

## **V. Compliance**

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## A. ADMISSIONS

In accordance with NCAA rules, all student-athletes must be admitted as regularly enrolled, degree-seeking students in accordance with the regular, published entrance requirements of The Pennsylvania State University.

Policy on Communication with The Undergraduate Admissions Office and The Graduate School

In accordance with the Big Ten Conference Standards for Safeguarding Institutional Governance of Intercollegiate Athletics and The Pennsylvania State University's established liaison communication model, all communication between coaches and sport specific staff and The Undergraduate Admissions Office shall be channeled through identified liaisons.

### **Policy on Monitor Intercollegiate Athletics Reserved Space Use**

#### **Introduction**

Reserved Spaces are admissions spaces reserved at University Park for eligible first-year students and transfer students who have completed less than two full academic years (four full time semesters) at another college/university, with special needs or talents that cannot be met at Commonwealth Campus locations. These students meet University admissions requirements, but their evaluation indices (EI) do not meet applicable University Park criteria. These students contribute to the educational and cultural life and diversity of the University Park campus.

#### **Process**

Intercollegiate Athletics (ICA) staff triggers the use of a Reserved Space by submitting the "Change of Assignment" form to the Athletics Compliance Office (ACO). A "Change of Assignment" may only be used on applicants who will be ICA student-athletes. **Using a "Change of Assignment" on managers, friends, relatives, or any applicant not targeted to be an ICA student-athlete is prohibited.** Once a Reserved Space is used on an applicant, it cannot be reallocated or recouped.

#### **Monitoring Process**

The ACO will review Reserved Space use through the following steps:

1. ACO staff will educate ICA staff about Reserved Spaces, Change of Assignment expectations, and the process to change an applicant's campus assignment.
2. ACO staff will track ICA use of Reserved Spaces via an internal system.
3. Prior to the beginning of each traditional admit term (i.e., fall or spring semester), ACO staff will review the roster status of students who needed a Reserved Space.
4. Reserved Space usage by sport will be shared with ICA Leadership and Sport Administrators for review on an annual basis.
5. ACO staff will review roster transactions of Reserved Space students and will review and document the circumstances regarding any departures (e.g., quit, dismissal) from the varsity team.

## **B. AGENTS**

The Athletics Compliance Office manages an agent programming applicable to all sports. The components of the program are as follows:

1. Registration – Any agent wishing to contact a current PSU student-athlete shall first complete a PSU agent registration program application and submit it to the ACO. The ACO staff will review the application for red flags and verify that the agent is current with any professional league certifications and is also registered with the State of Pennsylvania.
2. Education – At least annually, the ACO staff will educate all student-athletes on agent related issues, including, but not limited to the PSU agent registration program, NCAA rules and PA State regulations. Also, annual education will be provided to coaches through the coach rules education program. Finally, all agents who register with PSU will receive an overview of NCAA rules with their PSU registration confirmation.

## **C. BOOSTER GROUPS**

Penn State Intercollegiate Athletics has established the following guidelines for the operation of existing and newly formed Intercollegiate Athletics support groups

1. Purpose
  - a. All Intercollegiate Athletics support groups must have as their primary purpose promoting and encouraging fan support at home and away contests.
  - b. Support groups may engage in the following activities in furtherance of their above-described purpose:
    - (i) Recognition banquets for student-athletes and coaches in accordance with NCAA Bylaw 16.1.6.1.
    - (ii) Club social and promotional activities (e.g. pre-game and post-game socials).
    - (iii) Trips to away games and away events.
    - (iv) Organization and funding of alumni games or events.
    - (v) Publication of club newsletters.
    - (vi) Provision of support for foreign tours and special projects approved by the Director of Intercollegiate Athletics.
    - (vii) Provision of funds for outside competition as that term is defined under NCAA Bylaws 14.6.3.1 and 16.8.1.
    - (viii) Production and sale of club novelty items (e.g. t-shirts, hats, etc.).

