

October 31, 2025

Hon. Stephen West, Co-Chair
Interim Joint Committee on Education
702 Capital Avenue
Annex Room 228
Frankfort, KY 40601

Hon. Scott Lewis, Co-Chair
Interim Joint Committee on Education
702 Capital Avenue
Annex Room 367B
Frankfort, KY 40601

Hon. James Tipton, Co-Chair
Interim Joint Committee on Education
702 Capital Avenue
Annex Room 313
Frankfort, KY 40601

Office of the Attorney General
Kentucky State Capitol
700 Capital Avenue, Suite 118
Frankfort, KY 40601

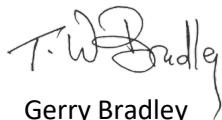
Sent via email: steve.west@kylegislature.gov
scott.lewis@kylegislature.gov
james.tipton@kylegislature.gov

Dear Members of the Legislative Research Commission and Attorney General Coleman:

On behalf of the University of Louisville ("University"), and in accordance with Kentucky's Act Relating to Initiatives Regarding Diversity, Equity and Inclusion (the "Act"), enclosed is a supplemental report of the University detailing its compliance with the Act. Please refer to the Interim Joint Committee on Education, as appropriate.

Please let me know if you have any questions.

Sincerely,



Gerry Bradley
President

Enclosures

University of Louisville

Supplemental Report to LRC and Attorney General (October 2025)

For its supplemental report to the Interim Joint Committee on Education and the Attorney General, the University of Louisville (UofL) submits the following to certify its compliance with House Bill 4 (HB4). This report details the status of the University's compliance with each applicable provision, the steps taken to achieve compliance, and the guardrails established to ensure continued adherence.

As demonstrated in its July submission to the Budget Review Subcommittee and its August submission to the LRC and Attorney General, the University is in compliance with HB4, now codified as KRS 164.2894 et seq. The University's compliance with each provision of the Act is detailed below.

KRS 164.2895(1)(a):

An institution shall not...[e]xcept as provided in subsection 2(n) and (o) of this section, provide any differential treatment or benefits to an individual, including a candidate or applicant for employment, promotion, contract, contract renewal, or admission, on the basis of the individual's religion, race, sex, color, or national origin.

UofL's Response:

Compliance Status

The University is in compliance with this provision.

Compliance Measures Taken

The Office of University Counsel has provided comprehensive training to key personnel regarding the institution's obligations under KRS 164.2894 et seq., Title VI, Title VII, and Title IX. Furthermore, pertinent University policies and procedures, including Human Resources hiring protocols, have been updated to reflect this commitment.

Ongoing and Future Compliance Strategies

To ensure future compliance, the University will provide annual guidance and supplemental training as needed for departments experiencing personnel changes.

In addition to ongoing annual training, HB4-related questions and certifications will be added to the University's Annual Disclosure Form, which must be completed each year by all University employees. These additions will be made on or before December 1, 2025. Also, all new/incoming University Deans and Vice Presidents will be required to complete comprehensive HB4 training and sign an HB4 compliance attestation as a part of the onboarding process.

KRS 164.2895(1)(b):

An institution shall not...[d]iscriminate in student admissions on the basis of religion, race, sex, color, or national origin.

UofL's Response:

Compliance Status

The University is in compliance with this provision and has been since the U.S. Supreme Court's 2023 ruling in *Students for Fair Admissions v. Harvard*.

Compliance Measures Taken

Since 2023, the Office of University Counsel has provided comprehensive training to admissions staff regarding the *SFFA* ruling and the University's Title VI, Title VII, and Title IX obligations. As a part of the HB4 compliance process, the Admissions/Financial Aid/Scholarships Work Group reviewed University practices and policies, and procedures in Admissions, Financial Aid, and scholarship administration to ensure compliance with HB4. Representatives from Undergraduate and Graduate Admissions served as members of this work group and received extensive training. Moreover, all University Deans and Vice Presidents have signed written attestations confirming their understanding of and adherence to relevant state law requirements.

Ongoing and Future Compliance Strategies

Ongoing training will be conducted as needed to ensure future compliance. In addition to ongoing annual training, HB4-related questions and certifications will be added to the University's Annual Disclosure Form, which must be completed each year by all University employees. These additions will be made on or before December 1, 2025. Also, all new/incoming University Deans and Vice Presidents will be required to complete comprehensive HB4 training and sign an HB4 compliance attestation as a part of the onboarding process.

