1.2.1. List all “conditions for certification” imposed by the committee in its Cycle 2 certification decision (if any) as they relate to Operating Principle 1.2 (Rules Compliance). For each condition, provide:
   a. The original “condition” imposed;
   b. The action(s) taken by the institution;
   c. The date(s) of the action(s); and
   d. An explanation for any partial or non-completion of such required actions.

No conditions imposed.

1.2.2. List all actions the institution has completed or progress it has made regarding all plans for improvement/recommendations developed by the institution during its Cycle 2 certification process for Operating Principle 1.2 (Rules Compliance). For each issue identified, provide:
   a. The original goal(s);
   b. The step(s) taken by the institution to achieve the goal(s);
   c. The date(s) the step(s) was completed; and
   d. An explanation for any partial or non-completion of the original goal(s) and/or step(s) to achieve the goal.

   Measurable Standard No. 1

If the institution developed a plan for improvement for Operating Principle 1.2 during Cycle 2, the institution must demonstrate that it has implemented its Cycle 2 plan or provide an explanation for partial completion of the plan.
   a. The committee will not accept the following explanations for partial completion or non-completion:
      (1) The institution did not possess sufficient funds to implement the plan.
      (2) The institution has had personnel changes since the original development of the plan.
      (3) The institution does not have documentation of actions taken to implement the plan.
   b. The committee will accept the following explanation for partial completion or non-completion:

   The institution has implemented a different plan(s) or a taken different action(s) to achieve or make progress toward the same goal outlined in its Cycle 2 plan.

1. Goal: Implementation procedures for reporting violations or potential violations.
   a. Steps Taken: In 2006, a policy for reporting and investigating rules violations was implemented. In September of 2007 the document was reviewed and approved by the FAR. In 2010, the document was reviewed by the University Athletics Committee and approved by the FAR. The current policy is posted on the MSU Website.
   b. Date(s) steps were taken: 2006/updated annually
   c. Not applicable

2. Goal: Calendar for regular meetings between the VP for Student Success and the Faculty Athletic Representative (FAR) is created. The FAR is scheduled to report to the Faculty Council periodically.
3. Goal: Create a complete job description for the FAR. The job description will be on file in the Department of Athletics and the President’s office. An evaluation process is implemented.
   a. Steps Taken: During the Fall 2010 term, the FAR initiated a review of the job description and annual performance evaluation. MSU has adopted a formal job description which includes the requirement for annual performance reviews by the President. The most recent evaluation was conducted in the spring of 2007.
   b. Date(s) steps were taken: Fall 2010
   c. Complete

4. Goal: A process for evaluation of Athletic coaches and staff is developed. Goals and objectives for each coach are defined. The evaluation process is implemented for all coaches and staff.
   a. Steps Taken: In the Bobcat Operations Manual developed in 2002, coach’s evaluations are discussed and required. Evaluations have been occurring annually since 2002.

   Coaches are evaluated as required by Montana State University. Evaluations are in all coaches’ files within the athletic department and copies of the evaluations are forwarded to the MSU Affirmative Action Office. Most evaluations use the form: Professional Employee Self Evaluation; although other forms are available on the human resources website. See below for an excerpt from the Bobcat Operations Manual concerning staff evaluations.

   b. Date(s) steps were taken: See above
   c. Complete

Department Staff Performance Evaluations (from the Bobcat Operations Manual)
The Department of Athletics requires that performance evaluations be conducted annually for each staff member by his/her immediate supervisor. Montana State University policies also require a written evaluation to be completed within six (6) months of the hire date for staff. The deadline for submitting performance evaluations is designated annually by the campus. The annual evaluation is used for the purposes of professional development, establishing specific goals and objectives, and counseling purposes. Sample tools are available on the MSU website – Human Resources section. Salary increases
based on merit will take performance evaluations into account. Each evaluation should be administered in a fair and equitable manner according to established policies and procedures.

**Guidelines**
The Department of Athletics believes that performance evaluations can be valuable tool in the assessment of an employee’s job-related skills and encourages each supervisor to conduct the evaluation in a professional and informative manner. The evaluation should accomplish the following:

- Establish goals and objectives for the coming year;
- Clarify the employee’s role within the Department;
- Review past job performance;
- Identify areas in which the employee needs improvement;
- Identify areas in which the employee excels;
- Provide an opportunity for the exchange of information between the employee and the supervisor; and
- Provide encouragement to the employee to develop and increase his/her job skills.

Each supervisor is encouraged to maintain an informal account of any significant events related to each employee’s performance and program within his/her area of responsibility. Supervisors should refer to these records when completing the evaluation form to ensure a fair evaluation and provide accurate commentary for each designated rating.

**Procedures**
The Director of Athletics coordinates all performance evaluations, to include monitoring the review process and consulting with the supervisor and employee, as requested. Listed below is the procedure for conducting performance evaluations.

1) The Director of Athletics sends evaluation forms to the supervisors for their designated staff. Forms are also available on the Human Resources page of the MSU website.

2) The supervisor completes the appropriate evaluation form to include all ratings and additional comments as outlined in the evaluation guidelines above.

3) The supervisor discusses the assigned ratings with the Director of Athletics.

4) The supervisor meets with the employee and fully discusses the ratings given. The employee should be allowed to make additional comments. The employee then signs and dates the form. (The signature of the employee does not indicate concurrence with the rating, but acknowledges that the rating was discussed with and read by the employee).

5) The performance evaluation is submitted to the Director of Athletics for review and inclusion in the employee’s departmental personnel file.

1.2.3. Describe any additional plans for improvement/recommendations developed by the institution since the Cycle 2 certification decision was rendered by the committee for Operating Principle 1.2 (Rules Compliance). For each additional plan, provide:
   a. The additional goal(s);
The only additional plan that was developed was in recommendations resulting from the Big Sky Compliance Review conducted in April of 2009. This document is addressed in items 1.2.13, 1.2.14, and 1.2.15.

1.2.4. **Describe how the institution ensures that rules compliance is a central element in personnel matters for individuals within the department of athletics.** Specifically, the institution must provide written evidence that all individuals inside the department of athletics (e.g., coaches, staff) have statements regarding the importance of rules compliance in all of the following documents:
   a. Contracts or letters of appointment;
   b. Job descriptions; and
   c. Performance evaluations.
   Please note, if the institution does not use one or more of the documents (listed in a-c above), provide an explanation.

**Measurable Standard No. 2**

The institution must provide written evidence that all individuals inside the department of athletics (e.g., staff, coaches) have statements regarding the importance of rules compliance in all of the following documents: contracts or letters of appointment, job descriptions and performance evaluations. If the institution is in the process of revising one or more of the documents noted above due its obligation to seek approval from an outside entity (e.g., union), the institution must provide written evidence supporting the planned revision. Please note, if an institution develops a plan for improvement in this area, the plan must be implemented prior to the completion of the certification process.

a) Contracts or letters of appointment

The language included in all head coaches contracts is:

“Coach is responsible to have knowledge of, and monitor compliance with, the applicable constitutions, bylaws, rules, policies, interpretations and regulations of the NCAA, the Big Sky Conference and the university that apply to ‘their sport’ program, its coaches and student-athletes (SA). Coach will consult, as necessary, and coordinate with MSU employees seeking to assure compliance with NCAA, Big Sky and university rules.”

The language included in all letters of appointment for athletic coaches is:

“**Conduct Expectations:** You shall at all times conduct yourself in accordance with and fully comply with the laws, regulations, rules and guidelines of the Big Sky Conference and the NCAA. Any violation of the foregoing shall constitute sufficient cause for immediate termination of your employment.”

“Specifically, as stated in the NCAA Manual, Bylaw 11.2.1, ‘a coach who is found in violation of NCAA regulations shall be subject to disciplinary or corrective action as set forth in the provisions of the NCAA enforcement procedures.’ Further, NCAA bylaw 11.2.1.1 states,” the
coach may be suspended for a period of time, without pay, or the coach’s employment may be terminated if the coach is found to be involved in deliberate violation of NCAA regulations.”

b) Job Descriptions

One of the qualifications for all position descriptions, and language to be included in job searches is, “Demonstrated knowledge of and commitment to NCAA and Big Sky Conference bylaws”. There are some department staff members that have position description language that includes “Responsible for complying with all Department of Athletics, Montana State University, NCAA, and Big Sky Conference rules and regulations.”

c) Performance evaluations

NCAA rules compliance is a vital and central part of the athletic department’s mission and beginning with the evaluation process in spring 2011, a specific item will be added to the instrument to verify this element.

Professional Staff:
- Commitment to Big Sky Conference and NCAA Rules
- Commitment to Big Sky Conference and NCAA Rules Education

1.2.5. Describe how the institution ensures that rules compliance is a central element in personnel matters for individuals outside the department of athletics who are involved in rules compliance activities. Specifically, the institution must provide written evidence that all individuals outside the department of athletics who are involved or associated with athletics (including, but not limited to, individuals who have responsibility for admission, certification of academic standing, evaluation of academic performance and administration of financial aid for student-athletes) have statements regarding the importance of rules compliance in all of the following documents:
  a. Contracts or letters of appointment;
  b. Job descriptions; and
  c. Performance evaluations.