- (ix) Organization of and conducting charity golf outings.
- c. The activities of members shall further the purpose of the organization, and must not result in personal profit or gain to a member. In addition, none of the activities shall result in the provision of extra benefits to student-athletes or the friends or relatives of student-athletes as provided in NCAA Bylaw 16.02.3.

2. Approval

- a. Support groups that represent the University's athletics interests are required to adhere to the policy and procedures established by the University for the governance of its Intercollegiate Athletics program.

As required under NCAA guidelines, an organization will be permitted to become an NCAA recognized University support group only with approval of the Director of Intercollegiate Athletics. Approval will be granted only upon demonstrated compliance with these guidelines. To apply for approval, the support group must submit the following information to the Director of Athletics or his/her designee:

- (i) A copy of the organization's constitution, bylaws, and/or similar documents relating to the structure and function of the organization.

**Administrative Policies – Support For Groups - Continued**

- (ii) A list of the current officers of the organization.
- (iii) A list of all accounts off campus with account numbers and cosigners.
- (iv) An agreement providing that the organization:
  - (a) Will operate in accordance with the allowable purpose of a support group.
  - (b) Will accept responsibility for compliance with NCAA, Conference, University, and other applicable policies relating to the activities of the organization.
  - (c) Will provide other information as may be requested by the Director of

Athletics.

- b. In the event the support group receives approval, the functions and activities of the organization and members must comply with these guidelines. In addition, the support group must submit to the Director of Intercollegiate Athletics or his/her designee, on or before August 15 of each year, the following information:

- (i) An updated and current list of names and addresses of officers of the group.

- (ii) A report of the activities of the group for the prior year.
- (iii) A financial report in accordance with the NCAA financial audit requirements.
- c. Failure by the organization or members to comply with these guidelines or to submit the above information on an annual basis may result in revocation of approval.

### 3. Official Recognition Privileges

Official recognition and approval as a University athletic support group entitles the organization to the following privileges:

- a. The use of the name of the University as a part of its own name.
- b. The use of University properties and services, in accordance with regular NCAA, Conference, and University regulations for such use.

### 4. Organizational Format

The group's enabling documents must include the following requirements:

- a. The organization shall be managed by a duly constituted governing body and officers.
- b. In the event of dissolution, any assets held in the name of the organization shall be distributed to the University.
- c. The Director of Intercollegiate Athletics or his/her designee (typically, the coach of the sport) shall be an ex-officio voting member of the support group's governing body. This individual also shall be a member of any committee empowered to act on behalf of the governing body or organization.

The operations and activities of the support group must be in accordance with the organization's constitution, bylaws, or other enabling documents.

All activities and expenditures of the support group shall be approved, in advance, by the Director of Athletics or his/her designee who shall, in conjunction with the head coach of the sport, ensure compliance with NCAA, Conference, and University regulations. Approval shall be obtained through the submission by the support group of an official University approval form.

## **Administrative Policies – Support For Groups - Continued**

### 5. Financial

It is recognized that an athletic support group must raise funds to provide for the financial well-being of its operation. Funds may be raised only through the collection of dues on a yearly basis. Dues may not exceed \$50.00 per member per year and lifetime memberships are not permitted, except for those groups which have: (1) had dues in excess of \$50 per member per year and (2) been offering lifetime memberships, both for at least three (3) years prior to the effective date of this policy. Dues are not deductible for federal income tax purposes.

Any other fund-raising campaigns or solicitations shall be approved, in advance, by the Director of Intercollegiate Athletics or his/her designee. This is necessary to coordinate all such activities with the overall University and Intercollegiate Athletics fund-raising efforts that may be taking place concurrently.

All financial activities of the athletic support group shall be conducted in accordance with prudent business practices, generally accepted accounting principles and all NCAA, Conference, and University policies that apply to such organizations. Financial activities and records are subject to an annual financial audit conducted by the institution and/or an outside auditor, selected by the University's Corporate Controller. (NCAA Bylaw 6.2.3) The time of such audits shall be at the discretion of the Corporate Controller.

