

21-108 Title IX Compliance

EXECUTIVE SUMMARY

We have completed our audit of the Title IX Compliance. This audit was performed at the request of the UTHealth Audit Committee and was conducted in accordance with the *International Standards for the Professional Practice of Internal Auditing*.

Background

Handbook of Operating Procedures (HOOP) Policy Number 59 – *Prohibition of Sexual Harassment & Sexual Misconduct* defines prohibited conduct, reporting requirements, methods of reporting and responding to allegations, resources and supportive measures, the grievance process, sanctions and remedies, and training.

Objectives

Our objective was to determine whether UTHealth complies with requirements of Title IX Regulations. Specifically, we wanted to determine if:

- Policies and procedures comply with regulations
- Training and education documentation comply with regulations
- Incident reporting and grievance processes comply with regulations
- Institutional reporting comply with regulations

Scope

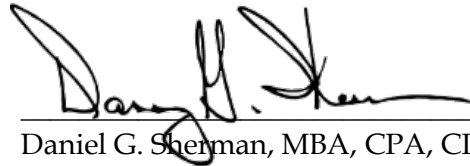
- The scope covered the period January 1, 2020 to March 31, 2021.

Conclusion

Overall, processes have been developed and implemented around Title IX compliance, which are adequate and functioning as intended. We noted two opportunities for improvement that were addressed by management and verified prior to the completion of our audit procedures. The first was to include a link on the Medical School webpage to the Title IX site and the second was to include some required information in the training slides provided at new student orientation. Both of these items were deemed low risk.

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We would like to thank the Title IX Coordinator and Diversity & Equal Opportunity Office staff and management who assisted us during our review.



Daniel G. Sherman, MBA, CPA, CIA
Associate Vice President & Chief Audit Officer

Number of Priority Findings Reported to UT System

None

Mapping to the FY 2021 Risk Assessment

Reference	Risk	Risk Rating
FIN 18	School websites do not include required notices.	Medium
FIN 85	Grievance processes have not been revised to comply with recent changes to regulations, including SB 212.	High
FIN 100	Department managers are not aware of the accurate and appropriate application of Title IX complaints.	High
FIN 105	Confidentiality for procedures related to sexual misconduct or harassment is not maintained.	High
FIN 118	Individuals may intentionally file a false complaint.	High

Data Analytics Utilized

None

Auditing & Advisory Services Engagement Team

AVP/CAO - Daniel G. Sherman, MBA, CPA, CIA
Audit Manager - Nathaniel Gruesen, MBA, CIA, CISA, CFE
Auditor Assigned - Chandra Jones, CPA, CHIAP®

End of Fieldwork Date

June 23, 2021

Issue Date

July 7, 2021

Copies To

Audit Committee
Ana Touchstone
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Dr. Margaret McNeese