# The University of Tennessee
## Title VI Compliance Report and Implementation Plan
### FY 2021-2022
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</table>
2. Overview

The University of Tennessee (UT) is a state institution of public higher education. UT was founded in 1794 as Blount College. In 1869, the University of Tennessee was established and designated as a land-grant institution as part of the Morrill Act of 1862, (Tenn. Code Ann. 49-9-102), pursuant to which UT established its Institute for Agriculture and UT Experiment Stations (now known as AgResearch). The University is governed by the Board of Trustees (Tenn. Code Ann. 49-9-201). Its powers are listed in Tenn. Code Ann. 49-9-209.

On June 30, 2022, the UT System was composed of the Chattanooga (Tenn. Code Ann. 49-9-901 et seq.), Knoxville, Martin (Tenn. Code Ann. 49-9-1001 et seq.) and UT Southern (Tenn. Code Ann. 49-9-1101 et seq.) campuses; the Health Science Center in Memphis, which includes the statutorily required College of Medicine (Tenn. Code Ann. 49-9-701); the Institute for Public Service, which exists to provide continuing research and technical assistance to state and local government and industry and to meet more adequately the need for information and research in business and government. (Tenn. Code Ann. 49-9-401 et seq.); the Institute of Agriculture, which includes UT Extension (Tenn. Code Ann. 49-9-301) and the statutorily required College of Veterinary Medicine (Tenn. Code Ann. 49-9-801); the Space Institute in Tullahoma (Tenn. Code Ann. 49-9-601); and the System-wide Administration. With UT Extension having offices in all 95 counties, The University of Tennessee has a presence across the entire State of Tennessee. The mission of The University of Tennessee System is as follows:

Serving all Tennesseans and beyond through education, discovery, and outreach that enables strong economic, social, and environmental well-being.

The University spans the State of Tennessee with a network of instructional, research, and service units located in every county.

Mr. Randy Boyd serves as the President of The University of Tennessee. The Senior Vice President and Chief Financial Officer, General Counsel, Senior Vice President/Senior Vice Chancellor of Agriculture, six vice presidents, and the chancellors from the Chattanooga, Knoxville, Martin, and UT Southern campuses, and the Health Science Center report to the president, as does one special advisor.

The University of Tennessee System organizational chart is presented on the next page. The reporting relationships for all departments may be found in Appendix A.
3. **Responsible Officials**
Randy Boyd serves as the president of the University of Tennessee. Mr. Boyd’s information and signature are below.

Mr. Randy Boyd  
President  
The University of Tennessee  
831 Andy Holt Tower  
Knoxville, TN 37996  
utpresident@tennessee.edu

[Signature]

Mr. Randy Boyd, President

Delphia Howze, Chief Inclusion Strategy Officer, serves as the system-wide Title VI Coordinator. Mrs. Howze’s information and signature are below.

Mrs. Delphia Howze  
Chief Inclusion Strategy Officer  
The University of Tennessee  
825 Andy Holt Tower  
Knoxville, TN 37996  
Delphia.howze@tennessee.edu

[Signature]

Ms. Delphia Howze, Executive Director
4. Definitions

Definitions, as utilized across The University of Tennessee System when referring to Title VI matters, are as follows:

1. **Assurances** – A written statement or contractual agreement signed by an authorized subrecipient official in which the subrecipient agrees to administer federally funded assisted programs in accordance with civil rights laws and regulations.

2. **Beneficiaries** – Those persons to whom The University of Tennessee provides instructional, research, or public service assistance, service, or benefits.

3. **Compliance** – The fulfillment of the requirements of Title VI and other applicable laws and implementing regulations and instructions to the extent that no distinctions are made in the delivery of any service or benefit on the basis of race, color, or national origin.

4. **Contractor** – A person or entity that performs services for The University of Tennessee at a specified price.

5. **Discrimination** – To make any distinction between one person or group of persons and others, either intentionally, by neglect, or by the effect of actions or lack of actions based on race, color, or national origin.

6. **Federal Assistance** – Any funding, property, or aid provided for the purpose of assisting a beneficiary.

7. **Noncompliance** – Failure or refusal to comply with Title VI of the Civil Rights Act of 1964, other applicable civil rights laws, and implementing regulations.

8. **Subrecipient** – Any entity or individual with which The University of Tennessee contracts to perform services funded in whole or in part by federal funds.

9. **Vendor** - A person or entity that supplies goods or services at an agreed-upon price, at the promised time, and without the need for the University's intervention, renegotiation, or continued expediting.
5. Non-Discrimination Policy

All University of Tennessee programs are accessible without regard to race, color, or national origin. UT has a full EEO/AA Statement/Non-Discrimination Statement that is required to be included in position announcements (not paid advertisements) sent to potential referral sources, catalogs, application forms, posters, and other material used in conjunction with the referral and/or recruitment of students, faculty or staff, and publications which contain general information and are made available to alumni/ae, faculty, staff, students or other participants in, or beneficiaries of, University programs. The statement reads as follows:

The University of Tennessee is an EEO/AA/Title VI/Title IX/Section 504/ADA/ADEA institution in the provision of its education and employment programs and services. All qualified applicants will receive equal consideration for employment without regard to, and will not be discriminated against on the basis of, race, color, national origin, religion, sex, pregnancy, marital status, sexual orientation, gender identity, age, physical or mental disability, or covered veteran status.

Inquiries and charges of violation of Title VI (race, color, national origin), Title IX (sex), Section 504 (disability), ADA (disability), ADEA (age), sexual orientation, or veteran status should be directed to <each campus/institute Equity & Diversity Office...with contact information>.

In addition to the non-discrimination statement above, the University of Tennessee has two Human Resources policies regarding discrimination, HR0220 (Equal Employment Opportunity) and HR0280 (Sexual Harassment and Other Discriminatory Harassment). Please see Appendix B (Non-discrimination Policies) for these policies.

The University of Tennessee and its subrecipients and/or contractors shall make available any compliance report to be reviewed by the Tennessee Human Rights Commission (THRC) upon request.
6. Civil Rights Office

The University of Tennessee is organized to effect compliance and implement civil rights enforcement by providing coordination of effort through the System Administration and placing responsibility for implementation at the campus level. Mrs. Delphia Howze, Chief Inclusion Strategy Officer, has overall responsibility for Title VI activities and compliance while the chancellors are responsible for their individual campuses and institutes.

Each campus and institute have a named individual in its Equity and Diversity office who coordinates Title VI activities and monitors compliance with Title VI in accordance with federal and state laws. The campus/institute Title VI coordinators are listed below:

Chattanooga:
- Ms. Stacy Lightfoot, Vice Chancellor of Diversity & Engagement
  - Ms. Rosite Delgado, Director of Equity & Inclusion
  - Ms. Susan Gutshall, Compliance Officer
  - Ms. Charlene Ragland, Assistant Director, Talent Acquisitions & Operations
  - Mr. Antole Thelwell, Compliance Officer

Health Science Center (Memphis):
- Dr. Michael Alston, Associate Vice Chancellor, Equity & Diversity
  - Ms. Abigail Caritan, Sr. Administrative Specialist
  - Ms. Miriam Ghandi, Program Associate
  - Ms. Isabella Porcaro, Learning Assurance Officer
  - Ms. Michelle Sisco-Sankri, Sr. Compliance Resolution Officer
  - Ms. Tiffinie Snowden, Inclusion Engagement Officer

Knoxville Area (Knoxville, Institute for Public Service, Institute of Agriculture, System Administration):
- Ms. Katrice Morgan, Associate Vice Chancellor and Executive Director, Equity & Diversity
  - Ms. Nicole Cangey, Operations & Administration Coordinator
  - Ms. Rachel Dey, Assistant Director & Compliance Officer
  - Ms. Jill Malolepszy, Associate Director & Deputy ADA Coordinator

Martin:
- Mr. Marquis McCloud, Chief Diversity & Inclusion Officer
  - Ms. Jessica Copeland, Diversity & Inclusion Specialist
  - Ms. Dominique Crockett, Director, Equity & Diversity

Southern (Pulaski):
- Ms. Sarah Catherine Richardson, Dean of Students

Space Institute (Tullahoma):
- Ms. Patricia Burks-Jelks, Director, Human Resources and Equity & Diversity
The responsibilities of the campus/institute Title VI coordinators are listed below.

**Title VI Coordinator Responsibilities**

- Assures compliance with Title VI regulations.
- Investigates and resolves Title VI complaints. Establishes the process for complaint resolution and enforcement actions.
- Records and reports the number and disposition of complaints received each fiscal year.
- Notifies the public, employees, and students about Title VI requirements. Documents the specific procedures used for publicizing and distributing Title VI information (brochures, posters, etc.).
- Distributes Limited English Proficiency (LEP) information to all parties who may be involved in LEP services.
- Oversees the implementation of LEP services, including coordinating language translation services as necessary.
- Provides demographic data of advisory councils and committees.
- Provides Title VI training.
- Provides an annual summary of employment utilization statistics.
7. Discriminatory Practices

In addition to the Non-Discrimination statement provided in Section 5 – Non-discrimination Policy, the University uses a short EEO/AA/Non-Discrimination statement in paid advertisements to solicit applications for faculty and staff positions of employment, contracts for goods or services, purchase orders, and brochures and newsletters. The short statement reads as follows:

*The University of Tennessee is an EEO/AA/Title VI/Title IX/Section 504/ADA/ADEA institution in the provision of education and employment programs and services. All qualified applicants will receive equal consideration for employment without regard to race, color, national origin, religion, sex, pregnancy, marital status, sexual orientation, gender identity, age, physical or mental disability, or covered veteran status.*

Examples of prohibited discriminatory practices as related to Title VI include:

1. Denial of admission to The University of Tennessee on the basis of race, color, or national origin.
2. Assignment of on-campus housing or use of other facilities on the basis of race, color, or national origin.
3. Denial of academic or student support services on the basis of race, color, or national origin.
4. Denial of scholarships or other financial aid on the basis of race, color, or national origin.
5. Discrimination in hiring, employment, and working conditions on the basis of race, color, or national origin.
6. Denial of any services, or other benefits for which individuals are otherwise qualified on the basis of race, color, or national origin.
8. Federal Programs or Activities

The University of Tennessee receives federal funding from numerous sources. As an institute of higher education, UT falls under the provision of 42 U.S.C. § 2000d that “no person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.”