Financial commitments and expenditures shall follow the policies and the budgets approved by the governing body. The organization cannot be involved in a salary or stipend arrangement for personal services.

Purchases and expenditures that directly or indirectly benefit teams and/or student-athletes (e.g. banquet meals, awards, entertainment) shall be made through the Department of Intercollegiate Athletics. All such purchases and expenditures shall be processed by the University through a University purchase order and paid for with a University check or draft.

Support groups will be classified as either **Tier I or Tier II**, depending on their level of annual revenue. Tier I groups shall be defined as those groups averaging over \$30,000 per year in annual revenue over the course of the most recent three year rolling cycle and Tier II will be those clubs under that level. Regardless of tier, all financial transactions for each support group must be processed through a local bank account that is FDIC or FSLIC insured.

**For Tier II groups, countersignature of checks over \$250 by the Director of Intercollegiate Athletics or his/her designee is required.** If a federal identification number is needed to obtain a bank account, the support group must obtain its own number, separate from that of the University. (Note: Obtaining a federal identification number does not mean that the group is incorporated and/or tax exempt.)

**For Tier I groups,** countersignatures are not required on checks due to the volume of financial transactions inherent to the scope of their activities. However, these groups must provide monthly bank statements to the Athletics Compliance Office for all group accounts.

This information must include copies of imaged or cancelled checks for all payments made from club funds.

It is recommended that each group maintain its own liability insurance for its activities (to include alcohol liability coverage) and obtain fidelity coverage (bonding) for the treasurer and any other individual authorized to handle funds.

## 6. NCAA Rules and Regulations

The NCAA requires member institutions, such as The Pennsylvania State University, to be responsible for monitoring the acts of independent agencies and organizations promoting the institution's intercollegiate athletics programs. Intercollegiate Athletics is responsible for the acts of those organizations and their individual members under these rules and regulations.

In accordance with NCAA policies and regulations, all members of athletic support groups are classified as "representatives of the institution's athletic interests." Once a person is identified as an athletic representative, he/she retains that identity forever.

Athletic representatives are governed by the same NCAA, Conference, and University policies and regulations as those placed on the institution's athletic staff members. The "Penn State Guide for Athletic Representatives" has

### **Administrative Policies – Support For Groups - Continued**

been prepared by Intercollegiate Athletics to inform athletic representatives of pertinent NCAA, Conference, and University policies and regulations. The Director of Athletics or his/her designee shall work with the head coaches in disseminating material to athletic representatives to keep them informed of NCAA and University policies and regulations.

### **Revocation or Withholding of Privileges**

NCAA member institutions are required to notify Athletic Representatives of consequences regarding rules violations. Athletic Representatives found in violations of NCAA rules are subject to losing benefits and privileges received from the University.

Any individual who has engaged in conduct that is determined, either by the University, or the NCAA, to be a violation of any NCAA Legislation, rule or regulation, regardless of whether such violation results in the imposition of sanctions, **shall be subject to the revocation or with-holding of any athletically related benefit or privilege, received by that individual from the University.** Such benefit or privilege may include, without limitation, ticket privileges which may be withheld by the University for that period of time which the University, or NCAA deems appropriate. The revocation of ticket privileges may result in an individual being denied admittance to any University hosted athletic event.

## 7. Official Recognition Revocation



When an officially recognized support group fails to meet the requirements for approval set forth in Section 2 of this policy, or when there has been a violation of any aspect of this policy, the Director of Intercollegiate Athletics shall revoke approval of official recognition of the support group and shall inform the public that the support group is no longer officially recognized. Further, the revocation of approval shall result in the revocation of privileges set forth in Section 3 of this policy. The Director of Intercollegiate Athletics shall notify the support group officers in writing of the revocation.