KRS 164.2895(1)(c):

An institution shall not...[e]xcept as provided in subsection 2(l) of this section:

- 1. Impose any scholarship criteria or scholarship eligibility restriction on, or provide differential treatment or benefits to, a scholarship applicant, candidate, or recipient on the basis of an individual's religion, race, sex, color, or national origin; or***
- 2. Execute or renew any legally binding restriction that would require an institution to consider the religion, race, sex, color, or national origin of a scholarship applicant, candidate, or recipient.***

UofL's Response:

Compliance Status

The University is in substantial compliance with this provision, as the process of amending remaining legacy restrictions is actively underway.

Compliance Measures Taken

As a part of the HB4 compliance process, the Admissions/Financial Aid/Scholarships Work Group reviewed University practices and policies, and procedures in Admissions, Financial Aid, and scholarship administration to ensure compliance with HB4. Representatives from Enrollment Management, Financial Aid, and Philanthropy, Advancement and Engagement (PAE) served as members of this work group and received extensive training. Moreover, all University Deans and Vice Presidents have signed written attestations confirming their understanding of and adherence to relevant state law requirements.

The Office of the Provost and the Office of University Counsel continue to work closely with the UofL Foundation, donors, and other departments to update existing scholarship agreements to remove any preferences related to religion, race, sex, color, or national origin.

Ongoing and Future Compliance Strategies

As a primary guardrail to ensure continued compliance, the University has initiated the centralization of its scholarship administration, which will allow for enhanced monitoring of all scholarship practices to ensure they comport with state and federal law and guidance.

In addition to ongoing annual training, HB4-related questions and certifications will be added to the University's Annual Disclosure Form, which must be completed each year by all University employees. These additions will be made on or before December 1, 2025. Also, all new/incoming University Deans and Vice Presidents will be required to complete comprehensive HB4 training and sign an HB4 compliance attestation as a part of the onboarding process.

KRS 164.2895(1)(d):

An institution shall not...[p]rioritize or provide preferential consideration for vendors, contracts, or other transactions based upon the religion, race, sex, color, or national origin of the ownership, management, or staff of any business or nonprofit entity, except that the institution may provide preferential consideration for businesses owned by residents of Kentucky and the United States.

UofL's Response:

Compliance Status

The University is in compliance with this provision.

Compliance Measures Taken

The Office of University Counsel provided training to Procurement personnel and edited solicitation language to ensure compliance, and the University repealed its former policy regarding preferential treatment for minority- and women-owned businesses.

Ongoing and Future Compliance Strategies

To ensure future compliance, the Office of University Counsel will continue to review solicitations and provide training as needed. In addition to ongoing annual training, HB4-related questions and certifications will be added to the University's Annual Disclosure Form, which must be completed each year by all University employees. These additions will be made on or before December 1, 2025. Also, all new/incoming University Deans and Vice Presidents will be required to complete comprehensive HB4 training and sign an HB4 compliance attestation as a part of the onboarding process.

KRS 164.2895(1)(e):

An institution shall not...[m]ake student housing assignments on the basis of religion, sex, race, color, or national origin unless an exception is necessary to:

- 1. Maintain separate living facilities for members of a single biological sex; or***
- 2. Permit need-based access to student housing facilities during school breaks, provided that room assignments are not implemented in a discriminatory manner or segregated by religion, race, color, or national origin.***

UofL's Response:

Compliance Status

The University is in compliance with this provision. The University does not provide preferential or differential treatment to students seeking housing on the basis of religion, race, sex, color, or national origin, except for the provision of single-sex suites, which is exempted under HB4. The University also provides reasonable accommodations as required by the ADA and Section 504 of the Rehabilitation Act.

Compliance Measures Taken

As a part of the HB4 compliance process, the Policy Analysis Work Group reviewed University policies, procedures, programs, and trainings to ensure compliance with HB4. Representatives from the Office of the Provost and Student Affairs—the departments that oversee University housing—served as members of this work group and received extensive training. Moreover, all University Vice Presidents signed written attestations confirming their understanding of and adherence to relevant state law requirements.

