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February 1, 2022

Dr. Diane E. Melby
President
Our Lady of the Lake University
411 S.W. 24th Street
San Antonio, Texas 78207

Dear Dr. Melby,

Our Lady of the Lake University (OLLU) substantially complied with the requirements of Texas Education Code Chapter 51 Subchapters E-2 and E-3 based on our desk review of timely filing of the CEO Certification (E-2), the 18 identified requirements (E-3), and our judgmental sample of reported Title IX cases at (OLLU). The Summary of Results lists the 18 identified E-3 requirements reviewed and results obtained.

Our desk review included:

- Ensuring the timely filing of the CEO Certification with the coordinating board program office;
- Analyzing information available on your public website;
- Submitting a request for a sample of cases to your Title IX administrator; and
- Compiling all information obtained to determine the level of compliance achieved by your institution.

The cooperation of your staff during this engagement is greatly appreciated. If you have any questions or comments on the conduct of this review, please let me know.

Sincerely,

Mark A. Poehl, CPA, CIA, CISA, CFE
Assistant Commissioner, Internal Audit and Compliance

PERFORMED BY:

Mr. Bobby Lane, CFE, CICA, Compliance Specialist
Ms. Elizabeth Steele, Compliance Specialist

CC:

THECB

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Summary of Results

Item Number	Bill Reference by Section	Policy Compliance Requirements	Compliance Assessment
1	51.282 (a)(1)(A)	A "Definitions" page and details prohibited behavior.	No Improvement Recommendations Noted
2	51.282 (a)(2)	Board-approved policy.	
3	51.282 (b)(1)	Included in student handbook and personnel handbook.	
4	51.282 (b)(2)	Dedicated webpage and clearly linked to the IHE homepage.	
5	51.282 (c)	Requires each entering freshman or undergraduate transfer students to attend an orientation on the institution's policy.	
6	51.282 (d)	Prevention and outreach program that addresses required elements.	
7	51.282 (e)(1) and (2)	Protocol addresses counseling resources and must allow course drop.	
8	51.282 (f)	Biennial review and governing board approval of policy revisions.	
9	51.283	Electronic reporting option for an enrolled student or an IHE employee.	
10	51.284	Provides "Amnesty for Students Reporting Certain Incidents".	
11	51.285 (a) and (c)	Procedures for documenting a victim request not to investigate and to notify the victim of the IHE's decision whether it will investigate the alleged incident.	
12	51.286	A disciplinary process for certain violations.	
13	51.287	Protocol for when a student withdraws or graduates with pending disciplinary charges.	

Item Number	Bill Reference by Section	Policy Compliance Requirements	Compliance Assessment
14	51.288	Trauma-informed investigation training to each peace officer employed by an IHE.	No Improvement Recommendations Noted
15	51.289 (1), (2), and (3)	IHE has an MOU with one or more of the following: (1) local law enforcement agencies; (2) sexual harassment, sexual assault, dating violence, or stalking advocacy groups; or (3) hospitals or other medical resource providers.	
16	51.290 (1) and (2)	Provides for at least one or more responsible employee, confidential employee, and student advocate. Responsible employee for the purposes of Title IX; (1) Confidential employee to whom enrolled students may speak confidentially; and (2) Student advocate is an enrolled student to whom an enrolled student may speak confidentially.	
17	51.291	Addresses confidentiality adheres to these requirements stipulated in this sub-section.	
18	51.293	Protocols address equal access for students enrolled at or employees of an IHE who are persons with disabilities.	