

UNIVERSITY OF NEBRASKA, OMAHA

Athletics Compliance Review February 2013

ATHLETICS COMPLIANCE REVIEW – UNIVERSITY OF NEBRASKA, OMAHA

February 25, 2013

This is a report of a winter 2013 athletics compliance review of the NCAA rules compliance program at the University of Nebraska, Omaha (UNO). The compliance review was conducted at the request of the National Collegiate Athletic Association (NCAA) Division I Membership Subcommittee, by the Collegiate Sports Practice Group of Bond, Schoeneck & King, PLLC (BS&K). The NCAA requested a thorough and critical review of the athletics compliance program at the University.

The objectives of this BS&K compliance review are: (1) to evaluate the institution's existing compliance and monitoring systems and procedures for the NCAA and provide recommendations to the University for enhancement of its athletics compliance program; (2) to fulfill the outside review requirement of NCAA membership legislation [NCAA Bylaw 22.2.1.2-(e)]; and (3) to assess the institution's commitment to compliance with NCAA and institutional regulations, a key element to institutional control.

The information upon which this report is based was provided by University officials through telephone conferences, submission of written materials and on-campus meetings. On-campus interviews and meetings with more than 25 individuals, including coaches, athletics administrative staff, student-athletes, representatives from academic offices on campus and the University Chancellor occurred over three days (January 29-31, 2013) and additional interviews were conducted via telephone. A more detailed description of the process of gathering information for this Report is included as **Appendix 1**.

The Report is presented in the following format:

- I. COMPLIANCE PROGRAM OVERVIEW
- II. SPECIFIC FINDINGS OF REVIEW
- III. RECOMMENDATIONS FOR SPECIFIC COMPONENTS OF THE COMPLIANCE PROGRAM
- IV. APPENDICES

In the interest of brevity, this review generally does not describe details of athletics compliance operations that are functioning appropriately. The recommendations for changes, improvements or additions made herein cover the entire spectrum, from issues of substantial importance to rather minor matters. Thus, the volume of recommendations in and of itself should not be viewed as an indicator of the quality of the current compliance program.

BS&K prepared this Report based on information provided by the University and its employees, agents and representatives related to the University's attempts to conform to and maintain compliance with NCAA rules and regulations. Any conclusions drawn or recommendations made by representatives of the firm are for the purposes of assisting the NCAA (and the University) in gaining clearer understanding of the University's athletics compliance systems and their likelihood of preventing/detecting NCAA rules infractions.

Any institutional decisions related to the implementation of the Report's recommendations at this stage of the process should involve the Chancellor; the Director of Athletics; the Associate Athletic Director, Leadership & Governance; the Director of Compliance; the Faculty Athletics Representative (FAR) and other University and athletics department administrators as necessary and should be reported to the appropriate NCAA officials. Prompt decisions and regularly scheduled post-review evaluations of progress are keys to successful implementation. Once the NCAA has completed its review, the institution should continue to consider utilizing any remaining recommendations to enhance its compliance program.

I. COMPLIANCE PROGRAM OVERVIEW

The intercollegiate athletics department of the University of Nebraska, Omaha (UNO) has a stated philosophy that, "It is essential that the University exhibits evidence of institutional control and commitment to enforcement of the NCAA rules." Additionally, the UNO athletics compliance office employs the philosophy that such an effort is a shared responsibility and that all units on the University's campus must work together to achieve this goal. Toward that end, UNO has established a number of individual systems and procedures designed to provide effective rules education for and monitoring of the activities of the University's intercollegiate athletics program. The athletics compliance office reports to the University's Director of Athletics.

Based on the interviews conducted and materials reviewed, it is apparent that the athletics compliance office of UNO has put an effective athletics compliance program in place. There appears to have been a successful effort to create a culture of compliance at the University as strongly advocated by the Chancellor and the Director of Athletics. The University has been proactive in identifying and responding to compliance issues. We found that there is good communication regarding rules-compliance matters between the UNO athletics department and other units on campus.