Ongoing and Future Compliance Strategies

The Office of University Counsel provides guidance to Housing personnel as needed and will continue to do so to ensure future compliance. In addition to ongoing annual training, HB4-related questions and certifications will be added to the University's Annual Disclosure Form, which must be completed each year by all University employees. These additions will be made on or before December 1, 2025. Also, all new/incoming University Deans and Vice Presidents will be required to complete comprehensive HB4 training and sign an HB4 compliance attestation as a part of the onboarding process.

KRS 164.2895(1)(f):

An institution shall not...[i]nitiate an investigation of a bias incident unless the general counsel for the institution authorizes the investigation and certifies in writing that the investigation is necessary because the conduct being investigated:

- 1. May rise to the level of student-on-student harassment if all facts alleged are taken as true; or***
- 2. Is subject to mandatory investigation pursuant to applicable state or federal law.***

KRS 164.2895(1)(g):

An institution shall not...[h]old a hearing, tribunal, or other disciplinary proceeding on a bias incident unless the general counsel for the institution authorizes the hearing and certifies in writing, after a review of all relevant evidence, that the hearing is necessary to ensure compliance with applicable state or federal law.

UofL's Response:

Compliance Status

The University is in compliance with both provisions.

Compliance Measures Taken

The University revised its investigation policy, now titled *Reports of Bias, Discrimination, and Harassment*, which incorporates the statute's language verbatim. The policy only permits and investigation or hearing if the General Counsel certifies in writing that it is necessary under the exceptions outlined in the statute.

Ongoing and Future Compliance Strategies

Additionally, the University restructured its investigation office, now the Office of Legal Compliance and Investigations, to operate under the General Counsel's purview, thereby ensuring that all allegations are reviewed by the General Counsel before any investigation commences.

KRS 164.2895(1)(h):

An institution shall not...[e]xpend any resources to:

- 1. Establish or maintain a diversity, equity, and inclusion office;***
- 2. Contract or employ an individual to serve as a diversity, equity, and inclusion officer;***
- 3. Provide diversity, equity, and inclusion training or contribute to any cost associated with planning, promoting, hosting, traveling to, attending, presenting, or otherwise participating in diversity, equity, and inclusion training; or***
- 4. Establish or maintain a diversity, equity, and inclusion initiative.***

UofL's Response:

Compliance Status

The University is in compliance with this provision. Prior to the effective date of HB4, the former Department of Inclusive Excellence was renamed the Office of Access and Opportunity ("OAO"), and its mission and objectives were amended to comply with the Act. The Office no longer provides or promotes DEI initiatives and instead focuses on supporting all students and providing a welcoming environment where they can receive guidance to ensure academic and extracurricular success. All programming is open to all students, and no preferential treatment is provided based on protected class.

Compliance Measures Taken

As a part of the HB4 compliance process, the Position Analysis Work Group reviewed OAO positions titles, job descriptions, performance goals, and annual work plans to ensure compliance with HB4. Representatives from Human Resources and Strategic Initiatives served as members of this work group and received extensive training.

Job descriptions were specifically reviewed and amended as needed to ensure that employee responsibilities did not include developing, implementing, or promoting prohibited trainings or initiatives. Any activities identified as potential violations were suspended or modified as appropriate.

Ongoing and Future Compliance Strategies

The Office of the Provost and the Office of University Counsel now provide continuous oversight of the Office of Access and Opportunity, and the Office of University Counsel reviews programming and initiatives to ensure they comport with HB4 and federal law and guidance.

Moreover, the University recently decided to realign the Office of Access and Opportunity to serve under the Office of the Provost to help ensure that OAO objectives squarely align with the goal of achieving student success for all University students. This realignment is consistent with the University's strategic plan and will improve University-wide support for all students.

The University will continue to assess OAO objectives and realign job descriptions, positions, and reporting structures in furtherance of student success objectives.

KRS 164.2895(1)(i):

An institution shall not...[o]n an application for employment, promotion, contract, contract renewal, admission, housing, financial aid, or scholarship, compel, solicit, or consider any pledge or statement on an applicant's experience with or views on religion, race, sex, color, or national origin, except an institution may:

- 1. If an applicant for admission or scholarship submits and unsolicited statement concerning how a matter relating to religion, race, sex, color, or national origin affected his or her life, consider the statement but shall not provide differential treatment or benefits based upon the race, sex, religion, color, or national origin of the applicant; and***
- 2. Require an applicant for housing to disclose his or her biological sex for the purpose of maintaining separate living facilities for members of a single biological sex.***

UofL's Response:

Compliance Status

The University is in compliance with this provision. The University does not solicit or compel statements from applicants regarding their views on protected characteristics.