Please note, if the institution does not use one or more of the documents (listed in a-c above), provide an explanation.

Measurable Standard No. 3

The institution must provide written evidence that all individuals outside the department of athletics who are involved or associated with athletics (including, but not limited to, individuals who have responsibility for admission, certification of academic standing, evaluation of academic performance and administration of financial aid for student-athletes) have statements regarding the importance of rules compliance in all of the following documents: contracts or letters of appointment, job descriptions and performance evaluations. If the institution is in the process of revising one or more of the documents noted above due its obligation to seek approval from an outside entity (e.g., union), the institution must provide written evidence supporting the planned revision. Please note, if an institution develops a plan for improvement in this area, the plan must be implemented prior to the completion of the certification process.

All classified performance evaluations include the following language regarding NCAA rules compliance:
Classified Staff:
  • Commitment to Big Sky Conference and NCAA Rules

Admissions Representative:

a) Contracts: Admission Representatives are classified staff members and are not placed on contracts or letter of appointments because the terms of their employment are defined by a collective bargaining agreement.

b) Job Descriptions: The Office of Admissions does not differentiate between students and athletes in their student recruitment or application process, so job descriptions do not have NCAA responsibilities specified. The Assistant Director of Admissions’ job description specifically states that this person “Works with the athletic department to verify admissibility of athletes in compliance with NCAA regulations.”

c) Performance Evaluation: In previous years, due to the collective bargaining process for classified staff, the use of standardized formats has not allowed the flexibility of identifying NCAA responsibilities in individual evaluations. However, effective the 2011 performance review cycle, classified staff who are assigned NCAA responsibilities will have statements included in the review that identify these responsibilities. The Assistant Director of Admissions performance evaluation will be adjusted in the 2011 performance review cycle to include the NCAA regulation performance metrics that are identified in the job description.

Financial Aid Representative (work location is in Athletic Department):

a) Contracts: Representative is a classified staff member and does not have contract or letter of appointment because the terms of employment are defined by a collective bargaining agreement.

b) Job description: The job description specifically identifies NCAA responsibilities by stating that this position “provides administrative support for 8 sports and 17 coaches as well as managing an approximate $2,000,000 budget for scholarships of approximately 250 student-athletes in compliance with guidelines of the NCAA, Big Sky Conference and Montana State University. Also manages and administers approximately 40 special scholarships (approximately $87,000) from the MSU Foundation and manages the NCAA Special Assistance fund.” The position description also identifies specific duties.

c) Performance Evaluation: The collective bargaining process requires standardized formats. The Associate Director of Athletics specifically addresses NCAA responsibilities in the annual evaluation.

Registrar Representative:

a) Contracts: Representative is a classified staff member and does not have a contract or letter of appointment because the terms of employment are defined by a collective bargaining agreement.

b) Job description: The job description specifically identifies NCAA responsibilities by stating that “this position will provide data collection and statistical analysis to determine NCAA eligibility for current students; review and determine initial admission eligibility; analyze and audit academic records each semester for current and continuing student-athletes; determine student-athlete progress toward degree completion; insure appropriate student-athlete enrollment for specific degree programs, serve as liaison between the Registrar and Enrollment Services Office and Athletics; provide eligibility and academic advice to student-athletes, the Athletic Academic Advising Center Coordinator and faculty advisor”.

Performance Evaluation: The collective bargaining process requires standardized formats. This person is evaluated annually and has been commended for her performance in handling the complexities of NCAA regulations.

1.2.6. **Provide the name(s) and title(s) of the institutional staff member outside the department of athletics who has ultimate responsibility in determining student-athletes’ admission to the institution, certification of academic standing and conferment of academic degrees.**

Measurable Standard No. 4

The institution must demonstrate that the responsibility for admission, certification of academic standing and conferment of academic degrees of student-athletes is vested in the same agencies that have authority in these matters for students in general.

The following individuals have ultimate responsibility to determine student-athletes’ formal admission to the institution, certify academic standing, and confer bachelor’s degrees:

Admissions Office:
- Rebecca Roeder, Asst. Director for Admissions; formal admission to Montana State University

Registrar’s Office:
- Bonnie Ashley, Interim Registrar, certification of eligibility to participate, completion of degree requirements, confer bachelor’s degrees
- Jody Ogata, NCAA Eligibility Specialist, certification coordinator

1.2.7. **Provide the name(s) and title(s) of the individual(s) (other than the institution’s compliance officer/director) who the chancellor or president designates as having final authority for the institution’s rules compliance (e.g., Director of Athletics, vice president for athletics).**

Measurable Standard No. 5

The institution must assign direct accountability for rules compliance to the individual the chancellor or president assigns final authority for the athletics program (e.g., director of athletics, vice president for athletics).

President Waded Cruzado has designated Peter Fields, MSU Director of Athletics, as the person who has final authority for MSU’s rules compliance.

1.2.8. **Identify the individuals inside and outside the department of athletics who have rules compliance responsibilities. Describe the reporting lines for and responsibilities assigned to these individuals, including but not limited to:**

   a. Faculty athletics representative;
   b. Director of athletics;
   c. Compliance officer/director;
   d. Coaches; and
   e. Other key individuals (e.g., admissions director, financial aid personnel, registrar) who are responsible for documenting and monitoring compliance with NCAA rules, including but not limited to:
      1. Eligibility certification;
      2. Investigation and self-reporting of violations;
(3) Monitoring of financial aid; and  
(4) NCAA Division I Academic Performance Program (APP).

Measurable Standard No. 6
The institution must identify individuals who have rules compliance-related responsibilities and the reporting lines of these individuals.

Measurable Standard No. 7
The institution must demonstrate that individuals external to the athletics program (including, but not limited to, financial aid personnel, registrar, faculty athletics representative) are engaged in the critical and sensitive areas of rules compliance. Examples of critical and sensitive areas of rules compliance include, but are not limited to, eligibility certification, investigation and self-reporting of rules violations, monitoring financial aid and academic performance program.

a) Faculty Athletics Representative: Bob Oakberg (FAR) reports directly to the President and has responsibilities including, but not limited to the following:

- Meets regularly with the President to provide assessments of various aspects of the Department of Athletics and its intercollegiate athletics programs, including academic integrity, compliance with NCAA Bylaws and the Big Sky Conference Operating Code, recruiting policies, gender equity, academic support, and the academic success and well being of student-athletes.

- Serves as the institution’s certifying officer concerning student-athlete academic eligibility.

- Serves as a voting ex-officio member of the University Athletics Committee and chairs the Compliance Subcommittee

- Investigates potential violations of NCAA Bylaws and Big Sky Conference rules.

- Interprets NCAA Bylaws and Big Sky Conference rules, in conjunction with Department of Athletics compliance staff, the Big Sky Assistant Commissioner for Compliance, and NCAA staff members

b) Director of Athletics: Peter Fields (Director of Athletics) sets the tone in the athletic department concerning the importance of following NCAA, Big Sky, and MSU rules and regulations, and oversees the compliance of all aspects of the athletics program. He delegates the daily compliance operations to Camie Bechtold (Compliance Officer) who informs him of all rules compliance issues. Peter’s responsibility is to make sure any violations get communicated and/or reported appropriately. Peter reports directly to President Cruzado.

c) Compliance Officer: Camie Bechtold (Associate Director of Athletics for Compliance and Student Services) reports directly to Peter Fields (Director of Athletics), but also has the authority to report directly to the Vice President for Student Success or the FAR if necessary in the event of a sensitive compliance situation. She is responsible for all compliance operations including compliance education, reporting of violations, coordinating certification of eligibility and academic
progress rate reporting, and monitoring daily compliance activities. More specifically, she is responsible for the following compliance responsibilities: (Appendix 1.2.8.a)

- Responsible for complying with all Department of Athletics, Montana State University, NCAA, and Big Sky Conference rules and regulations.
- Serves as department liaison for appropriate organizations to enhance knowledge and compliance with NCAA, Title IX, Big Sky Conference and University Regulations and bylaws.
- Serve as curator of the Department of Athletics Compliance Manual and the Student-Athlete Handbook.
- Be knowledgeable of and provide information on policies and procedures for the Big Sky Conference, NCAA, and Montana State University.

d) Coaches: Head Coaches report to their assigned sport administrator. Men’s Basketball and Football report to the Director of Athletics. Women’s Basketball, Track & Field, Cross Country, Skiing, and Women’s Golf report to the Senior Associate Director of Athletics, and Tennis and Volleyball report to the Associate Director of Athletics for Compliance and Student Services.

