University of Nebraska Omaha Response to February 2013 Athletics Compliance Review Strategic Plan for Improvement

	СОМІ	PLIANCE INFRASTRUCTU	RE		
Objectives	Strategies & Benchmarks	People Responsible	Resources/Budget	Timelines	Status
1. Increase the University Athletics Committee's oversight responsibilities of the Athletic Department	 Chancellor (or Senior Compliance Administrator, as designated by Chancellor) appoint individuals (or University positions) to the University Athletics Committee, and name a Chairperson Chairperson should be expected to convene the Committee at regularly scheduled periods during the academic year Committee to assess the progress of implementing the audit's recommendations, assist in updating Athletics Dept. Compliance Policies & Procedures, review institutional violations Chairperson, and the committee, should report progress to Chancellor, Athletic Director, and University Counsel All committee members should be appointed on yearly basis 	 Chancellor Director of Athletics Senior Compliance Administrator Chairperson of University Athletics Committee (Deb Smith-Howell, Associate Vice Chancellor for Academic Affairs / Dean of Graduate Studies) 	\$0Monthly meeting	 Formally commission committee for 2013-14 fiscal year; Committee should report progress to Chancellor and Athletic Director and the end of each semester Format should mirror this Strategic Plan 	 University Athletics Committee was reestablished prior to the start of the 2013-14 academic year. Committee has met four times during the 2013-14 academic year, fulfilling the requirement of meeting periodically.
2. Establish an outside reporting line to the Chancellor and University/Outside Counsel for the Athletic Compliance Office	 Chancellor should establish institutional reporting line as part of the contract or letter of appointment for each individual with major compliance responsibilities Consider having Senior Compliance Administrator's primary reporting line be to Chancellor (or Senior Vice Chancellor for Academic & Student Affairs), with dotted line to Director of Athletics, which will encourage objectivity and demonstrates institutional control 	 Chancellor Director of Athletics 	 \$0 If primary reporting line to Chancellor, Chancellor's office may assume some responsibility to compensate 	 Immediate, so as to be in place for 2013-14 fiscal year, and implement the remainder of these recommendations 	• Not completed for the 2013-14 academic year. Has been set to be completed during summer 2014, so as to be implemented prior to the 2014-15 academic year.

