Table of Contents

• Athletics Compliance Structure
• Compliance Oversight Committee Overview
• Review of Major Infractions Cases
• Internal and External Audits
• Our Controls
Executive Director of Compliance
- Oversight of all daily operations
- Lead investigator on rules violations and reporting

Director of Compliance (Focus: Institutional Policies)
- Playing and practice season monitoring and education, tracking student-athlete participation, drug-testing, complimentary tickets, camps and clinics

Director of Compliance (Focus: Eligibility and Benefits)
- Oversight of admissions/eligibility/certification

Director of Compliance (Focus: Recruiting)
- Oversight of recruiting process, telephone call monitoring system, recruiting expenses

Director of Compliance (Focus: Education and Legislation)
- Systems coordinator and oversight of compliance manual, rules education

Director of Initial Eligibility and Admissions
- Coordinate of admissions process, oversight of all NCAA Clearinghouse Issues

Director of Scholarships and Financial Aid
- Oversight of financial aid, tracking of student-athlete housing

Graduate Assistants/Interns
- Monitor social networking websites/recruiting websites, assist in monitoring complimentary admissions, assist in a variety of tasks
• Members:
  ◦ Executive Director of Compliance
  ◦ Vice President/General Council
  ◦ Director of Athletics/VP for Intercollegiate Athletics
  ◦ Faculty Athletics Representative

• Duties/Responsibilities
  ◦ Meet on a monthly basis to discuss various compliance-related issues
  ◦ Provide an objective perspective of compliance initiatives
  ◦ Assist in maintaining the standards and integrity of the Department and institution
  ◦ Take part in review of secondary violations
  ◦ Assist in investigations of major infractions
University of Richmond
University of Oklahoma
University of Memphis
Florida State University
University of Michigan
Texas A & M University, Corpus Christi

Major Infraction Cases
Violation:
- Transmission of impermissible recruiting text messages and telephone calls to prospects
- Failure to monitor

Summary:
- Violations of NCAA legislation involving men’s basketball, women’s basketball, baseball, football, women’s golf, women’s lacrosse, women’s soccer, women’s track & field
- Failure to promote an atmosphere of compliance
- Recruiting violations
- Failure to monitor
Penalty:
- Additional penalties imposed by committee
  - Public Reprimand & censure
  - Two years probation
  - Required annual compliance reports

Preventative Measures – University of Oklahoma:

**Impermissible Calls:**
- Coaches track calls in ACS
- Reviewed weekly & weekly
- Phone records compared
- Monthly affidavits

**Impermissible Text Messages:**
- Monthly spreadsheet comparison
- Monthly affidavits
Oklahoma Employment Case
Violation:
- Impermissible extra benefits, payment for work not performed
- Failure to monitor

Summary:
- Payments were provided to three football students for work not performed at an automobile dealership and failure to monitor employment at the dealership
Penalty:
- Public reprimand and censure
- 2 additional years probation (expire May 23, 2010)
- Permanently dismiss student-athletes from team
- Cannot re-award or re-allocate financial aid 06-07
- Vacate wins
- Disassociate from dealership (until August 21, 2011)
- Reduce number of football coaches who can recruit off campus
Preventative Measures (implemented following violation):

- Rules education sessions and educational e-mail messages
- Employment disclosure documents (Fall & Summer)
- Agent, Vehicle, Employment Affidavit Form
- ACS → Cross-check against the employment database
- Employment Monitoring Form & Gross Earnings Form
  - All employment forms are stored in ACS by student-athlete.
- Employment contacts for introductory purposes
- Multiple spot checks at businesses

University of Oklahoma Employment
Violation:
  o Provided multiple extra benefits ($3,115.70)
  o Impermissible recruiting inducements to prospect
  o Impermissible meals
  o Impermissible contact

Summary:
  o Knowing involved with providing extra benefits to student-athletes & prospective student-athlete
  o Provided false & misleading information to the institution and knowledge of possible NCAA violations
  o Refused to furnish information relevant to investigation requested by the NCAA enforcement staff
Penalty:
- Public reprimand and censure
- Three (3) years of probation
- Vacation of all wins (men's basketball and women's golf)
- “Show-cause” for a period of five (5) years
- Compliance review & annual compliance reports during its probation term
Preventative Measures – University of Oklahoma:

- Rules education
- Compliance & Business Office review travel manifests
- All-access passes and/or credentials distributed are reviewed
- Financial Aid office & Compliance review all prospective student-athletes’ transcripts
- Analyze standardized test scores
Violation:
- Academic fraud to numerous student-athletes representing multiple sport programs
- Impermissible benefits and a failure to monitor by the institution

Summary:
- University Athletics Academic Support Services staff members gave improper assistance resulting in academic fraud to numerous student-athletes representing multiple sport programs
Penalty:

