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February 11, 2026

Mr. J. W. Crawford III
President
Texas Southern University
3100 Cleburne Street.
Houston, TX 77004

Re: *Review of Requirements related to Sexual Harassment, Sexual Assault, Dating
Violence, and Stalking at Texas Southern University; Compliance Requirements
– Texas Education Code, Chapter 51, Subchapter E-3*

Mr. Crawford,

We've completed the review of requirements related to Sexual Harassment, Sexual Assault, Dating Violence, and Stalking at Texas Southern University. There were no observations to the requirements contained in Texas Education Code (TEC), Title 3, Subtitle A, Chapter 51, Subchapter E-3.

Summary

Texas Southern University complied with the requirements contained in TEC, Title 3, Subtitle A, Chapter 51, Subchapter E-3.

This report will be presented to the Texas Higher Education Coordinating Board in April 2026.

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

Sincerely,



Lesli G. Gattis,
Deputy General Counsel & Interim Administrator for Internal Audit

Review Objective, Scope and Methodologies

Our review objective was limited to reviewing compliance with specific HB-1735 compliance and reporting requirements as codified in TEC, Title 3, Subtitle A, Chapter 51, Subchapter E-3 for the institutions of higher education (IHE). We collaborated with Academic and Health Affairs and agreed our audit scope would be limited to certain criteria as noted in the Summary of Results section in this report.

We further agreed that our role would be to remain neutral in policy matters while providing an objective review regarding the nature and extent of the IHE's compliance with the requirements of HB-1735 for IHEs.

We reviewed the information submitted to THECB, requested follow up information as needed, and performed limited testing to address the review objective.

Background

This review was included in the 2026 Compliance Monitoring Plan. Policy guidance and direction was centralized within the Academic and Health Affairs office.

The 86th Legislature enacted HB-1735, amending Texas Education Code (TEC), Title 3, Subtitle A, Chapter 51, by adding Subchapter E-3 requiring each postsecondary education institution to adopt a policy on sexual harassment, sexual assault, dating violence, and stalking applicable to each student enrolled at and each employee of the institution. Further, Section 51.292(a) authorizes the coordinating board to assess an administrative penalty for failure of the IHE to show substantial compliance with the act.

Additionally, Section 51.292(f) requires the THECB to annually submit its report to the governor, the lieutenant governor, the speaker of the house of representatives and the standing legislative committees with primary jurisdiction over legislation concerning sexual assault at postsecondary educational institutions. The report will include a summary of the postsecondary educational institutions found not to be in substantial compliance as provided by this section and any penalties assessed under this section during the calendar year preceding the date of the report.

Table 1: Subchapter E-3 Compliance Requirements and Summary Results

Bill Reference by Section	Policy Compliance Requirements	Compliance Assessment
51.282 (a)(1)(A)	A "Definitions" page and details prohibited behavior.	Complied
51.282 (a)(2)	Board-approved policy.	Complied
51.282 (b)(1)	Included in student handbook and personnel handbook.	Complied
51.282 (b)(2)	Dedicated webpage and clearly linked to the institution homepage.	Complied
51.282 (c)	Requires each entering freshman or undergraduate transfer students to attend an orientation on the institution's policy.	Complied
51.282 (d)	Prevention and outreach program that addresses required elements.	Complied
51.282 (e)(1) and (2)	Protocol addresses counseling resources and must allow course drop.	Complied
51.282 (f)	Biennial review and governing board approval of policy revisions.	Complied
51.283	Electronic reporting option for an enrolled student or an institution employee.	Complied
51.284	Provides "Amnesty for Students Reporting Certain Incidents".	Complied
51.285 (a) and (c)	Procedures for documenting a victim request not to investigate and to notify the victim of the institution's decision whether it will investigate the alleged incident.	Complied
51.286	A disciplinary process for certain violations.	Complied
51.287	Protocol for when a student withdraws or graduates with pending disciplinary charges.	Complied
51.288	Trauma-informed investigation training to each peace officer employed by an institution.	Complied
51.289 (1), (2), and (3)	Institution has an MOU with one or more of the following: (1) local law enforcement agencies;	Complied

Table 1: Subchapter E-3 Compliance Requirements and Summary Results

Bill Reference by Section	Policy Compliance Requirements	Compliance Assessment
	(2) sexual harassment, sexual assault, dating violence, or stalking advocacy groups; or (3) hospitals or other medical resource providers.	
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.	Complied
51.291	Addresses confidentiality adheres to these requirements stipulated in this sub-section.	Complied
51.293	Protocols address equal access for students enrolled at or employees of an institution who are persons with disabilities.	Complied

Table 2: Potential Penalties for Substantial Noncompliance

Statute and Rule Violations	Institutional Failure to Maintain Substantial Compliance Related to	Potential Annual Penalty
Tex. Educ. Code §51.282; §3.4	Policy Requirements	\$5,000
Tex. Educ. Code §51.282; §3.4	Policy Accessibility	\$5,000
Tex. Educ. Code §51.282; §3.4	Policy Orientation for Students	\$5,000
Tex. Educ. Code §51.282; §3.4	Outreach Program for Students and Employees	\$5,000
Tex. Educ. Code §51.282; §3.4	Policy Review	\$5,000
Tex. Educ. Code §51.283; §3.7	Electronic Reporting Option	\$5,000
Tex. Educ. Code §51.284; §3.5(e)	Amnesty for Students Reporting Certain Incidents	\$30,000
Tex. Educ. Code §51.285; §3.19	Victim Request Not to Investigate	\$5,000
Tex. Educ. Code §51.286; §3.10	Disciplinary Process for Certain Violations	\$30,000
Tex. Educ. Code §51.287; §§3.11, 3.30	Student Withdrawal or Graduation Pending Disciplinary Charges	\$30,000
Tex. Educ. Code §51.288; §3.12	Trauma Informed Investigation Training	\$5,000
Tex. Educ. Code §51.289; §3.13	Memoranda of Understanding Required	\$5,000
Tex. Educ. Code §51.290; §§3.14, 3.15	Responsible and Confidential Employee; Student Advocate	\$30,000
Tex. Educ. Code §51.291; §3.17	Confidentiality	\$60,000
Tex. Educ. Code §51.293; §3.16	Equal Access	\$5,000

PERFORMED BY:

Ms. Jamyen Robinson-Hall, Director, Institutional Assurance

THECB

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