3. Enhance relationships between Athletics, Registrar, Admissions, and Financial Aid	 Director of Compliance should establish regular meetings (over lunch?) with the Directors of each university area Meet regularly to review procedures, discuss and resolve issues, plan for future 	Director of Compliance	 Monthly meeting \$500 (if over lunch), \$0 otherwise 	 Recap issues at end of 2012-13 academic year Meet regularly in 2013-14 fiscal year 	 Not formally completed during the 2013-14 fiscal year. Compliance Office meets periodically throughout the year with Financial Aid to discuss procedures; is not a regularly set meeting schedule. Compliance Office talks with the Registrar's Office/Admissions Office on a weekly basis, establishing regular meetings as needed to discuss procedures or future planning.
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	MONITORINO	G SYSTEMS / FORMS /	RULES EDUCATION		
Objectives	Strategies & Benchmarks	People Responsible	Resources/Budget	Timelines	Status
1. Enhance the active monitoring of existing athletics compliance systems	 Add an additional full-time Compliance staff member to compliance office This Compliance Coordinator would be primarily responsible for monitoring and reconciling compliance-related documentation received from staff members in areas of Recruiting, Eligibility, Playing Seasons, Personnel, Ethical Conduct Create funding for a Graduate Assistant or hourly worker, which receives scholarship/stipend Continue to offer internship opportunities to Creighton and Nebraska Lincoln Law Schools 	 Chancellor Director of Athletics Senior Compliance Administrator Compliance Office 	 Compliance Coordinator: \$30,000 to \$35,000 1 Graduate Assistant or hourly worker (cost TBD) 	• For 2013- 14 fiscal year	 Did not add a Compliance Coordinator to the staff during the 2013-14 fiscal year; UNO is planning to add an additional Compliance member for the 2014-15 fiscal year. Did not take any steps in creating funding for a Graduate Assistant or hourly worker. Compliance did continue to offer internship opportunities to Creighton and Nebraska-Lincoln law schools, employing three individuals during the 2013-14 academic year.
2. Include all non- coaching staff and campus units in rules- education programing	 Require athletic trainers, ticket office staff, student managers (and other student workers), equipment managers, and administrative staff to attend Rules Education Meetings Have all individuals take the NCAA Coaches Certification Exam (or develop a similar tool for non-coaching staff members) on an annual basis. 	 Director of Athletics Senior Compliance Administrator 	 \$0 All staff attend monthly Compliance meeting: 1-2 hours per month 	• For 2013- 14 fiscal year	 Partially completed during the 2013- 14 fiscal year. Rules education meetings were created for Strength and Conditioning coaches; the remaining departments continue to receive printed educational materials of rules that affect them. Did not complete in having all athletic department individuals take the NCAA Coaches Certification Exam.
3. Establish a new- employee- orientation program that would incorporate the athletics compliance unit, as well as other units within the department	 HR/Business Office should provide new employees with a Letter of Appointment, which details title, starting date, salary, and rules compliance requirement HR/Business Office should notify heads of all departments (including Compliance) when new employee is hired This should apply to coaching staff and non- coaching staff HR/Business Office should provide new employee with a list of persons to meet with (i.e., Compliance, Facilities, 	 HR/Business Office Director of Compliance All other athletic department unit heads 	 20-40 hours to create "New Employee Orientation Program" 30-60 minutes per department each time new employee is hired 	• For 2013- 14 fiscal year	• Not completed for the 2013-14 fiscal year. UNO Athletic Department looking to hire on an additional Business Office position, in summer 2014; this position would be responsible for administering this program. Set for completion during the 2014-15 fiscal year.

	 Marketing/Ticketing, Equipment, Business, Development, Academic Success, Athletic Training) During new employee meeting, Compliance will discuss NCAA, Conference, and institutional rules and regulations relevant to that individual's position 				
4. Develop NCAA rules education for managers and student workers	 HR/Business Office should notify Compliance when new manager or student worker is hired New employee should be required to meet with Compliance to discuss the responsibilities of the employee's position After new employees attends Compliance training, employee signs certification form and retains educational documents 	 Director of Compliance Day-to-Day Compliance Administrator HR/Business Office 	 \$0 2 hours to compile educational material 30-60 minutes per new manager/ student worker 	• For 2013- 14 fiscal year	• Rules education and certification forms for team managers and student workers has been completed; those individuals must meet with Compliance and sign the form at the start of each academic year.
5. Hold end-of- spring-term rules-education meetings with each team	 Director of Compliance schedule meeting with each team During meeting, review applicable NCAA rules during the summer-vacation period (i.e., employment, outside competition, amateurism) 	 Director of Compliance Day-to-Day Compliance Administrator 	 \$0 2 hours to compile educational material 1 hour per team (15 hours total) 	 For end of 2012- 13 academic year 	• Completed for the 2012-13 academic year; has already been started for the 2014-15 academic year.

	FINANCIAL A	D			
Objectives	Strategies & Benchmarks	People Responsible	Resources/Budget	Timelines	Status
1. Establish sound, accurate, and reliable managem ent and oversight of athletic financial aid	 Charge individual or committee external of athletics with monitoring, implementing, sampling, and certifying athletic financial aid Hire individual to act as the Athletic Financial Aid Coordinator (or supplement the salary of an existing position) Provide written description of procedures for financial aid certification, and each individual's role in the financial aid process (Cashiering/Student Accounts, Financial Aid, Compliance, Athletic Business Office, Accounting) Charge Athletic Financial Aid Coordinator with the following: Establish Grant-in-Aid figure from the Cost of Attendance, and corresponding scholarship equivalencies (percentages) that equate to dollar amounts Accurately coordinate athletic financial aid scholarship distributions Accurately coordinate GIA checks / direct deposits Input and certify athletic financial aid scholarships on Compliance Assistance Interface (CAi), certify squad lists Coordinate and certify non-athletic institutional or non-institutional financial aid Randomly sample student-athlete accounts and compare to squad lists Design periodic systems tests to be performed to ensure accuracy of information (reconcile payroll records of student-athletes 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 	 Chancellor Director of Financial Aid & Scholarships Manager of Cashiering/Stude nt Accounts Senior Compliance Administrator Director of Compliance Athletic Financial Aid Coordinator 	• To be determined in discussions with new 2013-14 Director of Financial Aid	• For 2013- 14 fiscal year	 Not completed during 2013-14 fiscal year. Set to be completed for the 2014-15 fiscal year.