- Reprimand and censure
- Four (4) years of probation and annual compliance reporting
- Limits in the number of grants-in-aid in FTB, MBB, WBB, MSW, WSW, MTK, WTK, MBA, WSB, MGO
- Vacation of all records in which the
- Four (4) year show-cause for former learning specialist
- Three (3) year a show-cause for former tutor for a
- Five (5) year show-cause for former academic advisor
Preventative Measures – University of Oklahoma:

- **Online Protocol:** No Academic Support staff member are permitted in computer lab/academic centers during online class

- **General Practice:** Academic support for online classes is limited to those with a diagnosed learning disability

- Provide rules education - Academic Services Staff

- Academic Services Staff required provide an affidavit

- Student-athletes enroll in an online course sign an affidavit

- Department monitors online grade

**Florida State University**

Impermissible Benefits - Academics
Violation:
- Exceeded the permissible limit on the number of coaches, by quality control coaches engaging in on-and off-field coaching activities.
- Violated NCAA legislation governing playing and practice season when football staff monitored and conducted voluntary summer workouts, disciplinary conditioning activities and exceeded limits on countable activities

Summary:
- Violation of permissible coaches and improper usage of quality control coaches
- Violation of playing and practice season regulations
- Provided false and misleading information
- Failure to monitor

University of Michigan
Playing & Practice Seasons
Penalty:
- Still under review
Preventative Measures – University of Oklahoma:

**Practice Logs:**
- Hours tracked by student-athletes
- Practice logs are reviewed weekly by student-athletes
- Signatures are obtained in confidentiality
- Able to track those completed or not completed

**Number of Countable Coaches:**
- Countable coaches poster posted in locker room to id coaches that can coach
- Spot checks are performed to monitor coaches on field
- Educational sessions are conducted with student-athletes and coaches
Violation:
- Governing Ineligible Competition
- Financial Aid
- Eligibility
- Extra Benefits
- Impermissible Telephone Contacts
- Recruiting Inducements
- Unethical Conduct and Lack of Institutional Control

Texas A & M University, Corpus Christi
Eligibility
Summary:
- Two international student-athletes and an international prospect in men's basketball who were involved NCAA violations (ineligible participation & receipt of recruiting inducements)
- Unrelated recruiting violations in the men's basketball program resulting from impermissible telephone calls.
- Serious violations were committed by institutional personnel.
- Failure to report violations contributed to a lack of institutional control finding and unethical conduct findings.
Penalty:
- Public reprimand and censure
- Four (4) years of probation
- Limiting the number of grants-in-aid
- Postseason ban in women's volleyball
- Postseason ban in the men's tennis
- Vacation of wins
- Prohibit off-campus contact first week
- Annual compliance reporting

Texas A & M University, Corpus Christi
Eligibility
Preventative Measures – University of Oklahoma:

- Certification by certifying officer
- Forms following competition (meals, travel & participation)
- Student-athletes who receive financial aid are certified by NCAA Eligibility Center
- Track all calls via the ACS & review weekly
- Coaches sign an affidavits monthly
- Education sessions
- Student-athletes required to live in the dorms 1st year
• Contributes to University’s overall goal of a “state of the art” compliance operation capable of maintaining institutional control
• An internal and/or external audit once per year during the remaining period of probation

Role of Audit
• The University’s internal audit division conducts an audit of the Department each year