The federal funding sources, purposes of the assistance, and the dollar amount of each instance of assistance for The University of Tennessee appear in Appendix C (Federal Financial Assistance). The information in Appendix C includes all programs, federal grants, loans or subsidies, equipment, training resources, land, loans, and/or details of federal personnel.

The University of Tennessee received a total of $640,597,572.59 in federal assistance during fiscal year 2021/2022. Please note that many FFA sources provide more than one instance of assistance.

At this time, an additional $92,380,192.61 of Federal Financial Assistance is expected to begin during the 2022/2023 fiscal year. Please see Appendix D (Pending FFA) for details.
9. Data Collection and Analysis

The University of Tennessee utilizes two systems to record student and employee data. For student data, each campus has a separate account with the Banner Student System. The information at the end of this section regarding student enrollment by race and minority representation and number of degrees awarded by race and minority representation is produced using each campus’ Banner system.

SAP software is used for all human resources/payroll activities and reports. The information at the end of this section regarding Federal Work Study participation by race/ethnicity and nationality, and employees by race/ethnicity and nationality is generated using the University’s SAP Enterprise system.

In addition, each federally funded program or activity is evaluated by the grant recipient in conjunction with the requirements of the grant. The evaluation data is reported directly back to the grantor, not to the campus/institute Title VI coordinator.

The estimated population of the State of Tennessee on July 1, 2021, was 6,975,218 people. * The chart below shows the estimated July 1, 2021, population breakdown by ethnicity and race of the State of Tennessee. *

<table>
<thead>
<tr>
<th>Ethnicity/Race</th>
<th>Percentage of Population</th>
</tr>
</thead>
<tbody>
<tr>
<td>American Indian/Alaskan Native</td>
<td>0.5%</td>
</tr>
<tr>
<td>Asian</td>
<td>2.0%</td>
</tr>
<tr>
<td>Black or African American</td>
<td>17.0%</td>
</tr>
<tr>
<td>Hispanic/Latino</td>
<td>6.1%</td>
</tr>
<tr>
<td>Native Hawaiian or Alaskan Native</td>
<td>0.1%</td>
</tr>
<tr>
<td>Multi-racial</td>
<td>2.2%</td>
</tr>
<tr>
<td>White</td>
<td>73.1%</td>
</tr>
</tbody>
</table>

*Source: https://www.census.gov/quickfacts/TN
The chart below shows the minority representation of the 53,106 students enrolled in Fall 2021.

### Student Enrollment

<table>
<thead>
<tr>
<th>Race/Ethnicity</th>
<th>Number of Students Enrolled</th>
<th>Percentage of Total Enrollment</th>
</tr>
</thead>
<tbody>
<tr>
<td>American Indian/Alaskan Native</td>
<td>84</td>
<td>0.16%</td>
</tr>
<tr>
<td>Asian</td>
<td>1868</td>
<td>3.52%</td>
</tr>
<tr>
<td>Black or African American</td>
<td>3912</td>
<td>7.37%</td>
</tr>
<tr>
<td>Hispanic/Latino</td>
<td>2685</td>
<td>5.06%</td>
</tr>
<tr>
<td>Multi-racial</td>
<td>1924</td>
<td>3.62%</td>
</tr>
<tr>
<td>Native Hawaiian or Other Pacific Islander</td>
<td>23</td>
<td>0.04%</td>
</tr>
<tr>
<td>Non-Resident Alien</td>
<td>1325</td>
<td>2.50%</td>
</tr>
<tr>
<td>White</td>
<td>40456</td>
<td>76.18%</td>
</tr>
<tr>
<td>Unknown</td>
<td>829</td>
<td>1.56%</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>53106</strong></td>
<td><strong>100%</strong></td>
</tr>
</tbody>
</table>

The chart below shows the minority representation of the 12,886 students who graduated during the 2020-2021 academic year.

### Degrees Awarded

<table>
<thead>
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<th>Race/Ethnicity</th>
<th>Number of Degrees Awarded</th>
<th>Percentage of Degrees Awarded</th>
</tr>
</thead>
<tbody>
<tr>
<td>American Indian/Alaskan Native</td>
<td>34</td>
<td>0.26%</td>
</tr>
<tr>
<td>Asian</td>
<td>501</td>
<td>3.89%</td>
</tr>
<tr>
<td>Black or African American</td>
<td>963</td>
<td>7.47%</td>
</tr>
<tr>
<td>Hispanic/Latino</td>
<td>520</td>
<td>4.04%</td>
</tr>
<tr>
<td>Multi-racial</td>
<td>355</td>
<td>2.75%</td>
</tr>
<tr>
<td>Native American/Other Pacific Islander</td>
<td>0</td>
<td>0.00%</td>
</tr>
<tr>
<td>Non-Resident Alien</td>
<td>355</td>
<td>2.75%</td>
</tr>
<tr>
<td>Unknown</td>
<td>229</td>
<td>1.78%</td>
</tr>
<tr>
<td>White</td>
<td>9929</td>
<td>77.05%</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>12886</strong></td>
<td><strong>100%</strong></td>
</tr>
</tbody>
</table>

The chart below shows the minority representation of the 1,115 University of Tennessee students participating in the Federal Work Study Program for the 2021-2022 academic year.
The University of Tennessee is not subject to the TEAM Act and thus does not have Executive Staff and Preferred Staff. The breakdown of the University’s 13,010 Regular workforce by race/ethnicity and national origin on June 30, 2022, is shown below.
<table>
<thead>
<tr>
<th>Nationality</th>
<th>American Indian/Alaskan Native</th>
<th>Asian</th>
<th>Black or African American</th>
<th>Hispanic/Latino</th>
<th>Native Hawaiian or Other Pacific Islander</th>
<th>White</th>
<th>Multi-Racial</th>
<th>Total</th>
<th>Percentage of Total Employees</th>
</tr>
</thead>
<tbody>
<tr>
<td>Gambian</td>
<td>1</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>1</td>
<td>1</td>
<td>1</td>
<td>0.01%</td>
</tr>
<tr>
<td>Georgian</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>1</td>
<td>1</td>
<td>1</td>
<td>0.01%</td>
</tr>
<tr>
<td>German</td>
<td></td>
<td>31</td>
<td>31</td>
<td></td>
<td></td>
<td></td>
<td>31</td>
<td>31</td>
<td>0.24%</td>
</tr>
<tr>
<td>Ghanaian</td>
<td>11</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>11</td>
<td>11</td>
<td>11</td>
<td>0.08%</td>
</tr>
<tr>
<td>Greek</td>
<td></td>
<td>9</td>
<td>9</td>
<td></td>
<td></td>
<td></td>
<td>9</td>
<td>9</td>
<td>0.07%</td>
</tr>
<tr>
<td>Guatemalan</td>
<td>1</td>
<td></td>
<td>2</td>
<td></td>
<td></td>
<td>3</td>
<td>2</td>
<td>3</td>
<td>0.02%</td>
</tr>
<tr>
<td>Guyanese</td>
<td>1</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>1</td>
<td>1</td>
<td>1</td>
<td>0.01%</td>
</tr>
<tr>
<td>Haitian</td>
<td>1</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>1</td>
<td>1</td>
<td>1</td>
<td>0.01%</td>
</tr>
<tr>
<td>Honduran</td>
<td>2</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>2</td>
<td>2</td>
<td>2</td>
<td>0.02%</td>
</tr>
<tr>
<td>Hong Kong</td>
<td>3</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>3</td>
<td>3</td>
<td>3</td>
<td>0.02%</td>
</tr>
<tr>
<td>Hungarian</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>2</td>
<td>2</td>
<td>2</td>
<td>0.02%</td>
</tr>
<tr>
<td>Indian</td>
<td>170</td>
<td>1</td>
<td>1</td>
<td>1</td>
<td>174</td>
<td></td>
<td>30</td>
<td>87</td>
<td>1.34%</td>
</tr>
<tr>
<td>Indonesian</td>
<td>7</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>7</td>
<td>7</td>
<td>7</td>
<td>0.05%</td>
</tr>
<tr>
<td>Iranian</td>
<td>4</td>
<td></td>
<td></td>
<td></td>
<td>26</td>
<td>30</td>
<td>30</td>
<td>30</td>
<td>0.23%</td>
</tr>
<tr>
<td>Iraqi</td>
<td>2</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>2</td>
<td>2</td>
<td>2</td>
<td>0.02%</td>
</tr>
<tr>
<td>Irish</td>
<td>2</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>2</td>
<td>2</td>
<td>2</td>
<td>0.02%</td>
</tr>
<tr>
<td>Israeli</td>
<td>1</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>1</td>
<td>1</td>
<td>1</td>
<td>0.01%</td>
</tr>
<tr>
<td>Italian</td>
<td>21</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>21</td>
<td>21</td>
<td>21</td>
<td>0.16%</td>
</tr>
<tr>
<td>Ivory Coast</td>
<td>1</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>1</td>
<td>1</td>
<td>1</td>
<td>0.01%</td>
</tr>
<tr>
<td>Jamaican</td>
<td>5</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>5</td>
<td>5</td>
<td>5</td>
<td>0.04%</td>
</tr>
<tr>
<td>Japanese</td>
<td>15</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>15</td>
<td>15</td>
<td>15</td>
<td>0.12%</td>
</tr>
<tr>
<td>Jordanian</td>
<td>2</td>
<td>1</td>
<td>6</td>
<td></td>
<td></td>
<td>9</td>
<td>9</td>
<td>9</td>
<td>0.07%</td>
</tr>
<tr>
<td>Kenyan</td>
<td>2</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>2</td>
<td>2</td>
<td>2</td>
<td>0.02%</td>
</tr>
<tr>
<td>Korean</td>
<td>55</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>55</td>
<td>55</td>
<td>55</td>
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</tr>
<tr>
<td>Nationality</td>
<td>American Indian/Alaskan Native</td>
<td>Asian</td>
<td>Black or African American</td>
<td>Hispanic Latino</td>
<td>Native Hawaiian or Other Pacific Islander</td>
<td>White</td>
<td>Multi-Racial</td>
<td>Total</td>
<td>Percentage of Total Employees</td>
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<tr>
<td>Saudi Arabian</td>
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<td>2</td>
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<td>2</td>
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<tr>
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<tr>
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<tr>
<td>Thai</td>
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<td>0.03%</td>
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<td>3</td>
<td>0.02%</td>
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<tr>
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<td>0.01%</td>
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<tr>
<td>Zimbabwean</td>
<td>1</td>
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<td>0.01%</td>
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<tr>
<td><strong>TOTAL</strong></td>
<td><strong>32</strong></td>
<td><strong>896</strong></td>
<td><strong>1618</strong></td>
<td><strong>387</strong></td>
<td><strong>9936</strong></td>
<td><strong>128</strong></td>
<td><strong>13010</strong></td>
<td><strong>100.00%</strong></td>
<td></td>
</tr>
</tbody>
</table>