#### **D. CERTIFICATION OF ELIGIBILITY**

Penn State's (PSU) process for certifying the eligibility of continuing student-athletes occurs prior to the start of each Fall and Spring semester. Final authority in the certification process lies with the staff of Penn State's Office of The University Registrar (OUR). The process of eligibility certification is coordinated by PSU's Athletics Compliance Office (ACO) and assisted by the staff of the Morgan Academic Center (MAC) as well as Penn State's Faculty Athletics Representative.

1. Team rosters are maintained by the ACO staff in both ARMS and LionPath throughout the year based on submission of roster addition / deletion forms from PSU coaches.
2. Using the roster data available in LionPath, the OUR staff sends eligibility spreadsheets to designated officials of each college / academic unit asking them to determine and record degree applicable credits for students entering their 5<sup>th</sup>, 7<sup>th</sup> and 9<sup>th</sup> semesters. The completed spreadsheet is then returned to the OUR staff and incorporated into their analysis of S/A compliance with percentage of degree requirements.
3. The OUR staff also reviews and verifies the eligibility of student-athletes with respect to GPA requirements, the 24 hour rule, academic standing, Big Ten Conference eligibility and initial eligibility status as needed each semester.
4. The Morgan Academic Center staff separately maintains an eligibility worksheet for each S/A and determines S/A compliance with the PSU standards, NCAA 6, 9 and 18 hour rules. This information is then reported to the OUR staff for review and a final determination of eligibility.
5. Eligibility meetings that include the FAR, Morgan Center leadership, Registrar's Office and Compliance staff are held at the beginning of each regular term. In these meetings, the eligibility status of each S/A is reviewed and officially certified only after all parties are in agreement that each S/A meets all NCAA, Big Ten Conference and PSU eligibility requirements. Final authority shall rest with the OUR staff.
6. The MAC staff is charged with communicating information related to ineligibility of S/A's to both the involved S/A(s) and coaching staff on a preliminary basis.
7. A Certified Eligibility List (CEL) is generated by ACO staff prior to the first date of competition in each semester. The CEL is reviewed and signed by the FAR, Registrar

and ACO and then distributed to the Big Ten Conference, head coaches and sport administrators. The CEL includes all student-athletes determined to be eligible for competition in a given sport. As an accompaniment to the CEL, the ACO staff prepares a cover memo listing all members of a team's active roster who were not certified as eligible to compete and the reason why they were not certified.

8. A squad list for each sport that reflects the team roster as of the first date of competition is generated by the ACO and reviewed / signed by the head coach prior to any competition.

## **E. FINANCIAL AID**

### Overview

In accordance with NCAA rules, the Office of Student Aid (OSA) maintains final authority of all forms of institutional financial aid, including athletics scholarships. Intercollegiate Athletics and the Athletics Compliance Office administer athletically related financial aid in cooperation with the Office of Student Aid.

### Liaison Model – Athletics Governance Standards

While coaches and staff within ICA are encouraged to interact directly with the OSA on selected topics, some topics may only be addressed with the OSA staff by the designated liaison or an Athletics Administrator on cooperation with the liaison. Topics appropriate for a coaching or sport specific staff member to address directly with the OSA include:

1. Estimation of financial aid packages for prospective students
2. Questions about the application of institutional or Federal financial aid rules
3. Coordination of a meeting between the OSA staff and a recruit / the recruits family

Topics considered to be inappropriate for a coaching or sport specific staff member to discuss directly with the OSA staff include:

1. Requests for the OSA to grant additional financial aid resources to a specific S/A
2. Provision of input on or to influence the institutional cost of attendance calculation
3. Requests for detailed financial information from a specific S/A's student account

### SAF Administration

Funding provided by the NCAA for the Student Assistance Fund is administered by the Athletics Compliance Office. Expenditures from the fund are to be used to assist students with expenses that are not covered by their grant-in-aid. Prohibited expenditures include salaries and benefits, capital improvements, or grant-in-aid components.