In additions, head coaches are responsible for the following compliance responsibilities:

- Adhere to and enforce all policies and procedures of the Department and University, as well as the rules and regulations of the Big Sky Conference, the NCAA and other authorities that may legitimately influence the intercollegiate athletics program.

- Oversee the recruitment and selection of student-athletes. Ensure compliance with NCAA guidelines for contacting and entertaining prospects. Coordinate with the Associate Director of Athletics for Compliance and Student Services the process of determining academic eligibility and issuing National Letter of Intent.

- Schedule and conduct regular practice sessions in and out of season, as permitted by NCAA rules and regulations. Develop and implement strategies for motivating student-athletes to perform at maximum levels as both individuals and a team.

- Ensure the team travel arrangements are in compliance with University, Big Sky Conference, and NCAA rules and regulations, to include monitoring the development of travel itineraries and coordination of travel.

- Hire, supervise, evaluate and terminate assigned assistant coaches, part-time coaches, volunteer coaches, administrative assistants, graduate assistants and other support staff to ensure their compliance with applicable rules, policies and procedures. Provide orientation training and guidance, as needed. Conduct annual performance evaluations as appropriate. Personnel changes require the approval of the Director of Athletics.
• Assure that booster clubs related to the sport program adhere to all rules and regulations of NCAA and Montana State University.

• Assure that sports camps related to the sport program adhere to all rules and regulations related to scheduling and NCAA procedures.

• Responsible for complying with all Department of Athletics, Montana State University, NCAA and Big Sky Conference rules and regulations.

Assistant Coaches report to their respective head coaches and are responsible for the following compliance responsibilities:

• Promote the philosophy and objective of the Department of Athletics, to include adhering to all Departmental policies and procedures, as well as the rules and regulations of the University, the Big Sky Conference, and the NCAA.

• Responsible for complying with all Department of Athletics, Montana State University, NCAA, and Big Sky Conference rules and regulations.

e) Other key individuals:

1) Jody Ogata (Registrar’s Office) is responsible for monitoring each student-athlete’s academic progress toward degree completion. She ensures each athlete meets all NCAA rules for academic eligibility and certifies their eligibility each semester. She serves on the eligibility certification team which meets regularly to discuss certification issues. Additionally, she reviews all APR data and is the individual responsible for inputting data into Compliance Assistant for certification review by the FAR. Jody, in consultation with the Registrar and in conjunction with the Athletics Department, annually reviews the policies related to certification of eligibility. Jody reports directly to Bonnie Ashley (Interim Registrar) regarding NCAA compliance issues.

2) Becky Roeder (Admissions Office) is responsible for the admission of all new undergraduate students to Montana State University. Students are admitted based on a set of policies and procedures designated by the Montana State Board of Regents. All students, without regard to athletic affiliation, are admitted using the same standards. Becky reports directly to Ronda Russell (Director of Admissions).

3) Brandi Payne, the Financial Aid Director (FAD), has compliance responsibility for the Office of Financial Aid Services. Working within the Athletics Office, the Office of Financial Aid Services employs Karolin Martinez, the Financial Aid Coordinator (FAC). The FAC does the awarding, monitoring, and administering of financial aid to MSU athletes under the oversight of the FAD and Associate Director for Compliance and Student Services (AAD). Working closely with the AAD, the FAC ensures that aid programs are awarded in compliance with governing regulations. The FAC and the AAD are responsible for monitoring student, team, and institutional aid limits. The FAD in conjunction with the Athletics Department annually reviews its policies and procedures to ensure compliance.
1.2.9. Indicate by clicking “yes” or “no” in the Athletics Certification System (ACS), whether the institution has written policies and step-by-step procedures that include assignment of specific responsibilities pertaining to rules compliance. Please note, all policies and procedures must be available during the evaluation visit. If the institution indicates a specific written policy and step-by-step procedure is not applicable, the institution must provide an explanation. Please use the file upload link contained within this question on ACS to submit an explanation if the institution selects N/A.

- a. Initial eligibility certification.
- b. Continuing-eligibility certification.
- c. Transfer-eligibility certification.
- d. APP.
- e. Financial aid administration.
- f. Recruiting.
- g. Camps and clinics.
- h. Investigations and self-reporting of rules violations.
- i. Rules education.
- j. Extra benefits.
- k. Playing and practice seasons.
- l. Student-athlete employment.
- m. Amateurism.

Measurable Standard No. 8
The institution must provide evidence that written compliance policies and procedures exist and demonstrate that they are engaged and functioning in the following areas:

- a. Initial-eligibility certification;
- b. Continuing-eligibility certification;
- c. Transfer-eligibility certification;
- d. NCAA Division I Academic Performance Program (APP) (e.g., data collection process, penalty implementation process);
- e. Financial aid administration, including individual and team limits;
- f. Recruiting (e.g., official and unofficial visits, hosts, entertainment, contacts, phone calls)
- g. Camps and clinics;
- h. Investigations and self-reporting rules violations;
- i. Rules education;
- j. Extra benefits;
- k. Playing and practice seasons;
- l. Student-athlete employment;
- m. Amateurism.

Please note, if an institution develops a plan for improvement in this area, the plan must be implemented prior to the completion of the certification process.

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<tr>
<th>Area</th>
<th>Yes/No</th>
<th>Reason for No</th>
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<tbody>
<tr>
<td>a. Initial-eligibility certification.</td>
<td>Yes</td>
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<td>b. Continuing-eligibility certification.</td>
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<td>c. Transfer-eligibility certification.</td>
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<td><strong>d. APP.</strong></td>
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<td><strong>e. Financial aid administration, including individual and team limits.</strong></td>
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<td><strong>f. Recruiting</strong></td>
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<td><strong>h. Investigations and self-reporting of rules violations.</strong></td>
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<td><strong>i. Rules education.</strong></td>
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<td><strong>m. Amateurism.</strong></td>
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Web links for each of the areas are:


See also Personnel P&P:

And Interpretation Policy:


l) Located in the Award and Benefits Policy

1.2.10. Describe how the institution’s written compliance policies and procedures are communicated on an annual basis to the department of athletics staff and individuals outside the department of athletics with rules compliance responsibilities.

Measurable Standard No. 9
The institution must demonstrate that its compliance policies and procedures are directly communicated in writing (e.g., provide hard copy of document, provide Web link via e-mail) on an annual basis to department of athletics staff and individuals outside the department of athletics with rules compliance responsibilities. Please note, if an institution develops a plan for improvement in this area, the plan must be implemented prior to the completion of the certification process.

Communication to department of athletics staff:
Athletics department staff communicates compliance policies and procedures routinely (more often than annually) to athletics department staff members in the following ways:

- The Athletics Compliance Office sends out emails to the Bobcat Listserv to remind all staff members of important policies. Emails are sent when updates occur and as new policies are introduced or incorporated.
- Meetings with head coaches are held the first and third Tuesday of every month with the Director of Athletics and Associate Director of Athletics to discuss athletic programs, compliance issues and policies.
- Compliance policies are posted on the MSU Bobcat website
- In August 2010, the Athletics Department conducted a meeting requiring mandatory attendance for all coaches (head, assistant, volunteers). The meeting focused on the review of policies and an overview of the website was provided to show where the policies can be found.
- Monthly compliance education meetings are conducted for all staff members, including coaches.
- A weekly email is distributed to all athletic staff members by the Compliance Officer with compliance education information.
- New departmental staff members are required to attend a new staff orientation conducted by the compliance office.

Communication to individuals outside the department of athletics with rules compliance responsibilities:
The individuals who have compliance responsibilities outside of athletics receive emails from the compliance office communicating appropriate policies and procedures. In addition, many of these individuals have a chance to review policies and procedures annually prior to them being approved. These individuals also receive the “Weekly Compliance Update” email which may contain reminders, updates on policies, new legislation, information on interpretations and other compliance related informational items on a weekly basis. Additionally, all compliance policies and procedures may be found on the www.msubobcats.com.

1.2.11. Describe the institution’s rules-education efforts for all individuals associated with the department of athletics, including the frequency and topics reviewed with each of the following groups:
   a. Boosters;
b. Student-athletes;  
c. Department of athletics staff;  
d. Coaches;  
e. Faculty; and  
f. Institutional staff outside the department of athletics.