% by Race/Ethnicity: 0.25%  6.89%  12.44%  2.97%  0.10%  76.37%  0.98%  100.00%
10. Limited English Proficiency (LEP)

The University of Tennessee’s procedures and plans utilize several resources to deliver LEP services. Equity and Diversity offices at each campus/institute have information about Avaza Language Services Corporation, Linguistics, and other companies that offer interpreting services. In addition, our Tennessee Language Institute also assists with interpreting. The Equity and Diversity officers make the information available to anyone at the University who is involved in the delivery of LEP services. In addition, the information has been shared with all UT Health Science Center (UTHSC) clinics and county extension offices. This information includes language cards to which a LEP person can point to identify his or her primary language. Under UTHSC supervision, all clinical supervisors know to contact the UTHSC Equity and Diversity officer if they encounter any LEP issues.

The University’s Chattanooga, Knoxville, and Martin campuses each have Centers for International Education. These Centers provide many services to the international community, including opportunities for cultural and language exchange between students, faculty, and other members of the university community from around the world. The Centers routinely engage international students and faculty to provide translation services or to facilitate communication with LEP individuals. The Centers are the primary resources by which UT delivers LEP services to the University community.

The University’s campuses in Knoxville, Chattanooga, and Martin each have academic departments of foreign languages. These departments have faculty members who are fluent in many languages. The faculty members also provide ad hoc LEP services within the University community and are available to the Equity and Diversity offices if needed. Please see Appendix E – Faculty Interpreters for a list of faculty on each campus that are available to interpret. The Tennessee Language Center is also a part of the University of Tennessee and offers language interpretation.

The University of Tennessee encountered LEP requests for 67 distinct languages during fiscal year 2021-2022, with some of the distinct languages being encountered by more than one campus/institute. The chart below shows the breakdown of the types of LEP requests for the past fiscal year.
The University has translated into Spanish its (1) Title VI brochure, (2) E-verify poster, (3) Right to Work poster, (4) Complaint Procedures at UTC, a (5) Study in US Program letter, (6) a Hepatitis B Form, (7) Immunization Requirement Information, and (8) an ESL flyer in Spanish as well as an ESL To Go flyer in multiple languages (please see Appendix F - LEP Documents). When translation of other documents is needed, the University will request that the document be translated into the requested language by either an internal bilingual staff member, our Tennessee Language Center, or by either Avaza or Linguistics. Original documents being submitted for translation will be in final, approved form.

The University believes that its delivery of LEP services is thorough and effective. The University’s primary points of contact with the general public are its clinics and its extension offices. The University will continue to ensure that it makes those clinics and offices aware of the University’s LEP services.

The University’s LEP policy and procedures may be found below.
**Limited English Proficiency Compliance**

The University of Tennessee seeks to fulfill its responsibility under Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d et seq. to provide meaningful access to programs and activities by persons with Limited English Proficiency (LEP). The University of Tennessee is a complex organization with multiple campuses and institutes, as well as many additional services, including an agricultural extension service that provides programming in all 95 counties of the state. As a result, reasonable steps to ensure meaningful access to programs and activities by LEP persons vary wide according to the specific circumstances.

The most basic activities of the University of Tennessee are to provide educational service to its students and to support teaching and research by its faculty. The University evaluates the English language proficiency of its students and teaching faculty and provides various forms of assistance depending upon each fact-dependent circumstance. In some situations, students who need assistance in written English may be placed in special writing classes. In other instances, a student’s studies may be delayed while they attend intensive English language programs. Certain offices may offer special training to assist faculty whose first language is not English. The University makes many of its written communications, especially posters concerning the rights of employees under Title VI, available in English and Spanish.

The University delivers services directly to the public primarily through its clinics and agricultural extension offices. Those offices provide, without cost, the following services:

1. **IDENTIFYING LEP PERSONS AND THEIR LANGUAGE**

   The University will promptly identify the language and communication needs of the LEP person. If necessary, staff will use the language identification card provided by Avaza language services to determine the language. In addition, when records are kept of past interactions with individuals or their family members, the language used to communicate with the LEP person will be included as part of the record.

2. **OBTAINING A QUALIFIED INTERPRETER**

   Supervisors over clinics and extension offices across the state have been informed to contact their Title VI coordinator if the need arises for language translation services. They have been supplied with the Avaza language identification card. Moreover, they have been asked to notify their Title VI coordinator, who is responsible for:

   (a) Maintaining an accurate and current list showing the name, language, phone number and hours of availability of bilingual staff.

   (b) If a bilingual staff member is available from the University’s foreign language departments, that staff member will be asked to assist in verbal or written communications, depending on the circumstances.

   (c) If a bilingual staff member is not available, the Title VI coordinator will contact Avaza and arrange for language translation services. Some LEP persons may prefer or request to use a family member or friend as an interpreter. However, family
members or friends of the LEP person will not be used as interpreters unless specifically requested by that individual and after the LEP person has understood that an offer of an interpreter at no charge to the person has been made by the department or agency. Such an offer and the response will be documented in the person’s file. If the LEP person chooses to use a family member or friend as an interpreter, issues of competency of interpretation, confidentiality, privacy, and conflict of interest will be considered. If the family member or friend is not competent or appropriate for any of these reasons, competent interpreter services will be provided to the LEP person.

Children (e.g., persons under the age of 18) will not be used to interpret, in order to ensure confidentiality of information and accurate communication.

3. PROVIDING WRITTEN TRANSLATIONS

The University makes its Title VI brochure available in Spanish. When translation of other documents is needed, the University will request that the document be translated into the requested language by either an internal bilingual staff member or by Avaza. Original documents being submitted for translation will be in final, approved form.

4. MONITORING LANGUAGE NEEDS AND IMPLEMENTATION

The University continues to assess the need for providing more formal LEP assistance to the general public. In addition, the University will continue to evaluate its procedures for securing outside interpreter services, complaints filed by LEP persons, and feedback from the public and University community.

Individuals who believe they have not been provided meaningful access under Title VI may file a complaint with the campus Title VI officer. Retaliation of any kind against a person who has filed a complaint is prohibited.
11. **Complaint Procedures**

Each campus, plus the Space Institute in Tullahoma, has a Title VI Coordinator who is responsible for Title VI discrimination complaints and investigations. The Knoxville campus coordinator also serves as the coordinator for the Institute for Public Service, the Institute of Agriculture, and the UT System Administration.

Complaints of discrimination should be directed to the campus/institute Office of Equity and Diversity. Sample complaint forms are provided in Appendix G. Use of the form is not required. No matter the format of the written complaint, it must include: (1) the name of the complainant; (2) an explanation of the action or conduct complained of; and (3) the person or department responsible for the action. Each of the campus’ complaint process is provided below.

**Chattanooga**

**Discrimination Complaint Procedure**

The University of Tennessee at Chattanooga welcomes and respects people of all races, creeds, cultures, backgrounds, and sexual orientations. The University values intellectual curiosity, pursuit of knowledge, and academic freedom and integrity. In keeping with those values, UTC policies prohibit the following:

- discrimination against employees, students, or applicants for employment or admission, on the basis of race, color, religion, sex (including sexual harassment, sexual orientation, gender identity, marital status, parental status), national origin, age, disability, or protected veteran status;
- discrimination against other participants in educational programs and activities (which includes certain individuals who are not employees, students, or applicants for employment or admission) on the basis of race, color, national origin, sex, or disability; and
- retaliation against any person who in good faith reports a practice that he/she believes violates non-discrimination policies.