		ACADEMIC SUPPORT			
Objectives	Strategies & Benchmarks	People Responsible	Resources/Budget	Timelines	Status
1. Develop NCAA rules education for academic advisors, tutors, educational assistants, and student workers	 HR/Business Office and Director of Academic Success should notify Compliance when new tutor or student worker is hired New employee should be required to meet with Compliance to discuss the responsibilities of the employee's position (i.e., comp. tickets, academic fraud and preparation of student-athlete academic work, local transportation, occasional family home meals, other ethical conduct) After new employees attends Compliance training, employee signs certification form and retains educational documents 	 Director of Academic Success Director of Compliance Day-to-Day Compliance Administrator HR/Business Office 	 \$0 2 hours to compile educational material 30 minutes per new employee/student worker 	• For 2013-14 fiscal year	 Compliance and Academics conducted a rules education meeting with academic advisors at start of the 2013-14 academic year. The Athletic Department does not employ any tutors; despite attempts to do training with campus tutors, there has not been reception by those programs. Educational assistants and student workers are provided the Academic Tutoring Manual which outlines NCAA rules and requirements.
2. Enhance the institution's ability to serve its student- athletes and clearly communicate & monitor continuing eligibility standards to student- athletes and coaches. This area lags behind industry standards across Division I	• Add an additional full-time staff member to academic support office	 Director of Athletics Senior Compliance Administrator 	 Academic Coordinator (cost TBD) 	• For 2013-14, or 2014-15 fiscal year	• Completed for the 2013-14 fiscal year; one full-time additional staff member was added, along with another part-time academic support staff member.

	AGENTS / AMATEURISM	/ DISABILITY INSURA	NCE / GAMBLING		
Objectives	Strategies & Benchmarks	People Responsible	Resources/Budget	Timelines	Status
1. Enhance student- athletes' education on agents and amateurism	 Educate student-athletes on agents and amateurism during beginning-of-the-year meetings Create an Agent/Advisor registration form to be completed during the beginning-of-the-year meetings Ask former UNO 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." 	 Director of Compliance Day-to-Day Compliance Administrator 	 \$0 Additional 10-15 minutes during beginning-of- year meeting 	 Implement at beginning of 2013-14 academic year 	 Conducted an education session of agents and amateurism rules at the start of the 2013-14 academic year. Meeting included a form that asked Agent/Advisor information. Compliance has not yet integrated former UNO student-athletes into the agent education.
2. Ensure the amateur status of our student- athletes	• Seek additional amateurism from student-athletes in the fall of each year	 Director of Compliance Day-to-Day Compliance Administrator 	 \$0 Additional 10 minutes during beginning-of- year meeting 	 Implement at beginning of 2013-14 academic year 	• Completed for the 2013-14 academic year; Compliance asks for additional amateurism from student- athletes during the Beginning-of-the-Year meeting with each team.
3. Enhance student- athletes' education on gambling	 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 Stress that such presentations provide concrete and possibly local examples of gambling activity. Include more commonplace examples of gambling 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). 	 Director of Compliance Day-to-Day Compliance Administrator 	 \$0 Additional meeting during pertinent times of the academic year 	• For 2013-14 academic year	Completed for the 2013-14 academic year; UNO Athletic Department had local law enforcement speak at an all student- athlete meeting at the beginning of the year.