**Measurable Standard No. 10**

*The institution must provide evidence that it has a continuous and comprehensive rules education program for all individuals associated with the athletics program including boosters, student-athletes, department of athletics staff, coaches, and directly involved faculty and institutional staff outside the department of athletics.*

a) Boosters

1. The athletic department produces and sends out a brochure explaining NCAA Bylaws that pertain to boosters. This document is included in season ticket mailings.
2. The compliance officer meets annually with the state-wide Bobcat Club Booster Board to discuss compliance related topics.
3. Annually, at the first home football game, the booster brochure and “Bobcat Booster Compliance 101” are placed in each suite prior to the game.

b) Student-Athletes

1. The compliance office conducts beginning of the year paperwork meetings in which the following topics are discussed: eligibility, financial aid, employment, extra benefits, agents, gambling, amateurism, CARA, outside competition, concussions and drug testing.
2. Annually, student-athletes are provided with a student-athlete handbook which contains important NCAA rules information.
3. At the end of the year, each team meets with the compliance officer to discuss summer activities and outside competition.
4. Occasionally, the compliance office will provide rules education in the form of a mass email to student-athletes.

c) Department of athletics staff

1. Monthly compliance education meetings are conducted for all staff.
2. A weekly email is distributed by the compliance office with compliance education information.
3. Occasionally, other important information is distributed via email from the compliance office.
4. The Compliance Office maintains a website with important information.
5. New departmental staff members are required to attend a compliance orientation meeting.

d) Coaches

1. Monthly compliance education meetings are conducted for all coaches and staff.
2. A weekly email is distributed by the compliance office with compliance education information (Weekly Compliance Email).
3. Occasionally, other important information is distributed via email from the compliance office.
4. The Compliance Office maintains a website with important information.
5. New coaches are required to attend a compliance orientation meeting.

e) Faculty
   1. We do not do any rules education for faculty; however, the compliance website is available for all to view.

f) Institutional staff outside the department of athletics
   1. The athletic department maintains a listserv of certain individuals across campus. The Weekly Compliance Email is distributed to these individuals. This includes individuals in the following offices: Admissions, President’s Office, Foundation, Financial Aid, University Studies, Alumni, International Programs, and Registrar.)

1.2.12. In regard to the institution's most recent rules compliance evaluation:
   a. Provide the name(s) and affiliation(s) of the individual(s) responsible for conducting the institution’s rules compliance evaluation;
   b. Describe the process used in selecting this authority outside the department of athletics to ensure the individual(s) does not have day-to-day compliance responsibilities for the institution’s department of athletics and is knowledgeable of NCAA legislation and rules compliance practices; and
   c. Provide the date of the institution’s most recent rules compliance evaluation.

**Measurable Standard No. 11**
The institution must demonstrate that its rules-compliance program is subject to a comprehensive, external rules compliance evaluation at least once every four years and is 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. Please note, if an institution develops a plan for improvement in this area, the plan must be implemented prior to the completion of the certification process.

   a) The review was conducted by Jaynee Nadolski, Assistant Commissioner for Compliance/SWA, Big Sky Conference.
   b) President Geoff Gamble requested the Conference Office conduct the review. The Big Sky Conference Office has done numerous reviews within the conference and is a trusted source for such reviews.
   c) The review was conducted on April 27-29, 2009 with the final report being issued to MSU on September 17, 2009.

1.2.13. The rules compliance evaluation must determine that the institution’s compliance practices are engaged and functioning and must include the required areas listed below. Indicate by clicking “yes” or “no” in the ACS which areas were included in the institution’s most recent rules compliance evaluation. If the institution indicates a specific area is not applicable, the institution
must provide an explanation. Please use the file upload link contained within this question on ACS to submit an explanation if the institution selects N/A.

a. Governance and organization.
b. Initial-eligibility certification.
c. Continuing-eligibility certification.
d. Transfer-eligibility certification.
e. APP.
f. Financial aid administration, including individual and team limits.
g. Recruiting (e.g., contacts and evaluations, official and unofficial visits).
h. Camps and clinics.
i. Investigations and self-reporting of rules violations.
j. Rules education.
k. Extra benefits.
l. Playing and practice seasons.
m. Student-athlete employment.
n. Amateurism.
o. Commitment of personnel to rules-compliance activities.

Measurable Standard No. 12
The institution must provide evidence that the comprehensive, external rules-compliance evaluation demonstrates that the rules-compliance program is engaged and functioning. Further, the institution must review the written, comprehensive evaluation as part of the self-study process and determine if appropriate corrective actions are necessary in response to the written report.

Measurable Standard No. 13
The institution must provide evidence that the comprehensive, external rules-compliance evaluation includes, at a minimum, the following areas;

a. Governance and organization (e.g., governing board policies related to athletics, responsibilities and duties of compliance personnel);
b. Initial-eligibility certification;
c. Continuing-eligibility certification;
d. Transfer-eligibility certification;
e. APP (e.g., data collection process, penalty implementation process);
f. Financial aid administration, including individual and team limits;
g. Recruiting (e.g., official and unofficial visits, hosts, entertainment, contacts, phone calls);
h. Camps and clinics;
i. Investigations and self-reporting of rules violations;
j. Rules education;
k. Extra benefits;
l. Playing and practice seasons;
m. Student-athlete employment;
n. Amateurism;
o. Commitment of personnel to rules-compliance activities.

All rules compliance evaluations conducted on/after September 1, 2008 must include the following new areas: governance and organization; APP; amateurism; and commitment of personnel to rules-compliance activities. If an institution’s rules compliance program has been evaluated at least once
in the past four years at the time of the self-study process and the evaluation was conducted prior to September 1, 2008, the institution is not required to include the four new areas in its evaluation or conduct an additional evaluation to include the four new areas. However, the institution must create a plan for improvement demonstrating that the four new areas of review will be included in the next scheduled rules compliance evaluation.

<table>
<thead>
<tr>
<th>Area</th>
<th>Yes/No</th>
<th>Reason for No</th>
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<tbody>
<tr>
<td>a) Governance and organization.</td>
<td>Yes</td>
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<tr>
<td>b) Initial-eligibility certification.</td>
<td>Yes</td>
<td></td>
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<tr>
<td>c) Continuing-eligibility certification.</td>
<td>Yes</td>
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<tr>
<td>d) Transfer-eligibility certification.</td>
<td>Yes</td>
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<td>e) APP.</td>
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<td>n) Amateurism.</td>
<td>Yes</td>
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<td>o) Commitment of personnel to rules-compliance activities.</td>
<td>Yes</td>
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</table>

1.2.14. Describe the process used by the institution during the development of the self-study to review the most recent rules compliance evaluation to determine any necessary corrective actions. In addition, identify the individuals involved with this review.

Measurable Standard No. 12

The institution must provide evidence that the comprehensive, external rules-compliance evaluation demonstrates that the rules-compliance program is engaged and functioning. Further, the institution must review the written, comprehensive evaluation as part of the self-study process and determine if appropriate corrective actions are necessary in response to the written report.

A sub-group of the Governance & Commitment to Rules Compliance Subcommittee composed of Daniel Adams, Director of Internal Audit; Larry Baker, Dean of the College of Education, Health and Human Development; and Pam Merrell, Assistant Legal Counsel reviewed the Big Sky Conference NCAA Division I Compliance Review (Compliance Review) from April 27-29, 2009. The composition of the sub-group was determined based on its members’ independence from MSU Department of Athletics’ operational responsibilities and experience in matters of regulation and compliance. The Compliance Review report had initially been provided to former MSU president Dr. Geoff Gamble; Peter Fields, Director of Athletics; Dr. Bob Oakberg, Faculty Athletics Representative and Camie Bechtold, Associate AD SWA/Compliance on September 17, 2009. None of the Governance & Commitment to Rules Compliance Subcommittee sub-group had reviewed the Compliance Review prior to the self-study.
1.2.15. Identify any relevant corrective action(s) planned as a result of the process described in Self-Study Item No. 14 or actions previously planned or implemented from the most recent rules compliance evaluation. Provide:
   a. The plan(s) or action(s) implemented; and
   b. The date(s) of action(s) taken or specific timetable(s) for completion of the plan(s).

The most recent compliance evaluation conducted by the Big Sky Conference included 72 recommendations as to how MSU Department of Athletics’ compliance program could be improved. Although there were a significant number of recommendations, Jaynee Nadolski, Big Sky Conference Assistant Commissioner/Compliance/SWA, who conducted the review stated, “I am very pleased with the policies and procedures that are currently in place. There appears to be ample communication with those departments on campus that work closely with the athletic department.” As of the time of this self-study report, MSU had already implemented 50 of the recommendations.