If you are an employee, student, applicant for employment, applicant for admission, or are otherwise a participant in a UT Chattanooga program or activity, and you believe you have been discriminated against in violation of the policies outlined above, the process below is designed to help you resolve your complaint.

**Where and When to File a Complaint**

Complaints of discrimination should be directed to the UT Chattanooga Office of Equity and Inclusion, 720 McCallie Avenue, Second Floor, Dept. 5455, 615 McCallie Avenue, Chattanooga, Tennessee 37403-2598, Telephone (423) 425-5824. **Complaints must be in writing and filed within 300 days of the alleged discriminatory action.** In certain circumstances, at the discretion of the Diversity Officer, complaints filed outside that time limit, or not submitted in writing, may be investigated.
Employees and students are encouraged to attempt to resolve a complaint through the administrative structure of the employment unit or academic department. The Director of Equity and Inclusion will provide assistance to the complainant, employment unit, and/or academic department in order to resolve the complaint. **Supervisors and other administrators who become aware of unlawful discrimination or harassment must take immediate and appropriate action to stop such practices or behaviors and prevent their recurrence.** It is the responsibility of the administrator who receives a complaint or becomes aware of the existence of unlawful discrimination or harassment, to contact the Director of Equity and Inclusion to seek counsel regarding appropriate action.

- Complaints received directly to the Director of Equity and Inclusion will be reported by the director to the appropriate administrator(s), who will attempt to resolve the matter working in conjunction with the Director of Equity and Inclusion. Confidentiality will be maintained to the extent possible.
- If the complaint is not resolved through the methods described above, the Director of Equity and Inclusion may initiate a formal investigation, an informal review, or other form of informal resolution, including mediation.
- A review may be initiated if the complainant presents concerns that may not rise to the level of a full investigation of discrimination or harassment, if a respondent is not readily identifiable, or upon request by the complainant if filed as an informal complaint. This process may include data analysis, review of documentation, and preliminary interviews with people whose involvement is necessary to facilitate a resolution to the complaint. Typically, this would include only the complainant(s) or respondent(s), or departmental leadership if respondents are not identified.
- Following the review, a closing letter with a summary of the review is provided to the complainant. Depending on the outcome of the review, the complaint may be escalated to a full investigation, referred to Human Resources for follow-up, or the Director of Equity and Inclusion may conduct follow-up discussions with departmental leadership. At any point during the informal review process, a complainant may choose to file a formal complaint instead.
- Formal complaints should be submitted in writing to the Director of Equity and Inclusion. The complaint must include (1) the name of the complainant, (2) an explanation of the action or conduct complained of, and (3) the person or department responsible for the action. The complainant should include the resolution sought by the complainant. The head of the responding unit or academic department and the party against whom the complaint has been lodged (respondent) will be notified of the complaint.
- The Office of Equity and Inclusion will conduct an investigation, the nature and scope of which will be determined by the Director of Equity and Inclusion on a case-by-case basis. The investigation may include any or all of the following, as well as such other action as the Director of Equity and Inclusion deems appropriate: interviewing the complainant, interviewing the respondent, interviewing witnesses, submitting questions to, or taking statements from, parties or witnesses, reviewing documents, and/or setting up an investigative committee.
- If an investigative committee is deemed appropriate, the relevant chancellor/vice chancellor/vice president or the president (in the event that the complaint is made against a chancellor/vice chancellor/vice president) will be asked by the Director of Equity and Inclusion to appoint the members of such a committee. The Director of Equity and Inclusion may assist the appropriate administrator in appointing committee members.
• The investigative committee, or the Director of Equity and Inclusion or their designee, if there is no investigative committee, will make findings of fact and will determine whether sufficient evidence exists to support a charge of discrimination. Those findings, together with a statement outlining the basis for them, will be transmitted by the Director of Equity and Inclusion to the appropriate administrator. A copy will also be available to the complainant.

• The appropriate vice chancellor or the chancellor will review the findings, make a determination, and notify the complainant in writing. Within 15 workdays after receipt of that decision, complainants who are in staff nonexempt positions may pursue a grievance under UTC Personnel Policy and Procedure, contained in the UTC Policy and Procedures Manual, if they are not satisfied with the determination.

• If the complainant is not satisfied with the determination and is not eligible to or has not elected to file a grievance, the complainant may appeal in writing within 15 workdays after receipt of the decision to the next higher administrative level. The decision on the appeal will be provided in writing to the complainant. Decisions by the chancellor shall be final and not subject to further appeal.

Individuals who wish to file a Title VI complaint with the Tennessee Human Rights Commission (THRC) have up to 180 days from the date of the discriminatory act. Individuals who wish to file a complaint about employment discrimination may do so with the U.S. Equal Employment Opportunity Commission within 300 days from the date of the discriminatory act.

Health Science Center (Memphis)

UNIVERSITY OF TENNESSEE HEALTH SCIENCE CENTER DISCRIMINATION COMPLAINT PROCEDURE
Any UTHSC employee, student, applicant for admission or employment, or other participant in UTHSC programs or activities, who believes that he or she has been discriminated against on the basis of race, color, sex (including sexual harassment, sexual assault, and sexual violence), sexual orientation, gender identity, pregnancy, marital status, parental status, religion, national origin, age, disability or veteran status is encouraged to use the procedures outlined below for the resolution of his or her complaint. University policy prohibits retaliation against any person who in good faith opposes a practice which he or she believes to be discriminatory or who participates in an investigation of a complaint. Complaints of discrimination should be directed to the Office of Equity and Diversity (OED), 910 Madison Avenue, Suite 826, Memphis, Tennessee 38163 (telephone: 901-448-2112 [voice], 901-448-7382 [TTY]).

Complaints alleging discrimination must be put in writing and signed and filed within 300 days. A complainant may also have the ability to file complaints with external agencies such as the Equal Employment Opportunity Commission (EEOC), the Tennessee Human Rights Commission (THRC), the Office for Civil rights (OCR), and the courts.

✓ Please note that the deadlines for filing with external agencies or courts may be shorter than the deadline established for filing a complaint under this Procedure.

✓ Examples of shorter deadlines include, but are not limited to 180 days to file a complaint under Title VI & Title IX, as well as 300 days to file a complaint under Title VII.

✓ The Tennessee Human Rights Commission (THRC) may investigate allegations of noncompliance with Title VI. If THRC refers a complaint to the University for investigation and resolution, OED will coordinate with the Office of the General Counsel to notify THRC of the commencement of an investigation within ten (10) days of the date of referral. Before OED notifies the complainant about the resolution of a complaint, OED will coordinate with the Office of the General Counsel to submit a summary of the investigation to THRC.
A complaining party may select whether to pursue an Informal or Formal complaint. A complainant may choose to first file an Informal complaint (i.e., excluding sexual assault). If, however, the parties are unable to reach a mutually acceptable resolution of the Informal complaint, a complainant may then file a Formal complaint. Additionally, a complainant may during the Informal complaint process choose to file a Formal complaint instead.

In certain circumstances, at the discretion of OED, complaints filed outside of referenced time limits or that are not put in writing and signed may be investigated.

1. Employees and students are encouraged, but not required, to attempt to resolve a complaint through the administrative structure of the employment unit or academic department. OED will provide assistance to the complainant, employment unit, and/or academic department in order to resolve the complaint.

2. Complaints (other than those involving sexual assault) received directly by OED will be reported by the Assistant Vice Chancellor (or the Assistant Vice Chancellor’s designee) to the appropriate administrator(s), who will attempt to resolve the matter working in conjunction with OED. Confidentiality will be maintained to the extent possible.

3. If the complaint is not resolved through the methods described above, OED may use the following:
   a. Complaints should be submitted in writing to OED. The complaint must include (1) the name of the complainant; (2) an explanation of the action or conduct complained of; and (3) the person or department responsible for the complained of action. The complaint should include the resolution sought by the complainant. The complaint may identify witnesses and other evidence the complainant wants OED to consider in its investigation. The party against whom the complaint has been lodged (respondent) and the appropriate administrator with supervisory responsibility will be notified of the complaint.
   b. OED will conduct an investigation, the nature and scope of which will be determined by OED on a case-by-case basis. The investigation may include any or all of the following, as well as such other action as OED deems appropriate: interviewing the complainant; interviewing the respondent; interviewing witnesses; submitting questions to or taking statements from parties or witnesses; and reviewing documents.
   c. OED will make findings and recommendations. Those findings and recommendations, together with a statement outlining the basis for them, will be transmitted by OED to the appropriate administrator within forty (45) calendar days of receipt of a complaint. A copy will also be sent to the complainant and respondent.
   d. The appropriate administrator(s) will review OED’s findings and recommendations, make a determination, and notify the complainant and respondent of the determination in writing within fifteen (15) calendar days of the receipt of OED’s findings and recommendations.
   e. When the complainant is a student, OED will make a good faith effort to conclude the investigation and resolution of a complaint (i.e., steps 3(b) through 3(d)) within sixty (60) calendar days of the date the receipt of the complaint by OED. If the investigation and resolution of a complaint cannot be completed within that time period, then OED will contact the complainant and respondent and provide an estimated time frame in which the investigation and resolution of a complaint will be completed.
   f. Appeals
i. **Employees:** A complainant or respondent who is an employee who is not satisfied with the determination described in Section 3(d) may appeal in accordance with applicable University policies and procedures, including Human Resources Policy 0525, Human Resources Policy 0640, and the UTHSC Faculty Handbook.

ii. **Students:** Within seven (7) calendar days after receipt of the determination described in Section 3(d), a complainant or respondent who is a student and who is not satisfied with the determination may appeal in writing to the next higher administrative level. The University will inform the complainant and respondent in writing of the person to whom an appeal may be made. Any administrator who receives an appeal shall make a decision on the appeal within ten (10) calendar days of the administrator’s receipt of the appeal. Decisions on appeals shall be provided in writing to the complainant and respondent.