### Summer Aid

Athletic financial aid for summer classes is not guaranteed as a part of a student-athlete's grant-in-aid agreement. Student athletes who want to pursue financial assistance for the summer must meet with their Morgan Center academic adviser to request the aid, which then must be approved by the coach and appropriate sport administrator.

Summer financial aid will be awarded based on the equivalency of financial aid received in the prior academic year.

#### Study Abroad

Student athletes are encouraged to take advantage of study-abroad opportunities that may be available through their academic course of study at Penn State.

Financial assistance for study abroad experiences will be based on the student-athlete's grant-in-aid amount during the study abroad semester. Transportation expenses to and from the study abroad experience will be the responsibility of the student-athlete.

#### Cost of Attendance

The cost of attendance is determined for each student-athlete by the Office of Student Aid using appropriate federal methodology. Any changes to a student's cost of attendance is subject to policies of the Office of Student Aid.

## **F. HUMAN RESOURCES**

### **Coaching and Operations Staff Hires**

Prior to extending an offer of employment to new coaching staff and sport specific employees, a compliance background check will be conducted. The purpose of the compliance background check is to provide the involved coaching staff, sport administrator and the Human Resources staff with information specific on the candidate's compliance history and prevent the inadvertent hiring of a staff member who has not demonstrated the integrity, ethical behavior or compliance history expected by Penn State, the Big Ten Conference and the NCAA.

The compliance background checks will be conducted as follows:

1. The coach's sport administrator, coaching staff or the Human Resource staff will provide the Athletics Compliance Office (ACO) with the name(s) and resume(s) of the involved candidate(s).
2. An IAWP (Individual Associated With a Prospect) review will be conducted by the ACO staff for all non-coaching hires with sport-specific responsibilities in the sports of basketball or football.
3. The ACO staff submits the name(s) to the NCAA to conduct a search in their major infractions database that includes the names of individuals involved in a major infractions case who either have a current "show cause" against them for employment at any member institution or who have been "named" in a Level I or II infractions case.
4. The ACO staff will conduct a web search designed to determine if there is public information on a candidate's involvement in secondary violations, arrests, scandals or other controversial matters that would indicate a lack of character, key awareness item or integrity concern.
5. When the background check is completed the Associate Athletic Director for Compliance will share in writing the information obtained in the review with the individual(s) who requested the search for incorporation into the overall hiring decision.

### **Volunteer Coaches**

The following shall apply to the employment of all individuals hired into countable volunteer coaching positions:

1. The volunteer coach hiring process is triggered by the staff of the involved sport submitting Coaching Change Form to the ACO staff.
2. The ACO staff will verify that the proposed hire fits within the team's countable coach limits and issue to the volunteer 1) a volunteer coach information sheet / agreement and 2) a volunteer information resource that outlines the benefits and restrictions of the volunteer coaching position under NCAA rules.
3. In the first month of the volunteer coach's employment at Penn State, he or she is required to meet with the Compliance staff to complete a volunteer coach orientation program.
4. The volunteer coach is obligated to alert the Compliance staff to any changes to the information presented in his or her volunteer information sheet and to participate in ICA's outside athletically related income disclosure process.

#### **Disclosure of Outside Athletically Related Income**

All ICA staff members must participate in Penn State's athletically related outside income disclosure process as a condition of their ongoing employment and as required by NCAA rules. The disclosure program requires:

1. Prior approval must be obtained for outside athletically related income that exceeds \$2500 per event. The prior approval process is triggered when the involved coach or staff member submits the prior approval request form from the share drive to the Compliance staff. The request is then reviewed by the Compliance staff, sport administrator as appropriate and the AD. Approval / denial decisions are then communicated by the ACO staff to the requestor.
2. Annual disclosure of all athletically related outside income, regardless of amount or form, is required at the conclusion of each fiscal year. The ACO staff shall oversee distribution and receipt of disclosure forms to all ICA employees, including volunteer coaches, and aggregate all disclosures into a spreadsheet that will be shared with the Athletics Director or designee and the President for review.  
consistently high level of competition that does not compromise the integrity that has characterized the Penn State athletics program from its inception.