The University appears to be in position to continue to refine its athletics compliance program by adding additional operational systems that were not necessary as a Division II member and concentrating on the athletics department's infrastructure (e.g., academic support) as it moves toward its goal of full Division I membership.

Although there are substantive issues that were identified during the course of this review that must be resolved in order for the compliance program to operate more effectively, none of them individually is an indication of an ineffective athletics compliance program. In fact, based upon the information gleaned in this process, it appears that the athletics compliance program at UNO is functioning well.

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² UNO 2011-12 Athletics Compliance Manual

II. SPECIFIC FINDINGS OF REVIEW

The two areas of the findings presented in this section relate directly to measurable athletics compliance standards developed by the Division I Committee on Athletics Certification. The Committee developed these standards to clarify expectations for each operating principle and to bring more consistency to the external review process for institutions and the external reviewer.

The NCAA has indicated that these standards are important considerations to an objective compliance review. In each area, the Committee's standards are highlighted in blue boxes and the presence of a checkmark (\checkmark) indicates our conclusion that the basic elements of the Committee's standard are met. Conversely, the lack of a checkmark indicates our conclusion that the Committee's standard has not yet been fully satisfied.

- A. Measurable Standards for Operating Principle 1.1 Institutional Control, Presidential Authority and Shared Responsibilities
 - 1. "The institution's governing board's oversight and policy formulation for athletics must be consistent with its policies and responsibilities for other units of the institution."
 - ✓ The University's governing board provides oversight and policy formulation. According to the information obtained from senior central administration, intercollegiate athletics appears to be treated consistently with the policies and stated responsibilities of the other units of the institution.
 - 2. "The Chancellor must have clear and direct oversight of the athletics program."
 - ✓ The University's Chancellor exercises oversight and control of the intercollegiate athletics program. The Director of Athletics has a direct reporting line to the Chancellor, and the two appear to interact on a regular basis. The Director of Athletics also serves as a member of the Chancellor's Council. The University's Director of Compliance, the administrator with primary athletics compliance responsibilities, has the necessary access to both the Chancellor and the Director of Athletics. The field work conducted during the course of this review showed evidence that the Chancellor has clear and direct oversight of the athletics program. The Chancellor is involved in assisting with delivering the message that athletics compliance is a serious matter and that it is an institutional obligation.

The Chancellor is active in the institution's move toward full Division I membership and appreciates the University's long-standing success and membership in the Association.

- 3. "The institution should identify individuals or groups external to the athletics department that have meaningful input in formulation of policies and the periodic review of policy implementation."
 - ✓ The University has a University Athletic Committee composed primarily of UNO faculty and chaired by a faculty member. The stated charge for the Athletic

Committee is to serve in an advisory capacity to both the Chancellor and the Director of Athletics on athletics matters.

While the Athletic Committee does provide input in the formulation of some athletics compliance policies, we feel that this level of oversight can be enhanced. We believe this important group could better serve the University if it had a more clearly defined charge to assist with the University's institutional control efforts (e.g., coordination of annual compliance audit program, review of institutional violations).

- B. Measurable Standards for Operating Principle 1.2 Rules Compliance
 - "The institution must provide evidence that all individuals inside the athletics department who are involved or associated with athletics have statements regarding the importance of rules compliance in all of the following documents: contracts or letters of appointment, performance evaluations and job descriptions."
 - ✓ We reviewed job descriptions and contracts/letters of appointment and found that all individuals inside the athletics department who are involved or associated with intercollegiate athletics have statements regarding the importance of athletics compliance in contracts or letters of appointment, performance evaluations and job descriptions.

The expectations that the University has for its athletics department employees are well stated. All individuals within the athletics department who were interviewed during the course of this review expressed an awareness of the importance of compliance and that such expectations were provided to them annually in writing.