The time limits above are subject to modification on a case-by-case basis due to operational requirements, travel away from campus, in-depth investigations, or other issues that complicate the process or require additional time to reach a thorough and fair resolution of the matter.

The University will take steps to prevent the recurrence of any prohibited discrimination and to correct any discriminatory effects on the complainant and others, if appropriate.

An individual who is subjected to retaliation (e.g., threats, intimidation, reprisals, or adverse employment or educational actions) because he or she (a) made a report of discrimination in good faith, (b) assisted someone with a report of discrimination, or (c) participated in any manner in an investigation or resolution of a report of discrimination, may make a complaint of retaliation under these procedures.

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**Knoxville Area (Knoxville, Institute for Public Service, Institute of Agriculture, System Administration)**

**Discrimination Complaint Procedure**

The University of Tennessee, Knoxville, welcomes and honors people of all races, creeds, cultures, and sexual orientations. The University values intellectual curiosity, pursuit of knowledge, and academic freedom and integrity. In keeping with those values, the policies of UT Knoxville and Knoxville Area Units expressly prohibit the following:

- discrimination against employees, students, or applicants for employment or admission, on the basis of race, color, religion, sex (including sexual harassment, sexual orientation, gender identity, marital status, parental status), national origin, age, disability, or protected veteran status;

- discrimination against other participants in educational programs and activities (which includes certain individuals who are not employees, students, or applicants for employment or admission) on the basis of race, color, national origin, sex, or disability; and

- retaliation against any person who in good faith reports a practice that he/she believes violates non-discrimination policies.
If you are an employee, student, applicant for employment, applicant for admission, or are otherwise a participant in a UT Knoxville program or activity, and you believe you have been discriminated against in violation of the policies outlined above, the process below is designed to help you resolve your complaint.

**Where and when to file a complaint**
Complaints of discrimination should be directed to the UT Knoxville Office of Equity and Diversity, 1840 Melrose Ave., Knoxville, Tennessee 37996-3560, Telephone (865) 974-2498. Complaints must be in writing and filed within 300 days of the alleged discriminatory action. Complaints may also be submitted by completing and submitting the Discrimination Complaint form. In certain circumstances, at the discretion of OED, complaints filed outside that time limit, or not submitted in writing, may be investigated.

1. Employees and students are encouraged to attempt to resolve a complaint through the administrative structure of the employment unit or academic department. OED will provide assistance to the complainant, employment unit, and/or academic department in order to resolve the complaint.

2. Complaints received directly by OED will be reported by the director (or the director’s designee) to the appropriate administrator(s), who will attempt to resolve the matter working in conjunction with OED. Confidentiality will be maintained to the extent possible.

3. If the complaint is not resolved through the methods described above, OED may use the following:

4. Complaints should be submitted in writing to OED. The complaint must include (1) the name of the complainant, (2) an explanation of the action or conduct complained of, and (3) the person or department responsible for the action. The complainant should include the resolution sought by the complainant. The head of the responding unit or academic department and the party against whom the complaint has been lodged (respondent) will be notified of the complaint.

5. OED will conduct an investigation, the nature and scope of which will be determined by OED on a case-by-case basis. The investigation may include any or all of the following, as well as such other action as OED deems appropriate: interviewing the complainant, interviewing the respondent, interviewing witnesses, submitting questions to or taking statements from parties or witnesses, reviewing documents, and/or setting up an investigative committee.

6. If an investigative committee is deemed appropriate, the relevant chancellor/vice chancellor/vice president or the president (in the event that the complaint is made against a chancellor/vice chancellor/vice president) will be asked by OED to appoint the members of such a committee. OED may assist the appropriate administrator in appointing committee members.

7. The investigative committee, or OED if there is no investigative committee, will make findings of fact and will determine whether sufficient evidence exist to support a charge of discrimination. Those findings, together with a statement outlining the basis for them, will be transmitted by OED to the appropriate administrator. A copy will also be available to the complainant.
8. The appropriate administrator(s) will review the OED findings, make a determination, and notify the complainant in writing. Within 15 workdays after receipt of that decision, complainants who are in staff nonexempt positions may pursue a grievance under UT Personnel Policy and Procedure 640, contained in the UT Policy and Procedures Manual, if they are not satisfied with the determination.

9. If the complainant is not satisfied with the determination and is not eligible to or has not elected to file a grievance, the complainant may appeal in writing within 15 workdays after receipt of the decision to the next higher administrative level. The decision on the appeal will be provided in writing to the complainant. Decisions by the chancellor/vice chancellor/vice president may be appealed to the president.

**Time Limits for State and Federal Agencies.**

Complainants who wish to file a complaint with an external agency must be aware that each agency will have a time limit for reporting such a complaint. For example, THRC requires that discrimination complaints be filed within 180 days of the complained-of event. These limits usually run from the last date of unlawful harassment, not the date that the complaint is filed with the agency or resolved with the university.

**Martin**

The University has an Equity and Diversity Officer/Title VI Coordinator responsible for investigating all complaints (harassment, sexual harassment, Title VI, age discrimination, disability discrimination, and employment discrimination based on gender). If you or someone you know believes he/she has been discriminated against, please contact the Equity and Diversity Officer/Title VI Coordinator.

**The complaint procedures for the University of Tennessee at Martin are as follows:**

- A signed, written complaint must be filed within 180 days of the alleged discriminatory act.

- The Equity and Diversity Officer/Title VI Coordinator will investigate all complaints reported to that office. The complaint must include the name, address, and telephone number of the aggrieved victim (complainant); an explanation of the action or conduct complained of; and the name of the accused or department responsible for the discriminatory action. The individual or department/unit in which the complaint is made will be notified of the complaint.

- The Equity and Diversity Officer/Title VI Coordinator or investigative committee appointed by the Chancellor will investigate the complaint, which may include the following:
  - Interview the aggrieved person (complainant).
  - Interview the accused individual or unit/department (respondent).
  - Interview witnesses.
  - Take statements from the complainant, respondent, and witnesses.
  - Review documents provided by the complainant, respondent, witnesses, or the department.

- The Equity and Diversity Officer/Title VI Coordinator or investigative committee will make findings of fact and determine if those facts support a charge of discrimination.
Subsequently, the findings, along with a statement detailing the basis for them, will be submitted by the Equity and Diversity Officer /Title VI Coordinator to the Vice Chancellor responsible for overseeing the person or group against whom the original complaint was filed. The complainant and the accused will receive a copy of the findings. Finally, if the findings support the charge of discrimination, the Equity and Diversity Officer/Title VI Coordinator or investigative committee will consult with the appropriate Vice Chancellor or administrator to determine the appropriate response. The accused may appeal the decision in writing to the Chancellor within fifteen (15) days of the date of the decision.

**Space Institute (Tullahoma)**

**Discrimination Complaint Procedure**

The University of Tennessee Space Institute welcomes and honors people of all races, creeds, cultures, and sexual orientations. The University values intellectual curiosity, pursuit of knowledge, and academic freedom and integrity. In keeping with those values, the policies of The University of Tennessee expressly prohibit the following:

- discrimination against employees, students, or applicants for employment or admission, on the basis of race, color, religion, sex (including sexual harassment, sexual orientation, gender identity, marital status), national origin, age, disability, or protected veteran status;
- discrimination against other participants in educational programs and activities (which includes certain individuals who are not employees, students, or applicants for employment or admission) on the basis of race, color, national origin, sex, or disability;
- sexual misconduct, sexual assault, relationship violence and stalking, and
- retaliation against any person who in good faith reports a practice that he/she believes violates non-discrimination policies.

If you are an employee, student, applicant for employment, applicant for admission, or are otherwise a participant in a UT Space Institute program or activity, and you believe you have been discriminated against in violation of the policies outlined above, the process below is designed to help you resolve your complaint. The “Formal Discrimination & Harassment Complaint Form” may be used to file a complaint of discrimination with the UT Space Institute Office of Equity and Diversity, but it is not required to file a complaint.

Complaints must be in writing and filed within 180 days of the alleged discriminatory action. In certain circumstances, at the discretion of OED, complaints filed outside that time limit, or not submitted in writing, may be investigated. Complaints of discrimination should be directed to the UTSI Office of Equity and Diversity (OED), 411 B. H. Goethert Parkway, Tullahoma, Tennessee 37388-9700, telephone: 931-393-7226, fax: 931-393-7268.

You may print the **UTSI Formal Discrimination & Harassment Complaint Form** and submit it directly to UTSI OED, fax to 931-393-7268, or mail to UTSI Office of Equity and Diversity, 411 B.H. Goethert Parkway, MS-11, Tullahoma, TN 37388-9700.

A complainant may also have the ability to file complaints with external agencies such as the following:

- Individuals who wish to file a Title VI complaint with the Tennessee Human Rights Commission (THRC) have up to 180 days from the date of the discriminatory act.
- Individuals who wish to file a complaint about employment discrimination may do so with the U.S. Equal Employment Opportunity Commission (EEOC) within 300 days from the date of the discriminatory act.
In addition to the University’s complaint process, complaints may also be filed with the Tennessee Human Rights Commission at 1-800-251-3589 or www.tn.gov/humanrights.

