Item 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 for certification” were imposed by the committee in its Cycle 2 certification decision as related to Operating Principle 1.2 (Rules Compliance).

Item 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 noncompletion of the original goal(s) and/or step(s) to achieve the goal.

The University of Montana (UM) developed one plan for improvement during its Cycle 2 certification process for Operating Principle 1.2 (Rules Compliance) which was fully implemented by January 2004. The issue addressed was whether student athletes who transfer to UM at midyear (spring semester) are given adequate orientation regarding rules compliance. The original goal was to develop and implement a specific plan that insures student-athletes who transfer to UM at the beginning of spring semester are given adequate orientation regarding rules compliance.
The steps taken to achieve the goal and completion dates are as follows:

1. The Senior Associate Athletic Director (SAAD), who is responsible for compliance, initiated the process to complete the plan (January 2004).
2. The resulting plan was completed and presented to the Athletic Director, then
3. UM’s NCAA Faculty Athletic Representative reviewed the plan, and
4. The plan was implemented in January 2004.

Accordingly, adequate orientation regarding rules compliance for student-athletes who transfer to UM at midyear is now accomplished on an individual basis. Each transfer student must meet with the SAAD and complete the required NCAA paperwork. During that meeting, the SAAD also reviews with him/her the student-athlete handbook, which includes the student-athlete conduct code, Big Sky Conference fact sheet, and NCAA Summary of Regulations.

**Item 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);
b. The step(s) taken by the institution to achieve the goal(s); and
c. The date(s) the step(s) was completed.

The University of Montana (UM) developed one additional plan for improvement since the Cycle 2 certification decision was rendered for Operating Principle 1.2, Rules Compliance, which was completed as of August 2008. The Intercollegiate Athletics (IA) Department determined that additional help was needed to assist with the day-to-day responsibilities of rules compliance. The original goal was to hire a part-time Compliance Assistant for the Senior Associate Athletic Director (SAAD), who holds responsibility for compliance, to address this.

The steps taken to achieve the original goal and completion date were as follows:

1. The SAAD developed the position description, obtained approval for same and the funding approval (August 2008);
2. Completed the regular recruitment and hiring process required through and in conjunction with UM Human Resource Services; and
3. Hired a half-time Compliance Assistant, who commenced work in August 2008.

The original goal was accomplished in August 2008, but the position will increase to full time in August 2011 as a result of further increases in the workload.
**Item 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.

The University of Montana (UM) is in compliance, except for item (c); a plan for improvement is included to address the deficiencies.

The University of Montana (UM) has four classifications of employees, applicable to all campus units including the Department of Intercollegiate Athletics (IA): Administrator, Contract Professional, Classified Staff, and Student/Temporary. All administrators, contract professionals and classified staff are required annually to sign a “Certification of Compliance for Staff Members,” in accordance with NCAA Bylaw 18.4.2, indicating they are aware of and will abide by all NCAA rules. The University does not require any of the employment-related documents indicated above for Student/Temporary employees because those employees are typically transient in nature and not involved in activities requiring NCAA rules compliance knowledge. However, IA currently has one temporary employee who does have NCAA rules compliance responsibilities; while that employee does not have a contract or letter of appointment, he does have a role description addendum as discussed below in Item 4(b).

**a. Contracts or letters of appointment**

Only administrators and contract professionals have contracts or letters of appointment. As with all other UM departments, classified staff employees do not have contracts or letters of appointment.

Contracts or letters of appointment for administrators and contract professionals other than coaches include the following language regarding the importance of rules compliance:

> “Athletic Department employees and those University employees outside the Athletic Department with NCAA rules compliance responsibilities are subject at all times to NCAA Bylaws 10.1 and 11.1 regarding ethical conduct and the responsibility to positively contribute to a campus culture of NCAA rules compliance. Failure to conduct oneself as such will result in disciplinary or corrective action up to and including immediate discharge.”

See SS Item 4 (a) – Contract Professionals Contracts in the document archive.

Contracts for all coaches include the following language regarding the importance of rules compliance:

> “Employee is responsible for acquiring and maintaining direct knowledge of the applicable constitutions, bylaws, rules, policies, interpretations and regulations of the NCAA, the Big Sky Conference and the University.

> “Employee shall act at all times in accordance with and fully comply with the laws, regulations, rules and guidelines of the United States, State of Montana, UM, the Big Sky Conference, NCAA and in a
manner that reflects positively on the image and reputation of UM. Failure to conduct him/herself in full compliance with these laws, regulations, rules and guidelines may result in disciplinary or corrective actions may be appropriate in light of the severity of the conduct.”