- 2. "The institution must provide evidence that all individuals outside the athletics department who are involved or associated with athletics have statements regarding the importance of rules compliance in all of the following documents: contracts or letters of appointment, performance evaluations and job descriptions."
 - ✓ Based on the interviews conducted during this review, evidence indicates that individuals outside the athletics department who are involved or associated with athletics have statements regarding the importance of compliance in contracts or letters of appointment, performance evaluations and job descriptions.

The expectations that the University has for its campus employees who assist athletics (e.g., financial aid, registrar) are well stated. Consistent with the finding above, the University has created detailed job descriptions that help to ensure that each individual outside of the athletics department has an understanding of the importance of athletics compliance.

"The institution must provide documentation that demonstrates that its entire rules compliance program has been subject to an external comprehensive review once every four years."

- ✓ This athletics compliance review initiated by the NCAA is not UNO's initial external comprehensive review of its rules-compliance program. The University enlisted the services of the Summit League staff to perform a similar review in December 2011. The results of that report appear to have helped UNO to assess its commitment to compliance with NCAA and institutional regulations, a key element to institutional control.
- 4. "The institution's comprehensive compliance review must be conducted by an individual(s) external to athletics who is knowledgeable of NCAA compliance and who does not have day-to-day responsibilities in the areas under review."
 - ✓ This athletics compliance review on behalf of the NCAA but also to assist the University was conducted by the Collegiate Sports Practice Group of Bond, Schoeneck & King, PLLC (BS&K) of Overland Park, Kansas. Christopher D. Schoemann, the firm's Director, NCAA Compliance Services, was primarily responsible for the review. Mr. Schoemann is knowledgeable of NCAA athletics compliance practices as a result of over 20 years experience working directly with NCAA rules and regulations, including having served as a member of the NCAA national office staff and as an athletics administrator, whose primary area of responsibility was athletics compliance, at an NCAA Division I Football Bowl Subdivision institution. Mr. Schoemann's work was overseen by Steve Morgan, a partner with the firm's Collegiate Sports Practice Group, who has 35 years experience in NCAA compliance and infractions matters.
- 5. "The comprehensive review must demonstrate that the rules-compliance program is engaged and functioning."
 - ✓ This review tested the athletics compliance systems and procedures in the following areas in four dimensions (communication, organization, documentation and evaluation) and offered enhancement recommendations.

Agents/Gambling/Amateurism Academic Support

Automobiles/Motor Vehicles

Awards/Extra Benefits

Booster Organizations

Camps/Clinics

Coaching Limitations/Outside

Income

Compliance Infrastructure Complimentary Admissions

Eligibility Certification

(Continuing/Initial/Transfer)

Employment of Student-Athletes

Equipment

Financial Aid

Investigations/Reporting Policies

and Procedures

Monitoring Systems/Forms

Participation

Playing and Practice Seasons

Promotional Activities

Recruiting

Rules Education

Student-Athlete Automobiles Student-Athlete Employment

Team Travel

These tests revealed a rules-compliance program that is engaged and functioning.

In addition to the findings above related to NCAA identified measurable operating standards, we also made the following "big picture" findings regarding the University's athletics compliance program.

✓ The Chancellor has assigned direct responsibility for rules compliance to the Director
of Athletics. In turn, the Director of Athletics has charged the Associate Athletic
Director, Leadership & Governance, and the Director of Compliance with the daily
administration of the program. Both administrators are conscientious in their
compliance roles and responsibilities.

From a staffing standpoint within the athletics compliance office, the level of human resources devoted to administering the athletics compliance program currently meets industry standards across non-football playing Division I institutions. However, we believe that the University would be well-served to examine whether to add an additional full-time administrative staff member to this effort as it continues to progress toward full Division I membership.

We were impressed by the current Director of Compliance and his focus on serving the needs of the University and the integrity of those services. During the course of the review, he demonstrated a comprehensive knowledge of NCAA regulations and their application to the University's athletics programs, and it appears that his technical skill and commitment meet the current needs for UNO.