The University of Tennessee had one (1) complaint of discrimination based on race, color, or national origin in 2021-2022. Please see Appendix F (Complaint Logs) for campus complaint log templates. Below is a summary of the complaints.

Health Science Center

• 1 complaint based on race. Please see below for detailed information.

Date Received: March 19, 2022
Complainant: Anita Pitts
Respondent: Mark Lackey, DDS

Summary: The complainant Pitts alleged that her professor, Lackey treated her and other Black dental students less favorably than white dental students and believe this was due to their race. The complaint was investigated as a possible violation of UT Policy No. HR 0380 (Sexual Harassment & Other Discriminatory Harassment) with a focus on “Other Discriminatory Harassment” as the alleged basis for the discrimination was race. Investigators met with 4 dental students who identifies as people of color (POC), 2 professors (former students/work with or under Dr. Lackey) who identified as POC and the respondent who identifies as white. The complainant had 4 incidents in which they alleged the discrimination was evident.

OIED findings assert that while there was some tension and frustration between the complainant and respondent, there was not sufficient evidence to support the complainant’s assertion for either of the incidents. Therefore, OIED found that the evidence did not establish a violation of UT policy HR 0280 (sexual Harassment & Other Discriminatory Harassment).

UT timely notified THRC of this complaint in accordance with THRC Rule 1500-01-03-06. UT also submitted a draft investigation report and incorporated feedback from THRC into the final version of the report. UT received notification that its report was verified for compliance.

Response: Pending

The University of Tennessee had no other Title VI federal complaints or lawsuits during fiscal year 2021-2022 alleging discrimination based on race, color, or national origin.

The University of Tennessee is obligated to notify THRC within ten (10) days of the commencement of an investigation and before notifying the complainant of the closure in accordance with THRC rule 1500-01-03-06. A complainant has the right to file with the Federal granting agency.
12. Title VI Training

The University of Tennessee uses an online Title VI training module (please see Appendix H-Title VI Training Slides) for all campuses and institutes. The Title VI training provides a voice-over so those who have sight impairments can hear the training. The training does not include a test or quiz.

Although the training is available year-round, campuses and institutes were divided into three concentrated groups during FY 2021-2022: the Knoxville Campus, the Institute for Public Service, the UT Space Institute, and System Administration in September 2021; the Health Science Center in Memphis in January 2022; and all other entities in April 2022. Reminder emails were sent at scheduled intervals to individuals who had not taken the training. From July 1, 2021 – June 30, 2022, 12,695 out of 13,010 employees took the Title VI online training (97.6% completion rate). This is an increase from the 91.9 percent completion rate from the previous year. As all new employees are hired, they are assigned the Title VI training module to complete.

The University of Tennessee does not conduct Title VI training for its subrecipients. Instead, the University includes a non-discrimination provision in every contract with a subrecipient and requires every subrecipient to provide a statement of assurance regarding their commitment to comply with Title VI. These processes are described in Section XIII, Subrecipient Monitoring, of the Title VI Report and Implementation Plan. The vast majority of the University’s subrecipients are other federally funded institutions who are also subject to Title VI, or other state agencies, who are both subject to Title VI and the oversight of the Tennessee Human Rights Commission. The University annually surveys all subrecipients for compliance with Title VI regulations, including training.

### Title VI Training

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<tr>
<th>Item</th>
<th>Number of Employees</th>
<th>Number of Employees Trained</th>
<th>Percentage of Employees Trained</th>
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</thead>
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<tr>
<td>UT’s Online Training</td>
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<td>12695</td>
<td>97.6%</td>
</tr>
<tr>
<td>Subrecipient Training</td>
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<td>N/A</td>
<td></td>
</tr>
<tr>
<td>Proposed Dates for 2022-2021 Training</td>
<td>Available July 1, 2022 - June 30, 2023</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>13010</strong></td>
<td><strong>12695</strong></td>
<td><strong>97.6%</strong></td>
</tr>
</tbody>
</table>

The University of Tennessee currently has the Title VI training available to all employees. A concentrated plan of emails and notifications to take the annual Title VI training will begin in October 2022 for the Knoxville Campus, the Institute of Public Service, the UT Space Institute, the UT Institute of Agriculture, the Chattanooga campus, UT System Administration. The UT Health Science Center will concentrate their training initiative in January 2023. All other campuses will concentrate their initiative in April 2023.
13. Subrecipient Monitoring

The University of Tennessee has extensive policies and procedures for the monitoring of its subrecipients. As part of the procedures, the University of Tennessee has developed a Subrecipient Monitoring Plan, depending on the perceived riskiness of the subrecipient. The Plan includes reviewing Uniform Guidance audit reports and a review of invoices for a lower-risk entity up to performing a site visit or desk audit for a higher-risk entity. In addition, the subrecipient must submit a completed Title VI survey before the university will execute a subaward.

Pre-award Procedures

Each entity that receives a sub-contract that contains Federal funds must agree to comply with the requirements of Title VI in regard to the provision of educational programs and services. The University of Tennessee requests each subrecipient to complete and return a Subrecipient Profile Questionnaire which is reviewed by the Office of Sponsored Programs. In addition, they must sign an assurance statement that they will comply with the requirements of Title VI. By completing the questionnaire and signing an Assurance of Title VI Compliance, the subrecipient has met the pre-award criteria. A copy of the questionnaire and assurance statement are included at the end of the Subrecipient Monitoring section.

The University of Tennessee reviewed 97 pre-assessment questionnaires and surveys for 282 new subawards during July 1, 2021– June 30, 2022. The 97 pre-assessment questionnaires went to new subrecipients of the university. There were 55 previous subrecipients who received new subawards. According to the University of Tennessee Controller, Mary McDonald, “All of our subrecipient agreements flow through the requirements of the originating federal agencies. Thus, when our subrecipients sign the agreement with the University, they have agreed to the Title VI requirements since they have signed indicating they have agreed to all the requirements of the federal agency (which includes the Title VI requirements). There is not a separate statement. Thus, every subrecipient listed has signed assuring they will abide by Title VI.” Please see Appendix J (Signed Statements of Assurance) for the list of subrecipients who signed a statement of assurance.

The University of Tennessee’s subrecipients are also direct recipients of federal funds, and therefore have pre-existing Title VI compliance obligations. The assurance statement and questionnaire methods have been adopted to ensure compliance of all Title VI requirements, including training, of the University’s subrecipients; therefore, no on-site reviews are conducted.
Post-award Procedures

In conjunction with the Office of Management and Budget (OMB) Uniform Guidance on Subrecipient Monitoring, the University of Tennessee annually surveys subrecipients for compliance with Title VI regulations (a copy of the survey is included at the end of the Subrecipient Monitoring section). In addition, the subrecipient must also re-certify through signing a new assurance statement to confirm the agency’s ongoing compliance with the requirements of Title VI. The annual surveys are collected, reviewed, and retained by the University’s Controller’s Office. The surveys for the 152 subrecipients listed in Appendix I (Subrecipients) were reviewed during the fiscal year, July 1, 2021 – June 30, 2022. Please note that some subrecipients had multiple awards.

The University of Tennessee’s subrecipients are also direct recipients of federal funds, and therefore have pre-existing Title VI compliance obligations. The assurance statement and questionnaire methods have been adopted to ensure compliance of all Title VI requirements, including training, of the University’s subrecipients; therefore, no on-site reviews are conducted.

Subrecipient Title VI Training

The University’s subrecipients are covered under their own Title VI regulations and are required to comply with the provisions of the law such as Title VI training. As a result, the University does not hold its subrecipients to additional training requirements.

Procedures for Noncompliance

If any of the subrecipient survey responses indicate a deficiency, the University of Tennessee will request additional documentation of compliance from the subrecipient. If a subrecipient fails to answer any part of the survey, the University will follow-up with the subrecipient. Any questions which concern compliance deficiencies or action to be taken by the University will be forwarded to an ad-hoc Title VI Advisory Committee for review and disposition. The committee will include, but not be limited to, the appropriate campus Title VI Coordinator and a representative from the Treasurer/Controller Office, Human Resources, and the Office of Academic Affairs. The committee will be advised by the Office of the General Counsel.

Any subrecipient who is found out of compliance with Title VI will receive written notification from the University of Tennessee that the University will suspend, terminate, or reject future contracts with the entity.
No subrecipients were found to be out of Title VI compliance between July 1, 2021 and June 30, 2022.

Identify Subrecipients, Contractors and/or Vendors

During fiscal year 2021-2022, the University of Tennessee had 3,464 active awards to 2,030 unique subrecipients, contractors, and vendors. The total of all awards was $431,199,005.86. Appendix K(Subrecipients, Contractors, and Vendors) provides a list of each contract which includes the subrecipient/contractor/vendor name, the begin and end dates of each contract, the dollar amount of the entire contract, the location of the subrecipient/contractor/vendor, whether the contract is paid by federal, state, or hybrid type of funding, the MWBE designation, the description of the award, whether the contract was subrecipient, contractor, or vendor, and whether the contract was competitive or non-competitive.

During fiscal year 2021-2022, the University of Tennessee had 21 (0.61%) active contracts with subrecipients/contractors/vendors who identified themselves as minority. The 21 contracts amounted to $693,181.22 (0.16%). The breakdown by race is below:

- Black or African American: 11 contracts (0.39%) for $544,266.30 (0.13%).
- Asian: 6 contracts (0.30%) for $22,509.00 (0.005%).
- Hispanic/Latino: 2 contracts (0.06%) for $95,000.00 (0.02%).
- Native American: 2 contracts (0.06%) for $31,405.92 (0.007%)

Please see Appendix L (New Subrecipients, Vendors, Contractors) for a list of new contracts established during fiscal year 2021-2022.