Online Resources Key
University Athletic Committee (UAC) Membership and Bylaws:
http://www.montana.edu/opa/coms/athletic.html
Procedures for Investigating/Reporting Secondary Rules Violations:
Bobcat Athletics Operations Manual:
Rules Interpretations:
Procedure for Certifying Athletics Eligibility:
MSU Personnel Policies (Bylaw 11):
MSU Playing & Practice Season Policies:
Athletic Department Procedures for Awarding Financial Aid:
MSU Recruiting Policies:
MSU NCAA Compliance Education Program:
Academic Performance Policy:
http://www.msubobcats.com/documents/2010/12/14/APP_11-12-2010.pdf?id=522
Awards & Extra Benefits Policies & Procedures:
Rules Education Policies:
1) Corrective Action 1: The role and oversight of the Faculty Athletics committee needs to be clarified and documented.
   a) The bylaws were reviewed and updated at the May 2010 UAC (University Athletics Committee) meeting to include an updated purpose and role of the UAC. The new version is now updated on the website.
   b) Spring 2010

2) Corrective Action 2: The Athletics Committee should be involved in all policy-making decisions within the athletic department. Consider having the Committee meet more than twice a year for discussions and review of policies. Specifically, policies and procedures related to compliance.
   a) The revised UAC bylaws require the group to meet at least twice per semester/four times per year. The bylaws also state, “The UAC shall review and oversee policy making decisions within the Department of Athletics.”
   b) Spring 2010

3) Corrective Action 3: Document the process in which a policy is approved for implementation in the athletic department.
   a) The University Athletics Committee bylaws say, “The UAC shall review and oversee policy making decisions within the Department of Athletics. The Director of Athletics will notify the UAC Chair of any proposed changes in the Department of Athletics’ Policy Handbook or Student-Athletes’ Policy Handbook. The UAC Chair will send the proposed policy changes to all members of the UAC for their comments and approval. The UAC members will have five business days to respond to the proposed policy changes. The comments will be sent to the Director of Athletics. If a majority of the UAC do not approve the policy change, the policy change will be discussed at the next regular meeting of the UAC and a revised policy change will be submitted to the UAC for comments and approval. If the implementation of the policy change is urgent, the UAC Chair could call a special meeting to consider the policy change”.
   b) Spring 2010

4) Corrective Action 4: Add language to written procedures for the conduct of all internal investigations to ensure that all investigations are expeditiously completed and reasonable due process is provided to all involved staff members and student-athletes.
   a) The written procedures for the conduct of internal investigations can be found in the Procedures for Investigating/Reporting Secondary Rules Violations updated in May 2010. The language for due process will be updated as necessary the next time the policy is updated.
   b) Spring 2010

5) Corrective Action 5: Reinforce commitment to rules compliance orally and through written documentation related to employment and personnel.
   a) The following statement is in each Head Coaches Contract: “Coach is responsible to have knowledge of, and monitor compliance with, the applicable constitutions, bylaws, rules, policies, interpretations and regulations of the NCAA, the Big Sky Conference and the university that apply to the Women’s Tennis program, its coaches and student-athletes. Coach will consult, as necessary, and coordinate with MSU employees seeking to assure compliance with NCAA, Big Sky and university rules.”

The following statement is in each letter of appointment for each Assistant Coach: “You shall at all times conduct yourself in accordance with and fully comply with laws, regulations, rules and guidelines of the Big Sky Conference and the NCAA.”
Also, Professional staff have a statement in their Professional Position Description that refers to the NCAA regulations attached to the position.

There is not a statement in Classified Staff Employment Agreements.

Additionally, the Bobcat Athletics Operations Manual states, “ALL EMPLOYEES GUIDING PRINCIPLES Operating within the policies of MSU, the Big Sky Conference, and the NCAA are paramount for all employees. The department expects all employees to have knowledge of the rules, regulations, policies, and procedures that pertain to their area of expertise, and to seek out clarification or extra information when necessary and before any action is taken. The department requires each employee to self monitor compliance to all rules and regulations and report any concerns or oversights immediately. For NCAA rules and regulations, all employees are reminded of the principles of NCAA bylaw 10.1.” (page 141)

b) Summer 2009

6) Corrective Action 6: Create and document a system that clearly contains the appropriate information regarding any rules interpretations requested and provided.
   a) The written procedures were updated the Summer of 2010 and can be found online in Rules Interpretations.
   b) Summer 2010

7) Corrective Action 7: Allocate more funding for staffing in the Compliance Office to ensure that the compliance staff is able to cover the broad spectrum of compliance within the institution.
   a) A half-time position (half of a full-time business office position) was allocated to Compliance to assist with daily responsibilities and documentation/reporting.
   b) Summer 2010

8) Corrective Action 8: Audit a specific segment of the Compliance program annually. For example, conduct an audit (preferably by the institution's internal auditor) of the Financial Aid program one year, the Eligibility Certification program the next, etc. Review these audits each year as an athletic department and University.
   a) MSU Internal Audit (IA) develops a risk-based engagement plan at least annually to determine its priorities. IA intends to include the Athletics Compliance program in its engagement plan development process beginning fiscal year 2012 and will conduct work in this area as determined by this process.
   b) FY 2012

9) Corrective Action 9: Document and clarify that the President is responsible for final certification. The Faculty Athletic Representative is the President's designee to certify eligibility.
   a) The Procedure for Certifying Athletics Eligibility document contains the statement, “The CEO/President will designate an individual on the institution’s staff to administer proper certification of eligibility”. Further, the President signs this document annually.

   Also, the Bobcat Athletics Operations Manual (page 7) states, “The President is responsible to the Board of Regents and is the chief executive officer directing the operation of the University and all of its programs and services, including intercollegiate athletics. The President is the University’s official who is responsible for certifying that the University is in compliance with all NCAA and Big Sky Conference rules and regulations.”
   b) Summer 2009
10) Corrective Action 10: Identify prospective and returning student-athletes in the admissions and registration offices by assigning a sport's code for tracking purposes. Flag all student-athletes in Banner and consider bridging Banner and CAi.
   a) The SGASPRT screen in Banner is used to more readily help identify student-athletes. The athletics department can run reports to assess the following: full-time enrollment, confirmation of attendance, majors, financial aid fund sources and outside awards.
   
   Additionally, the Drop/Add form has a new field for student-athletes to self identify themselves. This process reminds students that they also need an Athletic Academic Center signature prior to dropping a class (after the online drop/add period ends).
   b) Fall 2009

11) Corrective Action 11: Include in staff members' contracts or letters of appointment rules-education participation as a condition of employment, as well as a formal statement on the importance of rules compliance.
   a) MSU Personnel Policies (Bylaw11) have been updated to address this comment, but has not placed these requirements into contracts and letters of appointment for appropriate positions or letters of hire for classified staff. MSU will develop a strategy to accomplish this.
   b) Partially implemented, full compliance by AY 2013

12) Corrective Action 12: Identify individuals within the registrar's or admission's offices to receive rules-education assistance. Have these individual's present topics at a rules-education meeting to keep them involved in the process. Evaluate registrar and admissions office staff members on their participation in rules-education programs and their knowledge and application of NCAA rules.
   a) We have identified individuals across campus and send them the WEEKLY COMPLIANCE UPDATE email. These individuals are: Jody Ogata, Registrar’s Office; Becky Roeder, Admissions; Tom Jewell, Financial Aid. Jody Ogata attended NCAA Regional Rules Seminar in the summer of 2010 in Indianapolis, IN.
   b) Summer 2010

13) Corrective Action 13: Implement an end-of-the-year meeting with all teams to review eligibility rules and remind student-athlete's of NCAA rules during the summer.
   a) This is required per the new MSU Playing and Practice Season Policies adopted in the Fall of 2010. The policy says, “OUTSIDE COMPETITION. The head coach of each team, in cooperation with the compliance office, is responsible for scheduling a compliance meeting with the team to discuss outside teams and summer activities. This meeting must be conducted during the second semester and prior to the end of each academic year.”
   b) Fall 2010

14) Corrective Action 14: Limit communications between the athletic department and the admissions/registration offices to officially designated liaison's in each department. Document the policy in writing.
   a) The follow statements have been added to the designated policies: FINANCIAL AID 6) “Additionally, coaches are not permitted to contact the Financial Aid directly. Coaches should contact the Financial Aid Coordinator (FAC) or Compliance Office with FA questions.” Found online at Athletic Department Procedures for Awarding Financial Aid.
   ELIGIBILITY 11) “Coaches may not contact academic departments concerning the eligibility of student-athletes or prospective student-athletes (PSA). All communication concerning
eligibility must be coordinated through the AC Staff or Compliance Office.” Found online at Procedure for Certifying Athletics Eligibility.

Additionally, an email went out to all staff on July 1, 2010: “Coaches, Per our policies, Coaches are not permitted to contact Admissions, Financial Aid, the International Office, Academic Departments. Although some of these policies are not written at this time, they will be soon and have been a general best practice up to this time. As a reminder, our policies can be found on the compliance website at msubobcats.com. I have had several reports of our coaches contacting these offices lately. Any contact should be coordinated through our Academic Center or Compliance Office. These offices should not deal directly with our coaches as it 1) put us at risk for institutional control issues and 2) often results in these offices, that we depend on to help us, feeling pressured by our coaches. If you are a head coach, please relay this to your assistants.”

b) Summer 2010

15) Corrective Action 15: Include compliance-related responsibilities/duties in job descriptions and performance-evaluation criteria of all persons involved in the certification process.

a) Admission Representative:
   - Contracts: Admission Representatives are classified staff members and are not placed on contracts or letter of appointments.
   - Job Descriptions: The Office of Admissions does not differentiate between students and athletes in their student recruitment or application process, so job descriptions do not have NCAA responsibilities specified.
   - The Assistant Director or Admissions does have a job description that specifically identifies a NCAA general statement of responsibility:
     o *Works with the athletic department to verify admissibility of athletes in compliance with NCAA regulations."