### **G. INVESTIGATION POLICY**

Intercollegiate Athletics (ICA) is committed to adhering to the highest standards of conduct, including the adherence to all Penn State University policies and procedures, ICA policies and procedures, BIG regulations and NCAA regulations. This policy is designed to provide consistency and transparency throughout the investigative process that begins after a good faith report of suspected wrongdoing has been made.

#### **Persons Affected:**

This policy covers all ICA employees and student-athletes at The Pennsylvania State University, University Park Campus.

#### **Policy:**

It is the policy of ICA to review all good faith reports of wrongful conduct to determine whether the conduct (1) is potentially contrary to any established PSU, ICA, B1G or NCAA policy, and (2) is sufficiently credible and specific so that the report may be investigated in a thorough manner. If criteria are met, a timely review of the reported suspected wrongdoing will be conducted within 60 days unless a Senior Level staff member from the Office of Ethics and Compliance or ICA determines that circumstances do not merit review. If the review takes longer than 60 days, the review record shall include documentation of the reasons exceeding the 60 day period.

### **Procedures for Providing Notice of Institutional Investigative Policy**

This policy shall be readily available to all Athletics staff members through inclusion in the Departmental policy manual and / or the Athletics Compliance Office web page.

### **Roles and Responsibilities**

#### **University President**

The University President shall review and approve this policy and shall be involved in the review of any infraction report related to a NCAA Level I or Level II violation as described below.

#### **The Director of Athletics**

The Director of Athletics is responsible for reinforcing the requirement for adherence to this policy with all ICA staff and student-athletes.

#### **Athletics Compliance Office**

Representatives of the Athletics Compliance Office (ACO), with the assistance of the Office of Ethics and Compliance (OEC) and where appropriate, in cooperation with Intercollegiate Athletics (ICA), will initiate all investigations associated with potential wrongful conduct in relation with B1G and NCAA regulations unless a conflict of interest has been identified. The ACO will also be responsible for all logistical matters associated with the investigative and reporting process, as necessary. The ACO shall have the flexibility to include relevant offices or individuals who have expertise in the investigative process (e.g., Office of Internal Audit, Information Technology).

#### **Office of Ethics and Compliance**

If a conflict of interest has been identified, The Office of Ethics and Compliance (OEC) will serve as point group for all investigative matters associated with wrongful conduct in relation with B1G and NCAA regulations. If no conflict of interest is identified, the OEC will serve in a consultant role to assist the ACO with the investigative process. The OEC shall have the flexibility to include relevant offices or individuals who have expertise in the investigative process (e.g., Office of Internal Audit, Information Technology).

### **Reporting a Violation or Potential Wrongdoing**

The institution has a proud history of self-detecting and reporting all NCAA violations. As such, it is the expectation that all individuals associated with ICA report any suspected wrongdoing to any the appropriate reporting outlet.

### **Investigative Resources**

- I. Big Ten Conference Self-Report of Violation Form
- II. NCAA Bylaw 10.1 Agreement

### III. Penn State University Confidentiality Agreement

### IV. Incident Intake Information Form

#### **Definitions:**

*Level I Violation: Severe Breach of Conduct:* A severe breach of conduct is one or more violations that seriously undermine or threaten the integrity of the NCAA Collegiate Model, as set forth in the constitution and bylaws, including any violation that provides or is intended to provide a substantial or extensive recruiting, competitive or other advantage, or a substantial or extensive impermissible benefit. Among other examples, the following, in appropriate circumstances, may constitute a severe breach of conduct:

- a. Lack of institutional control;
- b. Academic misconduct;
- c. Failure to cooperate in an NCAA enforcement investigation;
- d. Individual unethical or dishonest conduct, regardless of whether the underlying institutional violations are considered Level I;
- e. A Bylaw 11.1.1 violation by a head coach resulting from an underlying Level I violation by an individual within the sport program;
- f. Cash payments or other benefits provided by a coach, administrator or representative of the institution's athletics interests intended to secure, or which resulted in, enrollment of a prospective student-athlete;
- g. Third-party involvement in recruiting violations in which institutional officials knew or should have known about the involvement;
- h. Intentional violations or reckless indifference to the NCAA constitution and bylaws; or
- i. Collective Level II and/or Level III violations.