	AWARDS & EXTRA BENEFITS									
Objectives	Strategies & Benchmarks	People Responsible	Resources/Budget	Timelines	Status					
1. Accurately monitor all awards received by student-athletes and ensuring that the number and value of such awards comply with the applicable NCAA category.	 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. Create a form to monitor the purchase of awards for student-athletes Require Coaches to fill out said form(s) prior to the purchase of awards 	 Director of Compliance Day-to-Day Compliance Administrator 	 \$0 1-2 hours to create form 10-15 minutes to process form 	• For 2013-14 academic year	• Completed for the 2013-14 academic year; Student- Athlete Awards Form is now in use in the Athletic Department.					
2. Enhance staff education on extra benefits	 Educate student athletic trainers, team managers and equipment managers about NCAA extra benefit rules Require those individuals to annually sign a statement reflecting that they have undergone rules-education training and understand relevant NCAA rules. 	 Director of Compliance Day-to-Day Compliance Administrator 	 \$0 Additional meeting during pertinent times of the academic year 	• For 2013-14 academic year	• Not completed during the 2013- 14 academic year.					

	COACHING LIMITS / OUTSIDE INCOME REPORTING									
Objectives	Strategies & Benchmarks	People Responsible	Resources/Budget	Timelines	Status					
1. Accurately monitor and depict coaching limits	 Clearly assign responsibilities for monitoring numbers, duties, and compensation of coaches (volunteer, grad/undergrad) Update the current declaration of coaching staff forms to provide for non-coaching (e.g., Operations) personnel to be listed; Update the terminology used on the athletic department website and in athletics department media guides for coaching titles to be consistent with NCAA legislation governing coaching categories and limits 	 Communications Department Coaches Director of Compliance Day-to-Day Compliance Administrator 	 \$0 Update Coaching Staff Designation Form Communicate with Sports Information 	• For 2013-14 fiscal year	• Not completed during the 2013-14 fiscal year; set to be completed during the 2014-15 fiscal year.					

	COMPLIMENTARY ADMISSIONS									
Objectives	Strategies & Benchmarks	People Responsible	Resources/Budget	Timelines	Status					
1. Establish sound procedures for issuing complimentary tickets and admissions	 Require SAs to identify his/her relationship for each recipient Require each recipient to sign for his/her ticket Require coaches to designate recipients of complimentary admissions at designated time prior to game (i.e., before noon on game day) Consider internet based ticket package to ensure accurate record of ticket transfers 	 Ticketing Office Coaches Director of Compliance Day-to-Day Compliance Administrator 	 \$0 Update Complimentary Ticket Form Communicate with Ticketing Office 	• For 2013-14 fiscal year	 Formal ticketing procedures completed for student- athletes; procedure has not yet been implemented for coaching staff members. Utilizing JumpForward's internet ticketing program, which automatically tracks ticketing transfers. 					

	PLAYING AND PRACTICE SEASONS								
Objectives	Strategies & Benchmarks	People Responsible	Resources/Budget	Timelines	Status				
1. Enhance the active monitoring of existing athletics compliance activity logs	 Add an additional full-time Compliance staff member to compliance office Charge Compliance Coordinator with monitoring CARA logs, verifying CARA logs with random student-athletes, and mailing logs to SAs to review and sign 	 Senior Compliance Administrator Director of Compliance Compliance Coordinator 	 Compliance Coordinator: \$30,000 to \$35,000 	• For 2013-14 fiscal year	 Did not add a Compliance Coordinator to the staff during the 2013-14 fiscal year; UNO is planning to add an additional Compliance member for the 2014-15 fiscal year. Legal externs currently responsible for monitoring athletic compliance activity logs. 				