Registrar Representative
   - Contracts: Representative is a classified staff member and does not have a contract or letter of appointment.
   - Job description specifically identifies NCAA responsibilities:
     o “this position will provide data collection and statistical analysis to determine NCAA eligibility for current students; review and determine initial admission eligibility; analyze and audit academic records each semester for current and continuing student-athletes; determine student-athlete progress toward degree completion; insure appropriate student-athlete enrollment for specific degree programs, serve as liaison between the Registrar and Enrollment Services Office and Athletics; provide eligibility and academic advice to student-athletes, the Athletic Academic Advising Center Coordinator and faculty advisor”.
   - Performance Evaluation: Collective bargaining process requires standardized formats. Employee’s most recent Classified Performance Evaluation submitted 3/17/10 in which she is evaluated, and commended, for her performance in “handling the complexities of NCAA regulations with ease. She often works with sensitive or highly publicized issues for student-athletes, and provides well thought and researched decisions to search for resolution …”

b) Spring 2011
16) Corrective Action 16: Update a job description for the Faculty Athletic Representative to accurately reflect the responsibilities of the FAR.
   a) Completed and approved by the President.
   b) Fall 2010

17) Corrective Action 17: Evaluate the Faculty Athletic Representative's performance on a yearly basis.
   a) This was written into the job description of the FAR at the end of 2010. The last evaluation was conducted in the Spring of 2007, which is on file in the President’s Office (see Shari McCoy). The next official written evaluation will be in April 2011.
   b) Spring 2011

18) Corrective Action 18: Develop in writing the specific procedures and responsibilities of individuals involved in the certification of eligibility and the process used.
   a) This is completed and can be found online at Procedure for Certifying Athletics Eligibility. This document was created in the Fall of 2007 and has been updated annually since.
   b) Fall 2007

19) Corrective Action 19: Document that there is no difference in the admissions process for general students vs. student-athletes.
   a) We will work with Admissions to develop language to document this ongoing practice.
   b) AY 2012

20) Corrective Action 20: Designate in writing the process for determining the back-up to the Certifying Officer.
   a) This process will be updated in the new FAR Job Description and in the supporting document intended to guide the Faculty Senate and President in appointing and evaluating the FAR.
   b) Fall 2010

21) Corrective Action 21: Require coaches to sign a squad list or eligibility checklist prior to leaving on any road trips to ensure that a student-athlete who is ineligible does not travel or compete.
   a) Coaches sign a squad list each semester, but not prior to each trip. This is documented in the Procedure for Certifying Athletics Eligibility (number 7). Requiring this before each trip is unrealistic given the size of the compliance staff.
   b) Fall 2008

22) Corrective Action 22: Designate a Committee with the aptitude to understand the eligibility certification needs of Montana State evaluate the policies and procedures for certification of continuing eligibility of student-athletes regularly and consider subjecting the entire eligibility certification program to an internal audit.
   a) The University Athletics Committee has adopted the responsibility of reviewing policies. See the bylaws online.

   MSU Internal Audit (IA) develops a risk-based engagement plan at least annually to determine its priorities. IA intends to include the Athletics Compliance program in its engagement plan development process beginning fiscal year 2012 and will conduct work in this area as determined by this process.
   b) Spring 2010
23) Corrective Action 23: Bridge Banner and CAi as a means of streamlining the financial aid process, including the squad list. This will allow financial aid staff members more time to work on other issues that may arise.
   a) This item is on the task list of the Student Affairs Banner Module Team Leader.
   b) FY 2013

24) Corrective Action 24: Identify student-athletes regardless of whether they are receiving athletics or other institutional financial aid in the Banner system so that the Financial Aid office can access this information.
   a) Student-Athletes are identified as such in SGASPR in Banner.
   b) Fall 2007

25) Corrective Action 25: Periodically evaluate the policies and procedures for awarding financial aid to student-athletes.
   a) This is completed and can be found online at Athletic Department Procedures for Awarding Financial Aid. This document was created in the Fall of 2007 and has been updated annually since.
   b) Fall 2007

26) Corrective Action 26: Limit communications between the athletic department and the Financial Aid Office to officially designated liaison's in each department. Document the policy in writing.
   a) The follow statements have been added to the designated policies:
      FINANCIAL AID 6) “Additionally, coaches are not permitted to contact the Financial Aid directly. Coaches should contact the Financial Aid Coordinator (FAC) or Compliance Office with FA questions.” Found online at Athletic Department Procedures for Awarding Financial Aid.
      ELIGIBILITY 11) “Coaches may not contact academic departments concerning the eligibility of student-athletes or prospective student-athletes (PSA). All communication concerning eligibility must be coordinated through the AC Staff or Compliance Office.” Found online at Procedure for Certifying Athletics Eligibility.
      Additionally, an email went out to all staff on July 1, 2010: “Coaches, Per our policies, Coaches are not permitted to contact Admissions, Financial Aid, the International Office, Academic Departments. Although some of these policies are not written at this time, they will be soon and have been a general best practice up to this time. As a reminder, our policies can be found on the compliance website at msubobcats.com. I have had several reports of our coaches contacting these offices lately. Any contact should be coordinated through our Academic Center or Compliance Office. These offices should not deal directly with our coaches as it 1) put us at risk for institutional control issues and 2) often results in these offices, that we depend on to help us, feeling pressured by our coaches. If you are a head coach, please relay this to your assistants.”
   b) Summer 2010

27) Corrective Action 27: Develop a comprehensive rules-education program for designated liaisons within the financial aid office.
   a) At this time, we have identified individuals across campus and send them the WEEKLY COMPLIANCE UPDATE email. Additionally, in the Fall of 2010, the two offices are working to schedule a rules education session.
   b) Summer 2010
28) Corrective Action 28: Evaluate Financial Aid Office staff members who have compliance responsibilities on their participation in rules-education programs and their knowledge and application of NCAA rules.
   a) Collective bargaining process requires standardized formats; however, the Assistant Director of Athletics specifically addresses NCAA responsibilities in yearly evaluation.
   b) Spring 2011

   a) Contracts: Representative is a classified staff member and does not have contract or letter of appointment.
      Job description specifically identifies NCAA responsibilities:
      • “provides administrative support for 8 sports and 17 coaches as well as managing an approximate $2,000,000 budget for scholarships of approximately 250 student-athletes in compliance with guidelines of the NCAA, Big Sky Conference and Montana State University. Also manages and administers approximately 40 special scholarships (approximately $87,000) from the MSU Foundation and manages the NCAA Special Assistance fund.”
      • Position description identifies specific duties.
   b) Spring 2011

30) Corrective Action 30: Include in staff members' contracts or letters of appointment rules-education participation as a condition of employment.
   a) MSU will develop a strategy to place these requirements into contracts for appropriate positions on letters of appointment or letters of hire for classified staff.
   b) AY 2013

31) Corrective Action 31: Once a year, conduct an internal audit of student-athletes' financial aid files. Report the audit results to the Committee charged with oversight of the athletic department.
   a) MSU Internal Audit (IA) develops a risk-based engagement plan at least annually to determine its priorities. IA intends to include the Athletics Compliance program in its engagement plan development process beginning fiscal year 2012 and will conduct work in this area as determined by this process.
   b) FY 2012

32) Corrective Action 32: Designate one staff member from the Financial Aid Office as a liaison for rules-education matters.
   a) The athletic department has designated two individuals in the Financial Aid Office to receive rules education; Tom Jewell and Brandi Payne.
   b) Summer 2010

33) Corrective Action 33: Financial Aid staff members should attend FAFSA or NCAA Regional Rules to stay abreast of the latest legislation, rules and technology in order to do their jobs more thoroughly and efficiently.
   a) In July 2010, the Director of Financial Aid attended the National Association of Financial Aid Administrators (NASFAA) annual convention. Additionally, Financial Aid employees attend regional and state-wide NASFAA meetings and NASFAA webinars.
In the future, financial aid employees will attend regional and state wide meetings annually. NASFAA has developed strategies to provide continuing education that does not require travel such as webinars and a daily newsletter that keeps employees up to date on all issues in the field. These additional sources of education will continue at MSU.

b) Summer 2010

34) Corrective Action 34: Enhance monitoring of recruiting activities. Provide the individual(s) responsible enough time and resources to permit effective and regular monitoring or recruitment activities.
   a) We have written policies concerning monitoring of recruitment activities. They can be found online at MSU Recruiting Policies. A half-time person has been assigned to assist in tracking the necessary paperwork.
   b) Summer 2010