*Level II Violation: Significant Breach of Conduct:* A significant breach of conduct is one or more violations that provide or are intended to provide more than a minimal but less than a substantial or extensive recruiting, competitive or other advantage; include more than a minimal but less than a substantial or extensive impermissible benefit; or involve conduct that may compromise the integrity of the NCAA Collegiate Model as set forth in the constitution and bylaws. Among other examples, the following may constitute a significant breach of conduct:

- a. Violations that do not rise to the level of Level I violations or are more serious than Level III violations;
- b. Failure to monitor (such violations will be presumed Level II but may be deemed to be of a Level I nature if the failure to monitor is substantial or egregious);
- c. Systematic violations that do not amount to a lack of institutional control;
- d. Multiple recruiting, financial aid, or eligibility violations that do not amount to a lack of institutional control;
- e. A Bylaw 11.1.1 violation by the head coach resulting from an underlying Level II violation by an individual within the sport program; or
- f. Collective Level III Violations

*Level III Violation: Breach of Conduct:* A breach of conduct is one or more violations that are isolated or inadvertent in nature; provide no more than a minimal recruiting, competitive or other advantage; and

provide no more than a minimal impermissible benefit. Among other examples, the following may constitute a breach of conduct:

- a. Inadvertent violations that are isolated or limited in nature; or
- b. Extra-benefit, financial aid, academic eligibility and recruiting violations, provided they do not create more than minimal advantages.

### **Relevant University Polices**

AD67 – Disclosure of Wrongful Conduct and Protection from Retaliation

AD79 – Staff Grievance Procedure

AD88 – Code of Responsible Conduct

### **Methodologies Used During Review of Allegations Related to NCAA Rules Violations**

#### **Level I/II Violation Allegations**

Allegations of Level I/II violations will be initially reviewed by the ACO to determine credibility and specificity. Upon determination that the allegation meets thresholds for review, the ACO will contact the NCAA Enforcement Group and outside counsel to consult during allegation review. The NCAA Cooperative Principle will be adhered to.

#### **Level III Violation Allegations**

Allegations of Level III violations will be reviewed by the ACO to determine credibility and specificity. If, during the review, information is discovered that merits review of the facts as a Level I/II violation allegation, the ACO will contact outside counsel to consult.

#### **Cooperation During the Investigations Process**

All coaches and staff members involved in a review of potential NCAA or Big Ten Conference rules violations shall fully cooperate with the investigative process at all time. Cooperation includes, but is not limited to the following:

- a. Assisting the individuals performing the investigation to develop complete information about the matter being investigated;
- b. Providing complete and accurate information during investigative interviews;
- c. Disclosing information about any potential violations that the investigators may not be aware of or that fall outside of the current investigation;
- d. Providing access to all potential sources of information, including electronic devices used for business purposes, social media records used for business purposes and other relevant records (in accordance with University policy);
- e. Uphold the integrity of the investigation by fully complying with all stated confidentiality instructions; and
- f. Encouraging others, when permissible and appropriate, to cooperate with the investigative process and to provide only complete and accurate information.

#### **Report of Findings**

At the conclusion of the investigative process, any Level III violations identified will be reported to the NCAA via the NCAA's Requests and Self Reports Online (RSRO) portal. Level III violation reports will be shared with the head coach of the involved sport program (or applicable administrator if violation

involves a functional area / department), the involved individual (if different from the head coach / administrator), the supervisor of the sport / functional area, the Deputy AD for Administration and the Faculty Athletics Representative.

The results of any review that culminates in a finding of “no violation” will be summarized in writing via the ACO incident intake form and kept on file.