✓ It appears that the University has identified the individuals who have compliance-related responsibilities and has established written reporting lines for those individuals. All University personnel interviewed as a part of this review (see **Appendix 1**) were able to immediately identify the Director of Compliance as the rules-compliance authority on campus. Based on the individuals interviewed in this review, the Director of Compliance has made himself visible and effective in accommodating the needs of various constituencies, both internal and external to athletics, at the University.

In the University's organizational structure, the office of athletics compliance reports to the Director of Athletics through the Associate Director of Athletics, Leadership & Governance. Although there is currently no formal outside reporting relationship to the office of the Chancellor, both the Chancellor and Director of Compliance appear to interact on a frequent basis. It is our experience and belief that an outside reporting relationship for the athletics compliance function is helpful in maintaining a successful athletics compliance program, encouraging objectivity and demonstrating institutional control. As an example, such a reporting relationship could manifest itself as a direct report to the Associate Director of Athletics and a dotted line reporting relationship to the Office of the Chancellor.

✓ The University has identified individuals external to the athletics department who are active participants in critical and sensitive areas of compliance (e.g., eligibility certification, investigation and self-reporting of rules violations, monitoring financial aid). These individuals are engaged in their individual and/or collective areas of athletics compliance responsibility and appear to understand their roles well. As with

any such review, there are areas where we believe that procedures could be tightened and/or roles and responsibilities could be more clearly articulated. Those areas are identified in the Recommendations section of this Report.

- ✓ The University has an ongoing educational program for all individuals and groups associated with the athletics program including boosters, institutional staff members, student-athletes and athletics department staff, which includes coaches. As with any such review, there are areas where we believe that the rules-education program could be enhanced. Those areas are identified in the Recommendations section of this Report.
- ✓ The University has written compliance policies and procedures and has made those available to athletics department staff via a Compliance Manual. This publication, while well done, can be enhanced to provide more specificity to UNO staff members with respect to roles and responsibilities as they relate to various compliance systems. The Recommendations section of this review identifies such areas.

III. RECOMMENDATIONS

This section sets forth, by compliance area, the recommendations for enhancement of athletics compliance program components associated with each specific area evaluated in this compliance review. The section is divided by each compliance topic area that was assessed. Each recommendation has a high level of importance; but generally, the recommendations are listed within each section in a descending order of significance.

Compliance Infrastructure

Recommendations

- 1. Examine ways to increase the oversight responsibilities of the University Athletics Committee. The identification and implementation of opportunities to make the Athletics Committee more engaged in the oversight of the athletics compliance program will enhance institutional control. Consideration should be given to having the Athletics Committee serve as the coordination entity for a compliance audit program. With such a structure, the Athletics Committee could identify the areas to be audited during upcoming years and receive reports from the University/outside auditor.
- 2. Consider the establishment of an outside reporting relationship for the Office of Athletics Compliance. Such an outside line (e.g., direct or "dotted" line reporting relationship to University Chancellor or Counsel) could greatly assist UNO, inasmuch as our experience has shown that an outside reporting line is beneficial in situations where the Athletics Compliance Office may be called upon to examine allegations of NCAA and/or conference rules violations and provides an element of impartiality to such a situation.
- 3. Enhance the working relationship between the athletics department, the offices of the Registrar, Admissions, and Financial Aid by creating a system of regular meetings or the creation of a "Compliance Team" to meet (e.g., monthly) on pertinent issues.

Monitoring Systems/Forms/Rules Education

Recommendations

- Enhance the active monitoring of existing athletics compliance systems. Currently, it
 appears that most instances of monitoring or reconciliation of compliance-related
 documentation that are received from UNO staff members occur in situations in which an
 allegation has been made regarding a specific NCAA or conference rule. A hallmark of
 a solid athletics compliance program is actively and regularly monitoring the compliancerelated data it collects.
- 2. Ensure the inclusion of individuals from all units within athletics, as well as other campus units that have athletics compliance-related responsibilities in the rules-education program. This program should be for all individuals not only coaches and administrators but also others who may be in situations where potential NCAA issues arise, including athletic trainers, ticket office staff, student managers (and other student workers), equipment managers and secretaries. To further enhance the educational

program, the University should consider the practice of having all individuals take the NCAA Coaches Certification Exam (or develop a similar tool for non-coaching staff members) on an annual basis.