Compliance Measures Taken

The Office of University Counsel has worked with Admissions, Scholarships, and Human Resources to review legacy solicitations and amend evaluation procedures to ensure compliance and prevent potential differential or preferential treatment. While some applications must request demographic data for federal reporting purposes, the University is actively working with its software vendors to ensure the disclosure of such data is optional for applicants.

Ongoing and Future Compliance Strategies

In addition to ongoing annual training, HB4-related questions and certifications will be added to the University's Annual Disclosure Form, which must be completed each year by all University employees. These additions will be made on or before December 1, 2025. Also,

all new/incoming University Deans and Vice Presidents will be required to complete comprehensive HB4 training and sign an HB4 compliance attestation as a part of the onboarding process.

KRS 164.2895(1)(j):

An institution shall not...[r]equire any student to enroll in or complete an academic course of which the primary purpose is to indoctrinate participants with a discriminatory concept.

UofL's Response:

Compliance Status

The University is in compliance with this provision. While students may be required to take certain courses to meet accreditation standards for a specific degree, they are free to choose from a wide range of courses to satisfy general education requirements.

Compliance Measures Taken

As a part of the HB4 compliance process, the Policy Analysis Work Group reviewed University policies, procedures, programs, and trainings to ensure compliance with HB4. Representatives from the Office of the Provost and Faculty Affairs served as members of this work group and received extensive training. This training included guidance on how to distinguish between instruction and indoctrination. Moreover, all University Deans have signed written attestations confirming their understanding of and adherence to relevant state law requirements.

Ongoing and Future Compliance Strategies

In addition to ongoing annual training, HB4-related questions and certifications will be added to the University's Annual Disclosure Form, which must be completed each year by all University employees. These additions will be made on or before December 1, 2025. Also, all new/incoming University Deans and Vice Presidents will be required to complete comprehensive HB4 training and sign an HB4 compliance attestation as a part of the onboarding process.

KRS 164.2895(1)(k):

An institution shall not...[r]equire or incentivize students, faculty, or staff to attend a diversity, equity, and inclusion training.

UofL's Response:

Compliance Status

The University is in compliance with this provision. The University does not mandate DEI training or expend resources to promote it.

Compliance Measures Taken

As a part of the compliance process, the Policy Analysis Work Group reviewed University policies, procedures, programs, and trainings to ensure compliance with HB4. Representatives from the Office of the Provost and Faculty Affairs served as members of this work group and received extensive training. Moreover, all University Deans and Vice Presidents have signed written attestations confirming their understanding of and adherence to relevant state law requirements.

Ongoing and Future Compliance Strategies

To ensure compliance, the Office of University Counsel has provided training to units that create continuing education courses and now reviews such courses to ensure they do not promote discriminatory concepts or differential treatment of individuals that is not medically required and supported by peer-reviewed evidence.

In addition to ongoing annual training, HB4-related questions and certifications will be added to the University's Annual Disclosure Form, which must be completed each year by all University employees. These additions will be made on or before December 1, 2025. Also, all new/incoming University Deans and Vice Presidents will be required to complete comprehensive HB4 training and sign an HB4 compliance attestation as a part of the onboarding process.

KRS 164.2896(1):

No later than June 30, 2025, each governing board shall:

- (a) Adopt a policy on viewpoint neutrality that prohibits discrimination on the basis of an individual's political or social viewpoint and promotes intellectual diversity within the institution; and***
- (b) Publish the amended policy in the institution's student handbook and faculty handbook and on a prominent, publicly accessible page of the institution's website.***

KRS 164.2896(2):

An institution shall not require any individual to endorse or condemn a specific ideology, political viewpoint, or social viewpoint to be eligible for hiring, contract renewal, tenure, promotion, admission, or graduation.

UofL's Response:

Compliance Status

The University is in compliance with both sections of KRS 164.2896.

Compliance Measures Taken

In accordance with subsection (1)(a), the University's Board of Trustees adopted a comprehensive viewpoint neutrality policy on June 26, 2025. To meet the requirement of subsection (1)(b), the policy was uploaded to the University's online Policy and Procedures Library and published in the Student and Faculty Handbooks.

