees	UTC	Planned
NAIA Compliance	UTS	Planned
Controlled Substances	UTHSC	In-Progress
HIPAA Data Security	UTHSC	Planned
Camps and Clinics	UTM	In-Progress
Ohio Valley Conference Athletics Special Assistance Funds	UTM	Planned
2026 Complete College Tennessee Act	System-wide	In-Progress
Student Organization Bank Accounts	System-wide	In-Progress
Office of the President	UTSA	Planned
Office of the Chancellor	UTC	Planned
Office of the Chancellor	UTM	Planned
Office of the Chancellor	UTS	Planned
PCA - Academic Division	UTC	Planned
PCA - Academic Division	UTK	Planned
PCA - Administrative Division	UTM	Planned
PCA - Administrative Division	UTHSC	Planned
PCA - IPS or Other Institute	IPS or Other	Planned
PCA - Academic Division	UTS	Planned
PCA - IT Policy	UTSA	Planned

Consulting Engagements	Campus	Status
Internal Controls Mapping - Procurement - Marketplace (Carryover)	System-Wide	In-Progress
Construction Costs - UTK Nursing Building (outsourced) (Carryover)	UTSA/UTK	In-Progress
Construction Costs - UTK Neyland Renovations (outsourced) (Carryover)	UTSA/UTK	In-Progress
Security Camera Systems Access and Controls (Carryover)	UTM	Complete
Student Mental Health Services (Carryover)	System-Wide	Complete
Cybersecurity Governance, Risk, and Controls Consultation (Carryover)	UTSA/System-Wide	Complete
International Travel (Carryover)	UTK	In-Progress
TRIO	UTK	In-Progress
Internal Controls - General Ledger	System-Wide	Planned
Internal Controls - Payroll	System-Wide	Planned
Internal Controls -Accounts Payable	System-Wide	Planned
Internal Controls - Contracting	System-Wide	Planned
Internal Controls - P Cards	System-Wide	Planned
Internal Controls - Sponsored Project Accounting	System-Wide	Planned
Internal Controls - Terminations	System-Wide	Planned
DASH Risk Management Cloud	UTSA	In-Progress
Construction Costs - Lindsey Nelson Stadium (Co-sourced)	UTK	Planned
Campus Project Funding Authority	UTSA	Planned
UTIA International Travel	UTK(UTIA)	In-Progress
Facilities Maintenance and Repair Business Process	UTK	Planned
International Travel	UTC	Planned

Audit and Compliance
Audit Plan Overview - May
For the Year Ending December 31, 2026

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
Audit and Compliance - Internal Quality Assessment Review	UTSA Audit & Compliance	QA	N/A
Department of Housing Policy Compliance	UTS	Audit	Low
Parking and Transportation Policy Compliance	UTK	Audit	Low



7.4



Outstanding High-Priority Audit Issue

As of May 15, 2026

Campus	Audit	Issue	Report Date	Report Remediation Date	Revised Remediation Date	Notes
1 UTK/ UTIA	Extension Shooting Sports	Sensitive Minor Equipment Reporting	1/3/2026	3/31/2026	NA	Failure to report firearms as sensitive minor equipment annually.