35) Corrective Action 35: Develop written procedures to document the recruitment monitoring process and outline individual's responsibilities.
   a) We have written policies concerning monitoring of recruitment activities. They can be found online at MSU Recruiting Policies. A half-time person has been assigned to assist in tracking the necessary paperwork.
   b) Summer 2010

36) Corrective Action 36: Implement procedures that ensure appropriate institutional staff members are made aware of all prospective student-athlete who are actively being recruited.
   a) We have written policies concerning monitoring of recruitment activities. They can be found online at MSU Recruiting Policies. A half-time person has been assigned to assist in tracking the necessary paperwork.
   b) Summer 2010

37) Corrective Action 37: Periodically evaluate the effectiveness of the recruitment monitoring process.
   a) MSU Internal Audit (IA) develops a risk-based engagement plan at least annually to determine its priorities. IA intends to include the Athletics Compliance program in its engagement plan development process beginning fiscal year 2012 and will conduct work in this area as determined by this process.
   b) FY 2012

38) Corrective Action 38: Collect and store (for a minimum of six years) all recruiting documentation (individual recruiting files, expense reports, etc.)
   a) The Recruiting Policy referenced in items 34 through 37 has been adopted. We now have a comprehensive recruitment record of each PSA that matriculates to MSU.
   b) Summer 2010

39) Corrective Action 39: Limit communications between the athletics department and institutional offices involved in the recruitment process (admissions, financial aid) to officially designated liaisons in each office and department. Document the policy in writing.
   a) The follow statements have been added to the designated policies: FINANCIAL AID 6) “Additionally, coaches are not permitted to contact the Financial Aid directly. Coaches should contact the Financial Aid Coordinator (FAC) or Compliance Office with FA questions.” Found online at Athletic Department Procedures for Awarding Financial Aid.
ELIGIBILITY 11) “Coaches may not contact academic departments concerning the eligibility of student-athletes or prospective student-athletes (PSA). All communication concerning eligibility must be coordinated through the AC Staff or Compliance Office.” Found online at Procedure for Certifying Athletics Eligibility.

Additionally, an email went out to all staff on July 1, 2010: “Coaches, Per our policies, Coaches are not permitted to contact Admissions, Financial Aid, the International Office, Academic Departments. Although some of these policies are not written at this time, they will be soon and have been a general best practice up to this time. As a reminder, our policies can be found on the compliance website at msubobcats.com. I have had several reports of our coaches contacting these offices lately. Any contact should be coordinated through our Academic Center or Compliance Office. These offices should not deal directly with our coaches as it 1) put us at risk for institutional control issues and 2) often results in these offices, that we depend on to help us, feeling pressured by our coaches. If you are a head coach, please relay this to your assistants.”

b) Summer 2010

40) Corrective Action 40: Evaluate coaches’ recruitment files for each prospect.
   a) With the adoption of the policy referenced in item 34, the compliance office will have these files within the athletic department.
   b) Summer 2010

41) Corrective Action 41: Develop a system where printed recruiting materials (questionnaires, brochures, media guides, note cards) are approved by the Compliance Office.
   a) MSU will create and implement at a future date
   b) FY 2012

42) Corrective Action 42: Create an Unofficial Visit Form for use in monitoring recruiting activities.
   a) This has been created and can be found online at MSU Recruiting Policies.
   b) Summer 2010

43) Corrective Action 43: Evaluate institutional staff members inside and outside of athletics who have compliance responsibilities on their participation in rules-education programs and their knowledge and application of NCAA rules.
   a) We plan to develop a strategy to monitor the effectiveness of the rules education program, compile attendance lists and distribute to supervisors.
   b) FY 2013

44) Corrective Action 44: Conduct year-end meetings on a sport-by-sport basis to discuss rules-education issues relevant to coaches’ and student-athletes’ year-end concerns and activities.
   a) This was done for the first time last spring. It is required per the new MSU Playing and Practice Season Policies adopted in the Fall of 2010. The policy says, “OUTSIDE COMPETITION
   The head coach of each team, in cooperation with the compliance office, is responsible for scheduling a compliance meeting with the team to discuss outside teams and summer activities. This meeting must be conducted during the second semester and prior to the end of each academic year.”
   b) Fall 2010
45) Corrective Action 45: Coordinate a special rules-orientation and operating-procedures program for staff members, particularly those with limited previous exposure to NCAA and Big Sky rules and regulations.
   a) We implemented a required compliance orientation for new staff. It can be found in the MSU Personnel Policies (Bylaw 11):
      “ORIENTATION FOR NEW STAFF
      Each new staff member of the department is required to complete a Compliance Orientation Session within two weeks of employment. The supervisor is responsible for scheduling this session with the Compliance Office.
      The agenda for the session will include the following:
      ✓ Distribution of a current NCAA Division I Manual
      ✓ Review of the msubobcats.com website to include all compliance documents and compliance manual
      ✓ Distribution of the MSU and MSU Athletic Department Mission Statement
      ✓ Introduction to the MSU Athletic Department Operations Manual
      ✓ Review of MSU Bylaw 10.1 and 10.3
      ✓ Review of requirement that the staff member is to attend monthly compliance education sessions for a period of one year after employment begins.
      ✓ Coach must take the NCAA Practice test and achieve a passing score. All missed questions will be reviewed. The coach must pass the test within one month of employment.”
   b) Fall 2010

46) Corrective Action 46: Assign responsibility to coaches to serve as liaison for their sport to review NCAA rules with student-athletes.
   a) We plan to develop a strategy for training coaches on issues/rules education and assign responsibilities to coaches.
   b) FY 2012

47) Corrective Action 47: Review and update written documentation outlining the scope of the rules-education program, including the responsibilities of individuals designated to assist with the rules-education program and its target audience.
   a) Rules education policies were updated in December of 2010 and can be found online.
   b) Fall 2010

   a) MSU Internal Audit (IA) develops a risk-based engagement plan at least annually to determine its priorities. IA intends to include the Athletics Compliance program in its engagement plan development process beginning fiscal year 2012 and will conduct work in this area as determined by this process.
   b) FY 2012

49) Corrective Action 49: Institutional staff members inside and outside athletics should have a formal statement on the importance of rules compliance in all contracts/letters of employment, job description and performance evaluations.
   a) **Inside Athletics:**
      • Contracts or letters of appointment: Language included in all head coaches contracts:
        “Coach is responsible to have knowledge of, and monitor compliance with, the applicable constitutions, bylaws, rules, policies, interpretations and regulations of the NCAA, the Big Sky Conference and the university that apply to ‘their sport’ program, its coaches and
student-athletes. Coach will consult, as necessary, and coordinate with MSU employees seeking to assure compliance with NCAA, Big Sky and university rules.”

Language included in all letters of appointment for athletic coaches:

Conduct Expectations: You shall at all times conduct yourself in accordance with and fully comply with the laws, regulations, rules and guidelines of the Big Sky Conference and the NCAA. Any violation of the foregoing shall constitute sufficient cause for immediate termination of your employment.”

“Specifically, as stated in the NCAA Manual, Bylaw 11.2.1, ‘a coach who is found in violation of NCAA regulations shall be subject to disciplinary or corrective action as set forth in the provisions of the NCAA enforcement procedures.’ Further, NCAA bylaw 11.2.1.1 states,’ the coach may be suspended for a period of time, without pay, for the coaches employment may be terminated if the coach is found to be involved in deliberate and violations of NCAA regulations.’”

• Job Descriptions: One of the qualifications on all position descriptions and job searches includes language, “Demonstrated knowledge of and commitment to NCAA and Big Sky Conference bylaws”. There are some department staff members that have language in job descriptions that includes “Responsible for complying with all Department of Athletics, Montana State University, NCAA, and Big Sky Conference rules and regulations”.

• Performance Evaluations: Currently there is no specific language that is included in the university performance evaluation instrument covering NCAA rules. However, NCAA rules compliance is a vital and central part of the athletic department’s mission and beginning with the evaluation process, Spring 2011, a specific item will be added to the instrument as to verify this element is included.

Outside Athletics:

Admission Representative:

• Contracts: Admission Representatives are classified staff members and are not placed on contracts or letter of appointments.

• Job Descriptions: The Office of Admissions does not differentiate between students and athletes in their student recruitment or application process, so job descriptions do not have NCAA responsibilities specified.

• The Assistant Director or Admissions does have a job description that specifically identifies a NCAA general statement of responsibility:
  o *Works with the athletic department to verify admissibility of athletes in compliance with NCAA regulations.”

• Performance Evaluation: Collective bargaining process requires standardized formats. Does not identify NCAA responsibility in evaluation.

Registrar Representative:

• Contracts: Representative is a classified staff member and does not have a contract or letter of appointment.