- 3. Develop a written statement for all managers and student workers to read and sign annually that reflects that they have undergone training on applicable NCAA rules. Specifically, the managers and student workers should be affirming in writing that they have an understanding of situations involving the application of NCAA rules in which they may find themselves (e.g., extra benefits).
- 4. Hold end-of-spring-term rules-education meetings with each team to review applicable NCAA rules during the upcoming summer-vacation period (e.g., camp employment, athletics participation).
- 5. Establish a new-employee-orientation program that would incorporate the athletics compliance unit, as well as other units within the department (e.g., business, ticket office), and provide an overview of NCAA rules and regulations. This program should encompass all new staff, not just coaching staff members.

Academic Support

Recommendations

- 1. Ensure that all tutors annually read and sign a written statement that reflects that they have undergone training that included NCAA rules. Specifically, the tutors should be affirming in writing that they have an understanding of the application of NCAA rules to situations in which they may find themselves. Given recent infractions case precedent in this area, the University should pay careful attention to tutors and their relationships with student-athletes (e.g., complimentary tickets, preparation of student-athlete academic work, local transportation, occasional family home meals).
- 2. Evaluate the need for additional staffing in this area. Additional staffing would enhance the institution's ability to serve its student-athletes and help to ensure that all continuing eligibility standards are clearly communicated to student-athletes and coaches. The University currently has one academic advisor responsible for its entire student-athlete population and the level of human resources in this area lags behind industry standards across Division I.

Agents/Amateurism/Disability Insurance/Gambling

Agents

Recommendation

Provide a summary of NCAA legislation related to agents and amateurism as a part of the University's student-athlete compliance seminar information each fall. To date, this has not been an area of concern for the University; however, in preparation for its move to full Division I status, the University should bolster its athletics compliance procedures in this area.

Additionally, it is good practice to enlist the assistance of former student-athletes who have professional sports careers to assist in educating current student-athletes about "agent" related issues, including concerns about "runners" and "financial advisors."

Amateurism

Recommendation

Seek additional information on amateurism questions from student-athletes in the fall of each year to ensure that the certification of eligibility for each fall semester includes a review of fundamental amateurism issues for each student-athlete. Prevention and detection of specific types of problems or issues that arise in particular sports (e.g., track and field, golf) or for the international student-athlete population may not be adequately handled through use of the NCAA Eligibility Center as the primary means of gathering information from and disseminating information to student-athletes on amateurism. It has been our experience that a preliminary review of results and pertinent information on the student-athlete's sport or country (e.g., Internet search) reveals information that student-athletes typically do not disclose, but yet still needs to be evaluated in order to certify eligibility for competition.

Disability Insurance

The review revealed no cause for written recommendations in this area.

Gambling

Recommendation

Consider utilizing a representative from the Federal Bureau of Investigation and/or from local law enforcement each year to discuss the dangers of gambling, particularly with student-athletes in the sports of men's basketball and ice hockey, and stress that such presentations provide concrete and possibly local examples of gambling activity. Additionally, more commonplace examples of gambling should be included in the presentations on gambling for all sports to help student-athletes recognize the broad range of activities that can be considered gambling (e.g., betting in pools, Internet poker, "friendly" wagers).

Awards and Extra Benefits

Awards

Recommendation

Create a system for accurately monitoring all awards received by student-athletes (not just annual participation awards) and ensuring that the number and value of such awards comply with the applicable NCAA category. Further, all individuals involved in ordering and/or providing awards for student-athletes should be instructed concerning NCAA legislation limiting the value of those awards received by each individual.

Extra Benefits

Recommendation

Educate student athletic trainers, team managers and equipment managers about NCAA extrabenefit rules and have them annually sign a statement reflecting that they have undergone rules-education training and understand relevant NCAA rules.