7.5



Outstanding Medium-Priority Audit Issues

As of May 15, 2026

7.5

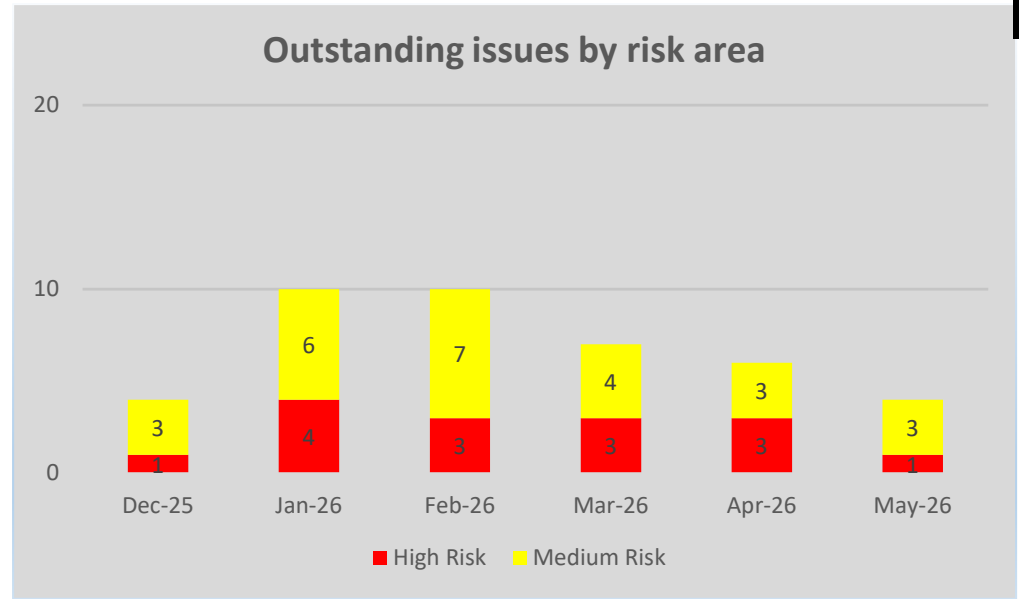
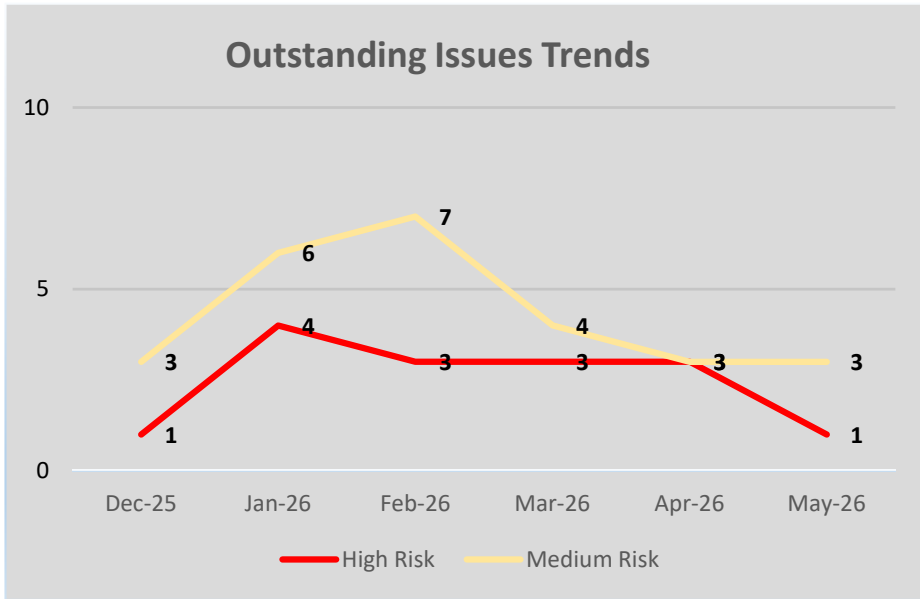
Campus		Audit	Issue	Report Date	Report Remediation Date	Revised Remediation Date	Notes
3	UTIA	4-H Center Operations	Clyde Austin Camp Security	4/28/2025	11/28/2025	1/31/2026	Physical security concerns are being addressed while finalizing the updated Memo of Understanding between parties sharing the location.
4	UTS	ADA Compliance	Lack of formal complaint /grievance process.	1/16/2026	8/19/2026	NA	Lack of a defined complaint or grievance process specifically for ADA issues.
5	UTS	ADA Compliance	General ADA Provisions	1/16/2026	5/5/2026	NA	Elements of ADA Subpart A including a dedicated ADA coordinator, a centralized office providing ADA services, and a dedicated ADA platform website are not in place.



Issues by Priority Rating

As of May 15, 2026

7.5





7.6



2026 Institutional Compliance Plan

Sarah T. Pruett, PhD

2026 Compliance Initiatives

7.6

A connected, risk-based approach to Institutional Compliance



Ethics and Outreach Sets expectations and reinforces a culture of integrity through communication and engagement.



Policy Development Establishes clear, consistent standards aligned with regulatory requirements and institutional priorities.



Monitoring Identifies risk, assesses effectiveness, and informs continuous improvement through coordinated oversight.



Team Development Builds capacity and sustainability through training, cross-functional collaboration, and shared accountability.

Institutional Compliance Plan Update



Risk mitigation ADA web compliance support continues through the launch of detection and remediation tools (Note – federal deadline extension of 1 year); Privacy awareness training and resources are under evaluation; Safety peer reviews are in progress.



Policy development is underway for Research (human and animal subjects research, authorship, and sponsored projects, research security - Visiting Scholars, International Engagement, and International Travel), Safety (Multiple procedures and Drone policy under review), Human Resources (multiple policies being revised) and Fiscal (multiple including new internal controls policy).



Monitoring Campus committee education on updated risk-based approach underway. Regulatory framework under review to inform future compliance risk assessments. Tennessee Financial Integrity Act evaluation plan is being drafted.



Team Development Cross-training staff to increase depth and breadth of office expertise.

7.6



THE UNIVERSITY OF TENNESSEE SYSTEM

TREASURER

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: Ms. Andrea Addis *aa*

DATE: June 2, 2026

SUBJECT: Travel Exception Report

7.7

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, 2026, 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