To further strengthen the University's commitment to free expression, the Board of Trustees approved an amended version of the policy on October 23, 2025. The updated policy (attached) explicitly prohibits discrimination based on political or social viewpoints and contains language fulfilling all requirements of subsection (2), thereby ensuring no individual is subjected to political or ideological litmus tests—or required to endorse or condemn a specific ideology—to be eligible for employment or academic progression.

The amended policy also includes proactive measures that exceed the statute's requirements by requiring the University, as an institution, to refrain from taking positions on social or political issues unless they directly impact the University's mission, operations, or legal requirements. This institutional neutrality ensures that all members of the University community feel free to express their own views without fear of taking a position contrary to that of the University.

Ongoing and Future Compliance Strategies

As a guardrail for future compliance, the policy clarifies who is authorized to speak on behalf of the University and reinforces employees' rights regarding free expression, academic freedom, and political activities. The policy also imposes potential disciplinary action and penalties for University employees and students who violate policy requirements.



University of Louisville

OFFICIAL UNIVERSITY ADMINISTRATIVE POLICY

POLICY NAME

Viewpoint Neutrality

EFFECTIVE DATE

June 26, 2025

POLICY APPLICABILITY

This policy applies to all members of the University community, including but not limited to members of the Board of Trustees, administrators, faculty, staff, and students.

POLICY STATEMENT

As provided in Section 2.5.1 of the University Redbook, The University of Louisville Board of Trustees affirms the belief that “Membership in the academic community imposes on students, faculty, staff, administrators, and trustees of the University an obligation to adhere to standards of academic honesty, to respect the dignity of others, to acknowledge their right to express differing opinions, and to foster and defend intellectual honesty, freedom of inquiry and instruction, and free expression both on and off the campus.” (UofL Redbook Sec. 2.5.1)

The University of Louisville does not discriminate on the basis of an individual’s political or social viewpoint. Moreover, the University supports and promotes intellectual diversity within the University. No individual shall be required to endorse or condemn a specific ideology, political viewpoint, or social viewpoint to be eligible for hiring, contract renewal, tenure, promotion, admission, or graduation.

Members of the University community will not require any individual to support, condone, or condemn a specific ideology or viewpoint as a condition or factor of admission hiring, promotion, contract renewal, appointment, tenure award, or graduation. The University specifically prohibits discrimination on the basis of an individual’s political or social viewpoint and/or the application of any ideological or political litmus test in student admissions decisions, employment decisions, promotion decisions, academic evaluations, appointment considerations, or degree conferrals.

Authority for Official University Statements and Positions

Official University Statements

Only the President has the authority and responsibility to issue Official Statements and communicate official positions on behalf of the University. The President may designate this authority in writing to specific individuals for narrowly defined purposes, occasions, and circumstances. All Official Statements and Positions must adhere to University neutrality standards and shall be expressly limited to matters directly related to the University’s mission, operational objectives, or legal obligations.

Board of Trustees Statements and Communications

The Chair of the University of Louisville Board of Trustees has the sole authority and responsibility to speak and/or issue statements on behalf of the Board of Trustees. The Board and the Board Chair shall adhere to the principle of Institutional Neutrality and shall not make any Official University Statement on political, social, or cultural matters that are not directly related to the University’s mission, operational objectives, or legal obligations.

University Constituency Groups

Nothing in this policy shall be construed to constrict the ability of the Student Government Association, the Staff Senate, and the Faculty Senate, as core University stakeholders and essential participants in shared governance, to pass resolutions or otherwise represent their constituencies as long as they communicate that they are speaking for their specific constituency group and not on behalf of the University.

Free Speech and Personal Expression

Nothing in this policy is intended to impede the members of the University community in the exercise of their rights to free speech and the provisions of this policy should be interpreted consistent with the Campus Free Speech Protection Act, KRS 164.348, particularly as it relates to the rights of students. Subject to the guidelines of this policy, members of the University community have the freedom to participate in public service, political activity, and advocacy work in their private time and in their individual capacity.

