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.
21-108 Title IX Compliance

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

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

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
Kevin Dillon
Dr. Margaret McNeese