• Job description specifically identifies NCAA responsibilities:
  o “this position will provide data collection and statistical analysis to determine NCAA eligibility for current students; review and determine initial admission eligibility; analyze and audit academic records each semester for current and continuing student-athletes; determine student-athlete progress toward degree completion; insure appropriate student-athlete enrollment for specific degree programs, serve as liaison between the Registrar and Enrollment Services Office and Athletics; provide eligibility and academic advice to student-athletes, the Athletic Academic Advising Center Coordinator and faculty advisor”.
- Performance Evaluation: Collective bargaining process requires standardized formats. Employee’s most recent Classified Performance Evaluation submitted 3/17/10 in which she is evaluated, and commended, for her performance in “handling the complexities of NCAA regulations with ease. She often works with sensitive or highly publicized issues for student-athletes, and provides well thought and researched decisions to search for resolution. …”

Financial Aid Representative (works in Athletic Department):
- Contracts: Representative is a classified staff member and does not have contract or letter of appointment.
- Job description specifically identifies NCAA responsibilities:
  - Provides administrative support for 8 sports and 17 coaches as well as managing an approximate $2,000,000 budget for scholarships of approximately 250 student-athletes in compliance with guidelines of the NCAA, Big Sky Conference and Montana State University. Also manages and administers approximately 40 special scholarships (approximately $87,000) from the MSU Foundation and manages the NCAA Special Assistance fund.”
  - Position description identifies specific duties.
- Performance Evaluation: Collective bargaining process requires standardized formats; however, the Associate Director of Athletics specifically addresses NCAA responsibilities in the annual evaluation.
  
b) Varies

50) Corrective Action 50: Enforce the mandatory attendance of all coaches to monthly coaches meetings.
   a) Coaches are required to attend compliance education per the updated MSU Personnel Policies (Bylaw 11) policy. Monthly Coach Compliance Education attendance is also required per the MSU NCAA Compliance Education Program, which has been in effect since Summer 2006.
   b) Summer 2006

51) Corrective Action 51: Have different presenters for rules education depending on the topic at hand (financial aid office presenting on financial aid rules, etc.). Require coaches who have a violation of a Bylaw to present rules education to the rest of the coaches on that particular rule.
   a) In the Fall of 2010, the compliance office started using Case Studies as part of the Monthly Compliance Education meetings. Case Studies typically require the coaches to present on their case study and discuss findings with all in attendance.
   b) Fall 2010

52) Corrective Action 52: Allocate more resources to the Compliance Office.
   a) In the summer of 2010, a half-time position (half of a full-time business office position) was allocated to Compliance to assist with daily responsibilities and documentation/reporting.
   b) Summer 2010

53) Corrective Action 53: Create an APP Team that meets to discuss the Academic Performance Program regularly to ensure that Montana State is meeting its stated goals.
   a) APR policies were written and approved by the UAC in December 2010. The committee will be established in the Spring 2011. With the adoption of written APR policies, the team will be formalized and will meet regularly to discuss APR issues.
   b) Spring 2011
54) Corrective Action 54: Policies and procedures pertaining to the APP program should be documented and provided in department manuals.
   a) The policy was approved by the UAC in December of 2010. The policy is available on msubobcats.com.
   b) Fall 2010

55) Corrective Action 55: APR and GSR data should be subject to internal audit by the institution.
   a) MSU Internal Audit (IA) develops a risk-based engagement plan at least annually to determine its priorities. IA intends to include the Athletics Compliance program in its engagement plan development process beginning fiscal year 2012 and will conduct work in this area as determined by this process.
   b) FY 2012

56) Corrective Action 56: Policies and procedures for calculating and submitting APR and GSR should be reviewed and evaluated for effectiveness regularly.
   a) MSU Internal Audit (IA) develops a risk-based engagement plan at least annually to determine its priorities. IA intends to include the Athletics Compliance program in its engagement plan development process beginning fiscal year 2012 and will conduct work in this area as determined by this process.
   b) FY 2012

57) Corrective Action 57: Create a system to ensure that all forms are completed and submitted on time.
   a) The new half-time compliance position has been assigned this task. In the summer of 2010 she was new to compliance responsibilities and started to track that all forms were completed and submitted in a timely manner.
   b) Summer 2010

58) Corrective Action 58: Involve other entities on campus (ex.: business office) in monitoring camps and clinics.
   a) MSU Internal Audit (IA) develops a risk-based engagement plan at least annually to determine its priorities. IA intends to include the Athletics Compliance program in its engagement plan development process beginning fiscal year 2012 and will conduct work in this area as determined by this process.
   b) FY 2012

   a) MSU Internal Audit (IA) develops a risk-based engagement plan at least annually to determine its priorities. IA intends to include the Athletics Compliance program in its engagement plan development process beginning fiscal year 2012 and will conduct work in this area as determined by this process.
   b) FY 2012

60) Corrective Action 60: All extra-benefits and awards policies must be documented and approved in writing.
   a) The Awards & Extra Benefits Policies & Procedures were approved by the UAC in December 2010.
   b) Fall 2010
61) Corrective Action 61: The Student-Athlete Opportunity Fund guidelines should be made available to student-athletes and coaches. Currently, there is only a request form.
   a) The SA Handbook contains a statement about availability of SAOF for student-athletes.
   b) Summer 2009

62) Corrective Action 62: Establish documented procedures for monitoring individual skill instruction time limitations and ensure that the instruction is at the request of the student-athlete.
   a) These policies are being developed and will be drafted during the Spring of 2011.
   b) Spring 2011

63) Corrective Action 63: Document policies and procedures used to monitor daily and weekly hour limitations during and outside the playing season.
   a) This can be found in the MSU Playing and Practice Season Policies adopted in the Fall of 2010.
   b) Fall 2010

64) Corrective Action 64: Document policies and procedures used to monitor missed class time for competition and practice activities.
   a) This can be found in the MSU Playing and Practice Season Policies adopted in the Fall of 2010.
   b) Fall 2010

65) Corrective Action 65: Establish documented procedures for monitoring summer workout activities according to each individual sport in Bylaw 17.
   a) This can be found in the MSU Playing and Practice Season Policies adopted in the Fall of 2010.
   b) Fall 2010

66) Corrective Action 66: Develop policies and procedures to monitor work performed by student-athletes on and off-campus to ensure that earnings are for work actually performed and at a rate commensurate with the going rate in that locality for similar services.
   a) This was implemented this academic year, but was found to be too burdensome, so MSU plans to change how student work is monitored annually. The policy can be found online: Awards and Extra Benefits Policies and Procedures.
   b) Fall 2010

67) Corrective Action 67: Develop procedures to monitor any employment during the academic year and vacation period in which a student-athlete obtains employment with a representative of athletics interests.
   a) This has been implemented this academic year, but was found to be too burdensome, so MSU plans to change how student work is monitored annually. The policy can be found in the Awards and Extra Benefits Policies and Procedures.
   b) Fall 2010

68) Corrective Action 68: Monitor the out-of-season participation of enrolled student-athletes on outside, amateur teams.
   a) Written amateurism policies will be adopted in the Spring 2011 and will include this topic.
   b) Spring 2011

69) Corrective Action 69: Meet with all teams at the end of each season to discuss amateurism issues and other compliance related topics.
   a) This was done for the first time last spring. It is required per the new MSU Playing and Practice Season Policies adopted in the Fall of 2010. The policy says, “OUTSIDE
COMPETITION The head coach of each team, in cooperation with the compliance office, is responsible for scheduling a compliance meeting with the team to discuss outside teams and summer activities. This meeting must be conducted during the second semester and prior to the end of each academic year.”

b) Fall 2010

70) Corrective Action 70: Create an Athletics Senator position in the ASMSU Senate to represent the interests and needs of the student-athlete population.
   a) Currently, the ASMSU President is a former student-athlete. Once his term expires, we will develop a strategy to meet this goal.
   b) AY 2012

71) Corrective Action 71: Advise student-athletes on which professors on campus do not accept “excused” absences for competition. Encourage student-athletes to report such professors to the FAR.
   a) This topic has been discussed by the FAR with the President and at Assistant Dean’s Council during the Fall 2010 semester. In exit interviews, most students do not report issues on this subject. A limited few do. Students are encouraged to report these incidents to the Athletic Academic Center or the per the Student-Athlete Handbook.
   b) Fall 2010

72) Corrective Action 72: Create an "Early Registration" option for student-athletes.
   a) This was adopted and implemented for registration in the spring of 2010 for classes for the fall of 2010.
   b) Spring 2010

1.2.16. Submit a copy of the report from the institution’s most recent rules compliance evaluation.

Measurable Standard No. 14
The institution must submit a copy of the written evaluation from its comprehensive, external rules-compliance evaluation.

Posted to the report webpage: Document for submission 1.2.16
http://www.montana.edu/opa/ncaacert_2010/report/

1.2.17. If the institution has developed a plan(s) for improvement during the current self-study process for Operating Principle 1.2, describe the institution’s efforts to ensure the plan(s) for improvement was developed through a process involving broad-based participation and has received formal institutional approval.

Working to identify improvement needs.