Any expression made by a member of the University community as a private individual shall not give the impression of or purport to represent the University or any of its schools, units, departments, or affiliated organizations. Members of the University community shall observe the following guidelines in any public expression of their views as a private individual:

1. University e-mail accounts, social media accounts, or web addresses will not be used when issuing statements in a private capacity.
2. The University marks, logos, name, or associated images will not accompany private messages.
3. University web sites, signature lines, stationary, e-mail accounts, social media accounts, or web addresses shall not reference a private site, account, initiative, organization, or logo.
4. University logos, backdrops, signature lines, or stationary shall not be used for statements made in a private capacity.
5. When speaking at professional or academic meeting or conference, members of the University community shall clearly note that they are speaking in an individual capacity and do not represent the University.

Political Activity

While the University of Louisville fully respects the right and responsibility of University faculty, staff, and administrators to engage as private citizens in the political process on the local, state, and national level, the University prohibits the use of University resources or property to support or oppose a particular candidate or ballot initiative.

Examples of Impermissible use of University resources or property include, but are not limited to:

- Engaging in political activities on University property during regular University business hours or at official, University-sponsored events
- Engaging in political activity in an official capacity or when conducting instructional responsibilities
- Sending campaign correspondence using University stationary, computer, or electronic mail systems
- Using a University e-mail distribution list to campaign for or against a particular candidate, political party, or ballot initiative
- Using University equipment to create, copy, or distribute material to support or oppose a particular candidate, political party, or ballot initiative
- Using a University office, building, telephone, computer, e-mail address, web-conferencing service account, or meeting space to support or oppose a particular candidate, political party, or ballot initiative
- Unless specifically authorized by the University President, giving the appearance of speaking or campaigning on behalf of the University when supporting or opposing a particular political candidate, political party, or ballot initiative.

Academic Freedom

This policy upholds and respects the University's commitment to academic freedom. Nothing in this policy shall be construed to constrict academic inquiry, classroom discussion, academic research, or academic debate within an appropriate educational or instructional context.

This policy shall be published in the University REDBOOK, student handbook, and faculty handbook and shall also be displayed on a prominent, publicly accessible page of the University's website.

REMEDIES AND ENFORCEMENT

Allegations of non-compliance with this Policy should be submitted to the University's Integrity and Compliance Office for appropriate routing and review.

Persons found to have violated the provisions set forth in this policy will be subject to disciplinary action and penalties as set forth in applicable University of Louisville Policies, including University HR Policies, the Faculty Accountability Policy, and the Code of Student Conduct. These penalties may include, but are not limited to, suspension, demotion, termination, or in the case of students, dismissal.

RELATED INFORMATION

[KRS 164.2896](#)

[The Redbook, Section 2.5.1](#)

DEFINITIONS

Institutional Neutrality

The University's commitment to refrain from taking an official position on political, cultural, or social matters that are not directly related to the University's mission, operational objectives, or legal obligations.

Official University Statement or Position

Any formal press release, resolution, social medial post, e-mail message, or public communication issued on behalf of the University of Louisville that purports to or gives the impression of representing the University or its Board of Trustees on any matter.

Political Activity

Supporting or opposing any partisan political party, candidate, ballot initiative, or activity. This definition includes campaign activity in favor of any candidate for local, state, or national

office, including oneself. For purposes of this policy, this definition shall not include promoting or opposing a candidate for Student Government, Faculty Senate, Staff Senate, or the University Board of Trustees. This definition shall not include activities authorized and initiated by the Office for External Relations.

University Property

Any real or personal property owned in which the University has a legal interest; any property, leased, or in any way controlled by the University.

University Resources

Any tangible or intangible University property, including, but not limited to, equipment, materials, supplies, devices, printers, copiers, software, licensing agreements, or human resources.

ADMINISTRATIVE AUTHORITY

Vice President for Risk, Audit, and Compliance

RESPONSIBLE UNIVERSITY DEPARTMENT/DIVISION

University Integrity and Compliance Office

215 Central Avenue, Suite 205

Phone: 502.852.5709

compliance@louisville.edu

HISTORY

This policy was approved by the Board of Trustees on June 26, 2025. Revisions to this policy were approved by the Board of Trustees on October 23, 2025.

Revision Date(s): October 23, 2025

Reviewed Date(s):

The University Policy and Procedure Library is updated regularly. In order to ensure a printed copy of this document is current, please access it online at <http://louisville.edu/policies>.