“Employee acknowledges review of the conduct requirements for Athletics personnel in NCAA Bylaw 11.1 and agrees to comply with all NCAA bylaws, including the bylaws related to conduct.”

See SS Item 4 (a) files re: Coaches contracts, SS Item 4(a) – Remaining Coach Contracts, and SS Item 4(a) – Remaining Coach Contracts 2 in the document archive.

b. Job Descriptions

The job descriptions (or role descriptions as they are called on this campus) for the administrators, all contract professionals (except coaches), and all classified staff were reviewed and amended to include the following language where necessary:

“Athletic Department employees and those University employees outside the Athletic Department with NCAA rules compliance responsibilities are subject at all times to NCAA Bylaws 10.1 and 11.1 regarding ethical conduct and the responsibility to positively contribute to a campus culture of NCAA rules compliance. Failure to conduct oneself as such will result in disciplinary or corrective action up to and including immediate discharge.”

See SS Item 4 (b) and 5(b) – Addendums to Classified Role Descriptions and SS Item 4(b) and 5(b) – Addendums to Contract Professional Role Descriptions in the document archive.

The job descriptions for contract professionals who are head or assistant coaches were reviewed and amended to include the following language where necessary:

“The Head Coach (or assistant coach) is responsible to:
1. Promote an atmosphere for compliance within the program supervised by the coach and to monitor the activities regarding compliance of all assistant coaches and other administrators involved with the program who report directly or indirectly to the coach (NCAA Bylaw 11.1.2.1).”

See SS Item 4 (b) Coaches job description in the document archive.

c. Performance Evaluations

The department’s policies and procedures manual – Grizzly Athletics Policies and Procedures – specifies that all IA personnel will have annual written performance evaluations, with copies retained in the departmental personnel files. Our review revealed that the performance evaluations did not include a rules compliance component. In addition, IA was unable to produce copies of performance evaluations for previous coaching staff that had left UM. A Plan for Improvement is included to address this deficiency.

Plan for Improvement
Operating Principle 1.2 – Item 4 (c)

<table>
<thead>
<tr>
<th>ELEMENT</th>
<th>GOAL</th>
<th>STEPS TO ACHIEVE GOAL</th>
</tr>
</thead>
<tbody>
<tr>
<td>Issue</td>
<td>Measurable Goal(s)</td>
<td>Steps to Achieve Goal</td>
</tr>
</tbody>
</table>

NCAA Self-Study – Campus Review Draft
Operating Principle 1.2 – Rules Compliance
| The performance evaluations for all Intercollegiate Athletics (IA) administrators, contract professionals (except coaches), and classified staff who are regularly evaluated do not include a statement addressing the importance of rules compliance. | The performance evaluations for all IA administrators, contract professionals (except coaches), and classified staff who are regularly evaluated must include a statement addressing the importance of rules compliance. Revise applicable performance evaluation forms for IA employees who are regularly evaluated (administrators, contract professionals except coaches, and classified staff) to include a statement addressing commitment to rules compliance. Use revised forms when performing next cycle of evaluations (for FY 2011). | Jean Gee, Senior Associate Athletic Director | Performance Evaluation forms for Contract Professionals (coaches and non-coaches) have been revised. See SS Item 4 (c) – Performance Evaluation Form Coaches and SS Item 4 (c) – Performance Evaluation Form Contract Professionals in document archive. Performance evaluation forms for Classified Staff have been revised. See SS Item 4 (c) and 5(c) - Performance Evaluation Form Classified in document archive. Revised forms will be used for FY 11 evaluations. All should be completed by August 2011. |

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**NCAA Self-Study – Campus Review Draft**  
**Operating Principle 1.2 – Rules Compliance**  
**Page 5**
Item 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.

The University of Montana is in compliance, except for item (c); a plan for improvement is included to address the deficiencies.

We reviewed contracts or letters of appointment, job descriptions and position announcements, and performance evaluations for five University of Montana (UM) positions that are outside Intercollegiate Athletics (IA) but are involved or associated with IA. These include: the Registrar, Director of Financial Aid, and Assistant Vice President for Enrollment Services (all of whom are contract professionals) and two classified staff.

   a. Contracts or letters of appointment.

      The contracts for the three contract professionals indicated include statements regarding the importance of NCAA rules compliance. See SS Item 5 (a) – Outside IA Contracts in the document archive.

      UM does not require classified staff to sign contracts.

   b. Job Descriptions.