Booster Organizations

The review revealed no cause for written recommendations in this area.

Camps & Clinics

The review revealed no cause for written recommendations in this area.

Coaching Limits/Outside Income Reporting

Recommendation

Assign responsibilities for monitoring compliance with NCAA legislation governing limits on the numbers, duties, and compensation of coaches, including volunteer, graduate assistant and undergraduate student-athlete coaches more clearly. Specifically: (a) the current declaration of coaching staff forms need to be expanded to provide for non-coaching (e.g., Director of Basketball Operations) personnel to be listed; and (b) the terminology used in athletics department media guides for coaching titles should be consistent with NCAA legislation governing coaching categories and limits.

Complimentary Admissions

Recommendations

- 1. Require recipients of complimentary admissions from student-athletes to identify a relationship for each recipient. Although no longer a requirement under applicable NCAA legislation, this designation can provide important information. Additionally, each recipient of a student-athlete or coaching staff member complimentary admission should be required to sign upon entrance to the facility.
- Identify recipients of complimentary admissions from UNO coaches (other than immediate family members) in the Athletic Director's office prior to submission to the ticket office. Recent infractions cases demonstrate that the expectation is that the University have knowledge of the recipients of these admissions from coaching staff members.

3. Give consideration to implementing an Internet-based ticket package for tracking student-athlete complimentary admissions as the University continues with its progression to full Division I membership. Such a system would create an accurate record of ticket transfers between student-athlete and facilitate the work of the ticket office.

Continuing, Initial and Transfer Eligibility Certification

Recommendations

- Set forth in writing, and in greater detail, the compliance oversight responsibilities for athletics eligibility certification of student-athletes. The written description of procedures for the certification of eligibility for continuing student-athletes should incorporate the method by which eligibility is certified and documented by the Office of the Registrar and the department of athletics.
 - a. All phases of the eligibility-certification system should be subject to random sample testing on an annual basis by an external compliance oversight group/individual external to athletics (e.g., outside auditor, University audit staff).
 - b. Each step in the process, from advising student-athletes to final certification of eligibility, should be evaluated annually to ensure that written procedures/forms:
 - i. accurately reflect current practice;
 - ii. take into account applicable NCAA, conference and University regulations;
 - iii. accurately document the decision-making process; and
 - iv. provide appropriate checks and balances.
- 2. Continue to provide rules education on both a formal (at least annual) basis and informal basis (dissemination of rules interpretations and other written materials) to all of the individuals on campus involved in certification of student-athlete eligibility.

Everyone involved in the certification process should be included in a meeting at least annually to ensure uniform application of the rules and proper training of new staff, as well as to fine-tune procedures and forms, identify and correct problems, and anticipate future changes. Consideration should be given to having college deans and associate deans, the FAR, and perhaps the Chancellor, attend this annual session.

Equipment

The review revealed no cause for written recommendations in this area.

Financial Aid

Recommendation

Charge a committee or individual external to the athletics department with overall external oversight of financial aid issues and/or systems. This should be either a financial aid office representative or the committee/individual selected to provide oversight of the entire compliance program. Currently the financial aid office role is limited to the supply of information to the athletics department, and the office does not perform any monitoring functions (concerning individual or team limits and, in fact, does not see NCAA Squad Lists). The external oversight duties assigned to this group or individual should include the following items: (i) a defined regularly scheduled random sampling to be audited to determine if the electronic reports are accurate; (ii) written prior approval of the full grant-in-aid and cost of attendance values to be utilized for the academic year; and (iii) monitoring of individual and team award limits per NCAA regulations.

In addition to the limited random testing done by the external oversight group or individual, the compliance and financial aid offices should design periodic systems tests that could be performed to ensure accuracy of information. Such testing measures might include reconciliation of the following information: payroll records of student-athletes with institutional data; campus-wide employment earnings with institutional data; bursar office data with institutional data; and review of fund code questions entered into computer system with published information of the financial aid office.