The University of Tennessee’s standard contract term and conditions include an anti-discrimination clause. The following is the contractual provision prohibiting discrimination used by the University of Tennessee. All subrecipients, contractors and/or vendors must agree to the statement.

No person on the grounds of disability, age, race, color, religion, sex, national origin, veteran status or any other classification protected by Federal and/or Tennessee State constitutional and/or statutory law shall be excluded from participation in, or be denied benefits of, or be otherwise subjected to discrimination in the performance of this Contract. The Contractor shall, upon request, show proof of such nondiscrimination, and shall post in conspicuous places, available to all employees and applicants, notice of non-discrimination.

Appendix D (Pending FFA) shows the pending Federal Financial Assistance with other federal agencies. Appendix M (Pending FFA with State & Universities) lists the pending contracts with the state and other universities.
The University of Tennessee is not responsible for any federal program monitoring beyond what is required for post-award monitoring of its subrecipients.
SUBRECIPIENT PROFILE QUESTIONNAIRE

This form is designed to collect information required for compliance with federal regulations such as those governing research with human or animal subjects, conflict of interest disclosures, OMB Uniform Guidance and Federal Register rules and regulations. To ensure that the information provided on the form is accurate and up-to-date, this form must be signed by an authorized institutional representative of the subrecipient. The signed form must be received prior to execution of the subaward.

SECTION A SUBRECIPIENT INFORMATION

Subrecipient Legal Name: 

Subrecipient’s Principal Investigator (PI): 

UT Principal Investigator: 

Prime Sponsor: 

UT Proposal Title: 

Performance Period: Begin: End: 

If this is a renewal have any of the key study personnel changed? If yes, identify change:

Yes  No

Change: 

DUNS #: CAGE Code (required for DOD awards): EIN:

Subrecipient Business Address: 

Street Address City State ZIP+4 Congressional District

Country

Is subrecipient currently registered in SAM.gov? Yes  No (registration is required if Prime Sponsor is a Federal Entity and account must be active and valid)

SECTION B- SPECIAL REVIEW AND CERTIFICATIONS

1. Facilities and Administrative Rates- included in this award have been calculated based on:
Subrecipient federally-negotiated F&A rates for this type of work or a reduced F&A rate that Subrecipient hereby agrees to accept.

If this box is checked, a copy of Subrecipient’s F&A rate agreement must be furnished to UT before a subaward will be issued, please submit along with this subrecipient questionnaire OR include the URL from which the current F&A rate may be obtained:

☐ Other Rates: Please specify in Section D Comments below the basis on which the rate has been calculated.

2. Fringe Benefit Rates- included in the Subrecipient budget have been calculated based on:

☐ Rates consistent with or lower than Subrecipient’s federally negotiated rates.

If this box is checked a copy of Subrecipient’s Fringe Benefit rate agreement must be furnished to UT before a subaward will be issued, submit along with this Subrecipient questionnaire OR include the URL from which the current fringe benefit rate may be obtained:

☐ Other Rates: Please specify in Section D Comments below the basis on which the rate has been calculated.

REGULATORY APPROVALS

3. Human Subjects  ☐ Yes  ☐ No

FWA Number __________________  FWA Approval Date ____________

(If yes: Subrecipient certifies that prior to work conducted on Subaward, appropriate Institutional Review Board (IRB) approvals are in place.)

If “Yes”: Have all key personnel involved completed Human Subjects Training?

☐ Yes  ☐ No

4. Animal Subjects  ☐ Yes  ☐ No

AWA Number __________________  AWA Approval Date ____________

(If yes: subrecipient certifies that prior to work conducted on subaward, appropriate IACUC approvals are in place.)

5. Conflict of Interest

Subrecipient certifies that it has an active institutional conflict of interest policy.

☐ Yes  ☐ No

☐ Subrecipient hereby certifies that it has an active and enforced conflict of interest policy that is consistent with the provision of 42 CFR Part 50, Subpart F “Responsibility of Applicants for Promoting Objectivity in Research.” Subrecipient also certifies that to the best of Institution’s knowledge, (1) all financial disclosures have been made related to the activities that may be funded by or through a resulting agreement, and required by its conflict of interest policy; and (2) all identified conflicts of interest have or will have been satisfactorily managed, reduced or eliminated in accordance with Subrecipient’s conflict of interest policy prior to the expenditures of any funds under any resultant agreement.
6. Subrecipient certifies that is has an acceptable Institutional Plan to meet the responsible conduct of research based on NSF policy, NIH policy or any other federal agency policy as applicable.
   □ Yes  □ No

7. Fiscal Responsibility
   Subrecipient certifies that its financial system is in accordance with generally accepted accounting principles and:
   □ has the capability to identify, in its accounts, all Federal awards received and expended and the Federal programs under which they were received
   □ maintains internal controls to assure that it is managing Federal awards in compliance with applicable laws, regulations, and the provision of contracts or grants
   □ complies with applicable laws and regulations
   □ can prepare appropriate financial statements, including the schedule of expenditures of Federal awards
   □ there are no outstanding audit findings which would impact contract costs. If there are findings, submit a copy of the most recent report that describes the finding and steps to be taken to correct the findings.

SECTION C-SINGLE AUDIT

Does Subrecipient receive an annual audit in accordance with OMB Uniform Guidance?
   □ Yes  □ No

If “Yes”: Has the audit been completed for the most recent fiscal year?
   □ Yes  □ No

If “Yes”: any audit findings reported?
   □ Yes  □ No

Please explain any audit findings:

What is your institution’s fiscal year end date?

Subrecipients receiving an annual audit are required to provide a copy of its most recent single audit report or the Internet URL to the University of Tennessee before a subaward will be issued

Audit Contact Information
   Name
   Address
   City State Zip
   Phone
   Email
URL from which the current single audit may be found:

If Subrecipient does not receive an annual audit in accordance with the OMB Uniform Guidance, please select the appropriate box indicating why the Subrecipient would not be subject to compliance with single audit certification:

- [ ] Non-profit entity expending less than $750,000 per year in Federal and Sub-Federal funds
- [ ] Foreign (non-US) entity
- [ ] For-profit entity that expands Federal or Sub-Federal funds and has DCAA audited rates
- [ ] For-profit entity that does not extend Federal or Sub-Federal funds
- [ ] For-profit entity that does not have annual audits
- [ ] For profit entity that does have annual audits
- [ ] Federal Agency
- [ ] Other

If Subrecipient is a for-profit entity, please indicate whether Subrecipient is a

- [ ] Small Business
- [ ] Large Business

If Subrecipient does not receive a single audit compliant with the OMB Uniform Guidance, please answer the following additional questions:

Does Subrecipient have its financial statements audited or reviewed by an independent accounting firm?

- [ ] Yes
- [ ] No

If yes, please provide a URL from which the copy of the most recent reviewed or audited financial statements can be obtained (or a copy if a URL is not available)

If no, please explain:
SECTION D-COMMENTS

Approved for Subrecipient

The information, certifications and representations above have been read, signed and made by an authorized official of the subrecipient named herein. The appropriate programmatic and administrative personnel involved in this application are aware of agency policy in regard to Subawards and are prepared to establish the necessary inter-institutional agreements with those policies.

Any work begun and/or expenses incurred prior to execution of a subaward agreement are at the subrecipient’s own risk.

(Signature of Subrecipient’s Authorized Official/ Date)

(Type or print name and title of Authorized Official)

(Name of Subrecipient’s Organization/Institution)
ASSURANCE OF TITLE VI COMPLIANCE

Title VI of the Civil Rights Act of 1964, as codified in 42 U.S.C. 2000d, states that:

No person in the United States shall, on the ground of race, color or national origin, be excluded from participation in, be denied the benefits of, or be subject to discrimination under any program or activity receiving federal financial assistance.

Therefore, whenever The University of Tennessee conducts federally funded research through sub-grantees, contractors, or collaborators, the University requires a representative of these entities to certify that the subcontractor will comply with the requirements of Title VI in regard to the provision of educational programs and services and the research program will be conducted in compliance with all requirements imposed by Title VI. You are asked to complete the assurance statement below to document your entity’s compliance with Title VI.

I, __________________________________, have reviewed the protocol or statement of work to be performed under the subcontract between The University of Tennessee and ___________________ (insert name of sub-grantee, contractor, or collaborator), as well as the federal regulations concerning Title VI. I certify that ___________________________ (insert name of sub-grantee, contractor, or collaborator) provides EQUAL OPPORTUNITY in all programs receiving federal financial assistance and that _____________________________ (insert name of sub-grantee, contractor, or collaborator) will conduct the subcontract in compliance with all requirements imposed by Title VI.

____________________________________________
Representative of sub-grantee, contractor, collaborator

__________________
Date

Rev. 7/2012
1. Date of Survey ___________________________
2. Type of Survey Initial_________Annual_______Other_______
3. Name of Entity/School: ________________________________________________
4. Name of Administrative Head: _____________________________________________
   Title: ____________________________________________________________________
5. Name of Title VI and Title IX Coordinator_____________________________________
   Title: ____________________________________________________________________
6. Nondiscrimination Policies: Does your institution/school have a written policy stating that services will be provided to all persons without regard to race, color, national origin, or gender? Yes ___No ___
7. Records: Are permanent records kept of all Title VI complaints? Yes ___No ______
8. In the past twelve months, has your entity/institution received any complaint alleging a Title VI violation? Yes__No ___
9. If yes, use the space below to describe the nature of the complaint and its disposition
_________________________________________________________________________________
_________________________________________________________________________________
_________________________________________________________________________________
10. Dissemination: Is Title VI and Title IX information disseminated to your employees, applicants, students, or other beneficiaries of services? Yes_______No___ If Yes, describe how all beneficiaries are informed.
_________________________________________________________________________________
_________________________________________________________________________________
_________________________________________________________________________________

Declaration of Respondent: I declare that I have completed the data in this self-survey and to the best of my knowledge and belief, it is true, correct, and complete.