      The job descriptions (or role descriptions as they are called on this campus) for the three contract professionals and the two classified staff were reviewed and amended to include the following language where necessary:

      “Athletic Department employees and those University employees outside the Athletic Department with NCAA rules compliance responsibilities are subject at all times to NCAA Bylaws 10.1 and 11.1 regarding ethical conduct and the responsibility to positively contribute to a campus culture of NCAA rules compliance. Failure to conduct oneself as such will result in disciplinary or corrective action up to and including immediate discharge.”; or

      “The {INSERT TITLE OF CONTRACT PROFESSIONAL} is bound by NCAA Bylaws 10.1 and 11.1 regarding ethical conduct and the responsibility to positively contribute to a campus culture of NCAA rules compliance.”

      See SS Item 5 (b) – Contract Job Description – Liston, SS Item 5 (b) – Contract Job Description - McGowan and SS Item 5 (b) – Johnson, and SS Item 5 (b) – Role Addendum – Registrar in the document archive.
c. **Performance Evaluations.**

Our review revealed that none of the performance evaluations included a rules compliance component. A Plan for Improvement is included to address this deficiency.

The performance evaluation form for classified staff has been revised to include a job success element addressing compliance with NCAA rules and regulations. See *SS Item 4(c) and 5(c) – Performance Evaluation Form Classified* in the document archive.

### Plan for Improvement

**Operating Principle 1.2 – Item 5 (c)**

<table>
<thead>
<tr>
<th>ELEMENT</th>
<th>GOAL</th>
<th>STEPS TO ACHIEVE GOAL</th>
<th>Individuals or Officers Responsible for Implementation</th>
<th>Specific Timetable for Completing Work</th>
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<tbody>
<tr>
<td>Issue</td>
<td>Measurable Goal(s)</td>
<td>Steps to Achieve Goal</td>
<td>Jean Gee, Senior Associate Athletic Director</td>
<td>Performance evaluation forms for Classified Staff have been revised. See <em>SS Item 4(c) and 5(c) – Performance Evaluation Form Classified</em> in document archive.</td>
</tr>
<tr>
<td></td>
<td>The performance evaluations for UM employees outside Intercollegiate Athletics (IA) with rules compliance responsibility and/or associated with IA do not include a statement addressing the importance of rules compliance as part of the evaluation.</td>
<td>Revise applicable evaluation forms for UM employees to include criteria for commitment to rules compliance. Use forms when performing next cycle of evaluations. Modify evaluation process to include input from IA personnel regarding rules compliance criteria.</td>
<td>HRS Director; and applicable director/supervisor</td>
<td>Revise process and begin use for FY 2011 evaluations. All should be completed by August 2011.</td>
</tr>
</tbody>
</table>
Item 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.

The following hold ultimate authority for their respective areas for The University of Montana:

Admissions – Jed Liston, Assistant Vice President for Enrollment Services
Certification of academic standing and conferment of academic degrees – Ed Johnson, Registrar

Item 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., athletics director, vice president for athletics).

Jim O’Day, Director of Intercollegiate Athletics

Item 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, and 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).

The University is in compliance.

The Department of Intercollegiate Athletics (IA) of The University of Montana (UM) strongly supports the principle of institutional control of its intercollegiate athletics program. All persons associated with the conduct of the intercollegiate athletics program are responsible for fostering a culture of rules compliance by carrying out their duties in accordance with NCAA, Big Sky Conference, and UM and Montana University System (MUS) rules and regulations.
The President of the University is ultimately responsible for the institution’s complying with NCAA rules and regulations. This is achieved in practice through the Senior Associate Athletic Director (SAAD), who is responsible for the day-to-day oversight of the institution’s athletic compliance activities and program, and through the University’s NCAA Faculty Athletic Representative (FAR) who is responsible for compliance with academic regulations.

Among the individuals who have responsibilities for the University’s compliance activities and program are the following. The comments that accompany each individual are not intended to be all-inclusive. Rather, they serve to provide a summary of the individual’s key responsibilities for or involvement in the University’s rules compliance program.

**Inside the Department of Intercollegiate Athletics**

**Director of Intercollegiate Athletics:** Is the senior administrative official within IA who is responsible for and “sets the tone” regarding the importance to be placed on rule compliance by all IA employees. Reports directly to the President of the University.

**Senior Associate Athletic Director (SAAD):** The SAAD is the senior woman administrator and second-most senior administrative official within the department. Among her several areas of administrative responsibility and oversight is the department’s compliance program. Rules compliance responsibilities assigned to this position include the following: eligibility certification (initial, continuing and transfer); monitoring of financial aid; NCAA Division I Academic Performance Program; recruiting; camps and clinics; investigations and self-reporting of rules violations; rules education; extra benefits; playing and practice seasons; student-athlete employment; and amateurism. Reports directly to the Athletic Director. Reports concurrently to the Faculty Athletic Representative (FAR) on NCAA rules violations, academic certifications, and all other compliance issues.