	PROMOTIONAL ACTIVITIES								
Objectives	Strategies & Benchmarks	People Responsible	Resources/Budget	Timelines	Status				
 Tighten procedure for student- athlete promotional activities 	 Develop procedure for coaches, admin, and student-athlete approval Create new form to educate the public on rules on promotional activities, and require Marketing, Business Office, and Compliance to certify each promotional activity Put new form on OMavs.com website for public to complete and send in 	 Senior Compliance Administrator Director of Compliance Assistant AD – Marketing Athletic Business Office Coaches Director of Community Relations 	 30 minutes: Update Procedure 30 minutes: Update form 30 minutes: review new procedure with affected individuals 	• Immediate	 SA Promotional Form has been completed, requires coach, admin, and student-athlete signatures for approval. Formal education on the SA Promotional Form has not been conducted yet with the Marketing Office. 				

RECRUITING							
Objectives	Strategies & Benchmarks	People Responsible	Resources/Budget	Timelines	Status		
1. Tighten procedure for recruiting and reimbursement	 Define the compliance oversight responsibility for the review of any financial transactions that occur in the recruiting process. Require the Business Office and Compliance Office to review each recruiting transaction in order to reconcile all of the information contained in the travel report, the receipts and the recruiting records. Require coaching staff members turn in a contact/evaluation sheet subsequent to every recruiting trip for which they seek expense reimbursement. 	 Senior Compliance Administrator Director of Compliance Athletic Business Office 	 30 minutes: Update Procedure 1 hour: Create new recruiting travel form 30 minutes: Review new procedure with affected individuals 	• Immediate	• Completed during the 2013- 14 fiscal year. Coaching staff members will not be reimbursed for recruiting expenses without logging the necessary recruiting activities with Compliance in advance.		

TEAM TRAVEL							
Objectives	Strategies & Benchmarks	People Responsible	Resources/Budget	Timelines	Status		
1. Enhance Coaches and Business Offices' understanding of NCAA travel rules	 Develop procedure Educate Coaches and Business Office on procedure and forms that must be filled out Establish institutional procedures for travel (now that 48/36-hour rule gone)? 	 Senior Compliance Administrator Director of Compliance Athletic Business Office 	 60 minutes: Update Procedure 60 hour: Create new form(s) 60 minutes: Review new procedure with affected individuals 	• For 2013-14 fiscal year	• Completed during the 2013- 14 fiscal year. The Athletic Department's Travel Policy was updated to reflect current practices and all Business Office personnel and Coaches were informed through monthly Coaches Education Meetings of all travel rules that pertained to their sport.		

CONTINUING, INITIAL, AND TRANSFER ELIGIBILITY CERTIFICATION							
Objectives	Strategies & Benchmarks	People Responsible	Resources/Budget	Timelines	Status		
 Set and detail the Compliance Department's oversight responsibilities over athletic eligibility certification 	 Establish written description of procedures for eligibility certification Detail the method by which eligibility is certified and documented by the Office of the Registrar and the department of athletics Subject all phases of the eligibility-certification system 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). Each step in the process, from advising student-athletes to final certification of eligibility, should be evaluated annually Ensure that written procedures/forms accurately reflect current practice; Ensure that written procedures/forms take into account applicable NCAA, conference and University regulations; Ensure that written procedures/forms accurately document the decision-making process Ensure that written procedures/forms provide appropriate checks and balances. 	 Senior Compliance Administrator Director of Records and Registration Athletic Certification Officer Director of Compliance 	 \$0 2 hour meeting: Update eligibility portion of policies and procedures manual 2 hour meeting: Require Athletics Compliance Committee to review procedures 	• For 2013-14 academic year	 Not completed during the 2013-14 academic year. Completion has been set for prior to the start of the 2014- 15 academic year. 		
2. Enhance campus understanding of NCAA eligibility rules and certification procedure	 Continue to provide formal 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. Consider having college deans, associate deans, the FAR, and perhaps the Chancellor, attend the annual session 	 Senior Compliance Administrator Director of Compliance Director of Records and Registration Athletic Certification Officer 	 \$0 1 hour meeting at beginning of academic year to review policies and procedures manual Other time as allotted to create and disseminate written rules education material 	• For 2013-14 academic year	 Compliance and Academics conducted a rules education meeting with academic advisors at start of the 2013- 14 academic year, addressing issues of NCAA eligibility and certification. Education session did not include college deans, associate deans, the FAR, or the Chancellor. 		