• Most recently during summer 2009
  ◦ The scope of the audit covered compliance with NCAA bylaws governing student-athlete financial aid during the 2008-09 academic year
  ◦ All recommendations made by internal audit following the completion of the audit were incorporated into the Department’s procedures
• Bond, Schoeneck & King, PLLC
  ◦ Performing a comprehensive audit of 21 different compliance-related areas over 5 years
  ◦ Began in spring 2009 with a review of:
    • Coaching Limitations
    • Recruiting
    • Academic Support of Student-Athletes
  ◦ Additional areas will be reviewed including:
    • Awards, complimentary admissions, camps and clinics, and playing and practice seasons
  ◦ At the conclusion of each area audit, a written report is provided, and recommendations are addressed by Athletic Department
<table>
<thead>
<tr>
<th>Item #</th>
<th>Specific Audit Area</th>
<th>Article References (not all inclusive)</th>
<th>2008-2009</th>
<th>2009-2010</th>
<th>2010-2011</th>
<th>2011-2012</th>
<th>2012-2013</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Rules Education Program</td>
<td>Articles 2.1, 2.8.1 &amp; 22.2.1.2</td>
<td></td>
<td></td>
<td></td>
<td>OUIA</td>
<td></td>
</tr>
<tr>
<td>2</td>
<td>Representatives of Athletics Interests</td>
<td>Articles 6 &amp; 13</td>
<td></td>
<td></td>
<td>OUIA</td>
<td></td>
<td></td>
</tr>
<tr>
<td>3</td>
<td>Gambling</td>
<td>Article 10.3</td>
<td></td>
<td></td>
<td></td>
<td>BS&amp;K</td>
<td></td>
</tr>
<tr>
<td>4</td>
<td>Coaches &amp; Staff Limitations</td>
<td>Article 11</td>
<td>BS&amp;K - completed</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>5</td>
<td>Amateurism</td>
<td>Article 12</td>
<td></td>
<td></td>
<td>OUIA</td>
<td>BS&amp;K</td>
<td></td>
</tr>
<tr>
<td>6</td>
<td>SA Employment</td>
<td>Article 12</td>
<td>BS&amp;K</td>
<td></td>
<td></td>
<td>OUIA</td>
<td></td>
</tr>
<tr>
<td>7</td>
<td>Agents</td>
<td>Article 12.3</td>
<td>OUIA</td>
<td></td>
<td>BS&amp;K</td>
<td></td>
<td></td>
</tr>
<tr>
<td>8</td>
<td>Recruiting</td>
<td>Article 13</td>
<td>BS&amp;K</td>
<td></td>
<td>OUIA</td>
<td>BS&amp;K</td>
<td></td>
</tr>
<tr>
<td>9</td>
<td>Sports Camps &amp; Clinics</td>
<td>Article 13</td>
<td>BS&amp;K</td>
<td></td>
<td></td>
<td>OUIA</td>
<td></td>
</tr>
<tr>
<td>10</td>
<td>Eligibility</td>
<td>Article 14</td>
<td>BS&amp;K</td>
<td></td>
<td>OUIA</td>
<td>BS&amp;K</td>
<td></td>
</tr>
<tr>
<td>11</td>
<td>Financial Aid</td>
<td>Article 15</td>
<td>OUIA</td>
<td>BS&amp;K</td>
<td></td>
<td>BS&amp;K</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Awards &amp; Benefits:</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>12</td>
<td>Equipment and Apparel</td>
<td>Articles 12, 13 &amp; 16</td>
<td></td>
<td></td>
<td>BS&amp;K</td>
<td></td>
<td>OUIA</td>
</tr>
<tr>
<td>13</td>
<td>SA Vehicles</td>
<td>Articles 13.5 &amp; 16</td>
<td></td>
<td></td>
<td>OUIA</td>
<td></td>
<td></td>
</tr>
<tr>
<td>14</td>
<td>Awards</td>
<td>Article 16.1</td>
<td>BS&amp;K</td>
<td></td>
<td></td>
<td>BS&amp;K</td>
<td></td>
</tr>
<tr>
<td>15</td>
<td>Complimentary Admissions</td>
<td>Article 16.2</td>
<td></td>
<td></td>
<td>BS&amp;K</td>
<td></td>
<td>OUIA</td>
</tr>
<tr>
<td>16</td>
<td>SA Academic Support</td>
<td>Article 16.3</td>
<td></td>
<td>BS&amp;K - completed</td>
<td></td>
<td>OUIA</td>
<td></td>
</tr>
<tr>
<td>17</td>
<td>Per Diem &amp; Meals</td>
<td>Article 16.5</td>
<td></td>
<td></td>
<td>OUIA</td>
<td>BS&amp;K</td>
<td></td>
</tr>
<tr>
<td>18</td>
<td>Team Travel</td>
<td>Articles 16.8 &amp; 16.9</td>
<td></td>
<td></td>
<td>OUIA</td>
<td>BS&amp;K</td>
<td></td>
</tr>
<tr>
<td>19</td>
<td>Playing &amp; Practice Seasons</td>
<td>Article 17</td>
<td></td>
<td>BS&amp;K - completed</td>
<td></td>
<td>OUIA</td>
<td>BS&amp;K</td>
</tr>
<tr>
<td>20</td>
<td>Championships &amp; Postseason FB</td>
<td>Article 18</td>
<td></td>
<td></td>
<td></td>
<td>OUIA</td>
<td></td>
</tr>
<tr>
<td>21</td>
<td>Certification</td>
<td>Article 22</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>OUIA</td>
</tr>
</tbody>
</table>
Our Controls

- Innovative ways to establish control
  - ACS Athletics
    - Centralizes document and information management all on one system
  - Rules Education
    - Programs in place to reach student-athletes, coaches, boosters, alumni, parents etc.
    - Include newsletters, meetings, clinics etc.
  - Rules Interpretation Database
    - Database to track all NCAA rules interpretations the Department provides
    - Creates a more efficient method for obtaining information
• Monitoring
  ◦ Periodic spot checks of games/events/practices for all sport programs
  ◦ Periodic spot checks of employers of student-athletes
  ◦ Review of ACS forms throughout the year
  ◦ Maintain agent/advisor database