**Compliance Assistant:** Responsible for rules education activities. Reports directly to the SAAD.

**Coordinator of Athletic Academic Services (CAAS):** Monitors student-athletes’ grade point average and enrollment to ensure that all eligible student-athletes are enrolled in at least twelve credit hours and meet the minimum GPA requirement for practice and competition. Also assists the FAR in certifying the eligibility of all student-athletes for practice and certification. Reports directly to the SAAD.

**Athletic Academic Advisor:** Assists with initial eligibility certification, continuing eligibility certification, and transfer-eligibility certification. Reports directly to the CAAS.

**Coaching Staff:** Coaches interact on the closest level with the student-athletes and are responsible for communicating with the SAAD concerning any observed rules compliance issues.

**Outside Department of Athletics**

**NCAA Faculty Athletic Representative (FAR):** This individual is from outside the department and is appointed by the UM President to represent the institution and its faculty in the institution’s relationships with the NCAA and the Big Sky Conference. Among the FAR’s responsibilities in the compliance program is the administration of the annual NCAA coaches recruiting examination, assisting with investigations of rules.
violations and reporting same to the NCAA and/or Big Sky Conference, certifying the eligibility of all student-athletes for practice and competition, and scholarships. Reports directly to the President of the University.

**Assistant Vice President for Enrollment**: Ensures that all student-athletes are admitted to UM in accordance with established MUS and UM admissions policies and procedures. Reports directly to the UM Vice President for Student Affairs.

**Director of Financial Aid**: In conjunction with the SAAD, ensures that all institutional financial aid and outside financial aid is properly administered to student-athletes. Reports directly to the Assistant Vice President for Enrollment.

**Athletic Liaison in the Financial Aid Office**: Assists in monitoring financial aid administration for student-athletes. Responsible for entering student-athlete scholarship funding into student’s accounts. Reports directly to the Director of Financial Aid.

**Registrar**: With the FAR, prepares the eligibility certificates that document all student-athletes who are eligible for practice and competition. Reports directly to the UM Provost.

**Certification Officer in Registrar’s Office**: In coordination with the FAR and CAAS, works to ensure accuracy and completeness of initial eligibility certification, continuing eligibility certification, and transfer eligibility certification. Prepares eligibility certificates. Reports directly to the Registrar.
Item 9.

Indicate (with “yes” or “no”) 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.

- Initial eligibility certification. YES
- Continuing-eligibility certification. YES
- Transfer-eligibility certification. YES
- APP. YES
- Financial aid administration. YES
- Recruiting. YES
- Camps and clinics. YES
- Investigations and self-reporting of rules violations. YES
- Rules education. YES
- Extra benefits. YES
- Playing and practice seasons. YES
- Student-athlete employment. YES
- Amateurism. YES

The University of Montana is in full compliance with all items in Self-Study Item 9.

Three current Department of Intercollegiate Athletics (IA) documents provide evidence confirming written policies and the step-by-step procedures for rules compliance:

- the compliance manual – Grizzly Athletics Compliance Policies & Procedures (2010);
- the departmental procedures manual – Grizzly Athletics Departmental Policies & Procedures (November 2010); and

The corresponding sections of each of the above documents are intentionally organized similarly, to ensure systematic implementation of established policies and procedures for rules compliance. The three documents referenced above are currently available in the document archive and will be available for the NCAA site visit team.

a. Initial eligibility certification. The University has clearly delineated steps for initial eligibility certification, presented in the compliance manual (pdf page 20) and the departmental procedures manual (pdf page 71). Persons responsible include Senior Associate Athletic Director (SAAD), who is responsible for athletics compliance; the IA Academic Advisor; the NCAA Faculty Athletic Representative (FAR); and the athletics certification specialist in the Registrar’s Office.

b. Continuing-eligibility certification. The University has clearly delineated steps for continuing-eligibility certification, which are presented in the compliance manual (pdf page 21) and the departmental procedures manual (pdf page 72). Persons responsible include the Senior Associate Athletic Director, who is
responsible for compliance; the CAAS; the IA Academic Advisor; the Faculty Athletic Representative; and the Certification Officer in the Registrar’s Office.

c. **Transfer-eligibility certification.** The University has clearly delineated steps for transfer-eligibility certification addressed in the compliance manual (pdf page 20) and the departmental procedures manual (pdf page 72). Persons responsible include the Senior Associate Athletic Director, who is responsible for compliance; the CAAS; the IA Academic Advisor; the Faculty Athletic Representative; and Certification Officer in Registrar’s Office.