_________________________________________________ ___________________
Signature, Position of Individual Completing Survey Date

Declaration of Administrative Head: I declare that I have reviewed and approved the information provided in this self-survey and to the best of my knowledge and belief, it is true, correct, and complete.

________________________________________________   ___________________
Signature, Administrative Head Date
14. Public Notice and Outreach

In addition to the University of Tennessee's Diversity Statement that may be found on its System Inclusion, Diversity, and Engagement website (https://ide.tennessee.edu/diversity-statement), the University has two Human Resources policies that have tangential application to the University’s Title VI mission. Please see Appendix B (Non-discrimination Policies) for those policies.

Through student activities, eligible persons who have been historically underrepresented regarding equal opportunities are encouraged to participate in the University’s educational programs. The most comprehensive availability of the University of Tennessee’s programs and services are published on each campus’ website.

Since each campus/institute has a named Title VI coordinator, each campus/institute includes its complaint procedures on its equity/diversity/inclusion website.

All Board of Trustee meetings are open to the public and are accessible on the internet (live and recorded for later viewing). The minutes and decisions by the Board are posted on its website (trustees.tennessee.edu).

The University of Tennessee advertises executive-level and faculty vacancies in Diverse Jobs in Higher Education and Latinos in Higher Education. Faculty members contribute to articles in magazines such as Diverse Issues in Education. The majority of dissemination of information comes from establishing relationships with a variety of historically diverse professional societies, professional organizations, and historical black colleges and universities.

The University of Tennessee utilizes minority media for the services we offer as well as news releases. Examples of the types of media the university uses include historical minority publications (such as newspapers and periodicals) and media (such as radio stations), and intentional posts on historical minority Facebook groups and other social media platforms. Overall, the university disseminated 27.5 percent of its information involving minority media.

The University of Tennessee interacts with minority organizations and community organizations. Campuses have robust student and employee minority organizations and programs that ranges from speaker’s bureaus to specific academic field professional individuals who come and speak to students about careers. Guidance on applying for grants and scholarships, and free tutors are just some of the things offered. The campuses also support their local Urban League offices.
Board and Advisory Bodies

The University of Tennessee has one governing board and one advisory body. Each group has a website with information about the group, including a list of members. In addition, each campus has alignment to the UT IDE Strategic Alliance. Each group will be discussed below with demographic information provided at the end of the Board and Advisory Bodies section.

**UT Board of Trustees** ([http://trustees.tennessee.edu](http://trustees.tennessee.edu))

The Board of Trustees (BOT) is the governing body of The University of Tennessee, overseeing the educational and operational activities of the statewide University system. The 12-member board is comprised of one (1) ex officio member, who is the Commissioner of Agriculture for the State of Tennessee, 10 members appointed by the Governor of Tennessee, and one (1) non-voting student member appointed by the Board. (Source: UT Board of Trustees website: https://trustees.tennessee.edu/about). According to Article I of the Board of Trustees Bylaws, “As the governing body of The University of Tennessee, the Board of Trustees has full authority and control over the University’s organization and administration, constituent part, and funds. The Board has all powers granted by acts of the General Assembly of the State of Tennessee, including but not limited to those codified in Tennessee Code Annotated § 49-9-202, and all implied power necessary, proper, or convenient for the accomplishment of the mission of the University and the responsibilities of the Board.” In addition to the Board of Trustees, the Knoxville, Chattanooga, Martin campuses and the Health Science Center in Memphis have advisory boards consisting of seven members (five appointed by the governor, plus one student and one faculty member). Vacancies are not posted as they are appointed by the Governor of Tennessee.

**Employee Relations Advisory Board** ([http://hr.tennessee.edu/get-involved/committees-councils/employee-relations-advisory-board/])

The Employee Relations Advisory Board (ERAB) is an internal board that exists at the UT System level to serve as an advisory group to the President of the University of Tennessee with respect to university policies, programs, and practices. The ERAB meets quarterly to discuss employee issues with, and make recommendations to, the University’s senior leaders. Vacancies are not posted as ERAB is an internal advisory board. The board members are representatives from each campus and institute who are elected by their peer campus/institute Employee Relations Committee members.

<table>
<thead>
<tr>
<th>Minority Representation - Boards and Advisory Bodies</th>
<th>Number of Members</th>
<th>American Indian or Alaskan Native</th>
<th>Black or African American</th>
<th>Hispanic/Latino</th>
<th>Native Hawaiian or Other Pacific Islander</th>
<th>Two or More</th>
<th>White</th>
<th>Minority Percentage of Total Members</th>
</tr>
</thead>
<tbody>
<tr>
<td>Board of Trustees</td>
<td>12</td>
<td>2</td>
<td>2</td>
<td>10</td>
<td>17%</td>
<td>0</td>
<td>7</td>
<td>17%</td>
</tr>
<tr>
<td>Employee Relations Advisory Board</td>
<td>9</td>
<td>2</td>
<td>2</td>
<td>7</td>
<td>22%</td>
<td>0</td>
<td>17</td>
<td>22%</td>
</tr>
<tr>
<td>Total</td>
<td>21</td>
<td>0</td>
<td>4</td>
<td>0</td>
<td>17%</td>
<td>0</td>
<td>17</td>
<td>19%</td>
</tr>
</tbody>
</table>
Documentation of Minority Input

As a public entity, The University of Tennessee welcomes input from all State of Tennessee citizens and UT alumni. One of the most popular options available is UTALK, our online e-form means of communication. Individuals may submit their comments/questions/suggestions through UTALK. After submitting the e-form, the information is recorded and the individual will receive a reply, if the contact information was provided by the individual. The e-form provides a field for the individual to include his/her name, but it is not required to protect the individual’s right to privacy. There are no plans to make the name a required field nor to include any race/ethnicity questions so individuals will not fear being able to be identified.

The University of Tennessee has begun conducting surveys among its faculty, staff, and students. One demographic being measured is ethnicity/race. No names are associated with results and care is taken to ensure that individuals cannot be identified.

For senior-level vacancies, a minority representative is included on the search committee. Input is documented according to the University’s guidelines on conducting and recording search materials for senior-level positions. Exempt applicant pools must be reviewed and approved by our equity/diversity/inclusion offices.

The University of Tennessee lists its purchasing policies and procedures for contractors on the Purchasing Office’s website (http://purchasing.tennessee.edu/default.html). In addition, requests for bids are always sent to the local Urban League, the Tennessee Minority Purchasing Council, and the Black Business Contractors. The University of Tennessee is heavily involved with the State of Tennessee Governor’s Office of Diversity Business Enterprise Program (GoDBE) and encourages all minority businesses that contact us to register.

The University of Tennessee does not offer grants to the general public. We do offer scholarships to students. Scholarship information is disseminated through our Admissions offices to our websites, to high schools, junior colleges, etc. Our Admissions offices also have information about federal and state student grants that may be available to eligible students.

The University of Tennessee’s subrecipients would follow the requirements of their own organizations for public notice and outreach.
15. **Compliance Reporting**

In addition to its submission to the Tennessee Human Rights Commission (THRC), The University of Tennessee submits, upon request, its Title VI Implementation Plan to the Division of State Audit. Other state and federal agencies who have requested and received the Title VI Implementation Plan include:

- State of Tennessee Department of Commerce and Insurance
- Tennessee Council of Developmental Disabilities
- Tennessee Department of Transportation
- U.S. Department of Agriculture (required under 7 CFR § 15)

The University of Tennessee posts its Title VI Implementation Plan on its System Inclusion, Diversity, and Engagement website at https://ide.tennessee.edu/title-vi.

The University of Tennessee also supplies, upon request, “Assurances of Compliance” to every state or federal agency with whom the University has a grant or collaboration.

The University of Tennessee did not receive any audits or reviews from a federal or state monitoring agency during fiscal year 2021-2022.
16. Evaluation Procedures

As part of The University of Tennessee’s System Strategic Plan, we annually track several key components: (1) Enhancing Educational Excellence; (2) Expanding Research Capabilities; (3) Fostering Outreach and Engagement; (4) Ensuring Workforce and Administrative Excellence; and (5) Advocating for the UT System. In June 2018, a diversity piece was added to each component. Reported items include (1) the number of participants in the Institute of Public Service’s programs, (2) student enrollment, retention, and graduation, (3) faculty and staff demographics, and (4) research dollar expenditures. Federal student assistance programs, as well as other federally funded programs and activities, are monitored and evaluated by the federal agency controlling the funding.

The Transparent UT website (tennessee.edu/transparency) is available that allows the general public to view statistics, salaries, budgets, UT’s economic impact, and links to student data including enrollment and graduation rates. As other data becomes available, links will be added to the transparency site.

The campus and institute Equity and Diversity Officers meet monthly with the System Chief Inclusion Strategy Officer. In addition to updates and training, the officers discuss and evaluate the University’s non-discrimination efforts and compliance, including Title VI compliance.

Each year, the Board of Trustees is presented information regarding the student population, retention, and graduation rates. The Board of Trustees are also presented with workforce information. The University of Tennessee did not receive any notification of Title VI Compliance deficiencies.