Investigations/Reporting Policies and Procedures

The review revealed no cause for written recommendations in this area.

Participation

The review revealed no cause for written recommendations in this area.

Playing and Practice Seasons

Recommendations

- 1. Student-athlete verification of athletically related activity logs should become a compliance office effort. Each term, an appropriate sample of student-athletes across all sports should be selected and assigned to review and verify athletically related activity logs for accuracy outside the presence of their coaching staffs (e.g., mail logs to student-athletes with envelope for return).
- 2. Continue to confirm with coaches the NCAA legislation and interpretations governing student-athlete participation in "voluntary" practice activities.

Promotional Activities

Recommendation

Develop a procedure to ensure that coaches and athletics administrators request approval for student-athletes' participation in institutional promotional activities in all cases.

Recruiting

Recommendation

Define the compliance oversight responsibility for the review of any financial transactions that occur in the recruiting process. Each recruiting transaction should be reviewed by both the athletics business and compliance offices in order to reconcile all of the information contained in the travel report, the receipts and the recruiting records. Additionally, the institution should require that coaching staff members turn in a contact/evaluation sheet subsequent to every recruiting trip for which they seek expense reimbursement. This is a standard element of a Division I athletics compliance program.

Student-Athlete Automobiles/Motor Vehicles

The review revealed no cause for written recommendations in this area.

Student-Athlete Employment

The review revealed no cause for written recommendations in this area.

Team Travel

Recommendation

Ensure that all personnel involved in making team travel arrangements are educated on applicable NCAA rules and regulations in this area.

Review Objectives and Scope

The primary methodologies used in the review were pre-campus visit surveys, in-person interviews conducted on the institution's campus and random test sampling of selected compliance records from the period reviewed. Information gathered through this process was then utilized to formulate enhancement recommendations for the program.

The objectives of the review included:

- Assessing the institution's capability of fully complying with NCAA regulations while fulfilling the outside-review requirement under NCAA membership standards;
- Evaluating the University's level of institutional control and its commitment to compliance with NCAA and University regulations; and
- Conducting a review of the compliance program systems and operations in four dimensions (communication, organization, documentation and evaluation) and offering enhancement recommendations.

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INDIVIDUALS INTERVIEWED

Trev Alberts, Director of Athletics

Mike Amundson, Director of Ticket Sales

Tracie Anderson, Athletic Certification Specialist

Matt Beacom, Assistant Athletic Director, Performance

Dean Blais, Head Men's Ice Hockey Coach

Dani Brooke, Student-Athlete Development Coordinator

Peggy Busch, General Manager, Nelligan Sports Marketing

Carly Cator, Women's Basketball Student-Athlete

John Christensen, Chancellor

Felipe Da Silva, Men's Soccer Student-Athlete

Dana Elsasser, Women's Softball Student-Athlete

Gary Freeman, Associate Athletic Director, Advancement

Terry Hanna, Director of Development

Derrin Hansen, Head Men's Basketball Coach

Matt Jakobsze, Director of Compliance

Chance Lindley, Head Women's Basketball Coach

David Noonan, Director of Athletic Performance

Ann Oatman, Associate Athletic Director, Chief Financial Officer

Jean Phillips, Associate Director of Financial Aid

Billy Sanders, Head Equipment Manager

Randy Sell, Director of Financial Aid

Rose Shires, Head Women's Volleyball Coach

Caleb Steffensmeier, Men's Basketball Student-Athlete

Lindsey Stineman, Director of Academic Success

William Wakefield, Faculty Athletics Representative

Josh White, Associate Director of Athletics, Leadership and Governance

Kerry Wollak, Women's Volleyball Student-Athlete

RECORDS REVIEWED

Summit League December 6-7, 2011, Compliance Review Report

UNO 2011-12 Athletic Compliance Manual

UNO 2012-13 Tutoring Manual

UNO 2012-13 Compliance Forms

UNO 2012-13 Student-Athlete Handbook

UNO Athletic Committee Minutes

UNO Athletic Policy & Procedure Manual

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