d. **APP.** The University has clearly delineated steps for the NCAA Athletic Performance Program (APP), addressed in the compliance manual (pdf page 24). Persons responsible include the Senior Associate Athletic Director, who is responsible for compliance; the IA Academic Advisor; and the Coordinator of Athletic Academic Services.

e. **Financial aid administration.** The Financial Aid Office has written policies and step-by-step procedures that include assignment of specific responsibilities pertaining to athletic rules compliance. See the financial aid administration policy and procedures in the compliance manual (pdf page 29) and the departmental procedures manual (pdf page 76). Persons responsible include the Senior Associate Athletic Director, who is responsible for compliance, the Director of Financial Aid, and the Financial Aid Office Athletics Liaison.

f. **Recruiting.** The University has clearly delineated steps for recruiting activities addressed extensively in the current the compliance manual (starting at pdf page 38), the departmental procedures manual (starting at pdf page 53), and the student-athlete handbook (starting page 73). These documents address permissible recruiting activities (what is and is not allowed), recruiting core values, the role of Recruiting Advisory Board, and so on. Persons responsible include the coaching staff and the Senior Associate Athletic Director, who is responsible for compliance.

g. **Camps and clinics.** The University has clearly delineated steps for the operation of Camps and Clinics presented in the compliance manual (pdf page 32, 46-52 and the departmental procedures manual (starting at pdf page 59). Persons responsible include coaching staff and the Senior Associate Athletic Director, who is responsible for compliance.

h. **Investigations and self-reporting of rules violations.** The University has clear and comprehensive policies and procedures for investigations and self-reporting of rules violations. See the compliance manual (pdf page 17). Persons responsible include UM President (appoints Legal Advisor for investigations of major violations), the Senior Associate Athletic Director, who is responsible for compliance; the Athletic Director; and the Faculty Athletic Representative.

i. **Rules education.** The University has clearly delineated steps for rules education. See the compliance manual (pdf page 23). The departmental procedures manual contains a “NCAA Rules and Regulations: A Guide for Family and Friends” (starting at pdf page 63). The persons responsible for rules education include the Senior Associate Athletic Director, who is responsible for compliance, and the Compliance Assistant.

j. **Extra benefits.** The University has clearly delineated steps for extra benefits. See the compliance manual (pdf pages 22 and 32); all forms under Student-Athlete Employment and Promotional Activities; and the student-athlete handbook (throughout); and multiple forms/documents covering student employment (Student Athlete/Employer Form, Monetary Awards Summary Form, Student Athlete Employer Agreement Form).
Persons responsible include the Senior Associate Athletic Director, who is responsible for compliance, and the coaching staff.

k. Playing and practice seasons. The University has clearly delineated steps for playing and practice seasons, which are covered in the compliance manual (pdf page 25). Persons responsible include the Senior Associate Athletic Director, who is responsible for compliance, and the coaching staff.

l. Student-athlete employment. The University has clearly delineated steps for Student-athlete employment. See the compliance manual (pdf page 24) and the student-athlete handbook (page 20 & 72). Multiple forms and documents cover student-athlete employment (the Student Athlete/Employee Form, the Monetary Awards Summary Form, and the Student Athlete Employer Agreement Form). Persons responsible include Senior Associate Athletic Director, who is responsible for compliance, and the coaching staff.

m. Amateurism. The University has clearly delineated policies, procedures, and responsibilities regarding amateurism. See the compliance manual (pdf page 19) and the student-athlete handbook (page 16 & 19). Persons responsible include the Senior Associate Athletic Director, who is responsible for compliance, and the coaching staff.
**Item 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.

The University of Montana is in full compliance.

The University of Montana (UM) Department of Intercollegiate Athletics (IA) uses a variety of communication strategies to foster communication and understanding of compliance policies and procedures. The *Grizzly Athletics Compliance Policies & Procedures* manual, the *Grizzly Athletics Departmental Policies & Procedures* manual, and the *Grizzly Athletics Student-Athlete Handbook*, all updated annually, provide the foundation for the various communication efforts.

**Student-Athletes:** Regular communication to the student-athletes is primarily through the “Student Athlete Newsletter,” distributed monthly during the academic year. It is distributed electronically, but in a format that can also be saved and printed as hard copy should the student wish to do so. Several of the more recent issues of the “Student Athlete Newsletter” are in the document archive and will be available for the NCAA site visit team.

**Athletic Department staff:** The Senior Associate Athletic Director (SAAD) disseminates a monthly newsletter – “Paws for Compliance” – by hardcopy and e-mail to all the IA staff. The staff also receive staff education guidelines (updated annually) summarizing rules and regulations commonly dealt with in various issue areas and at special times of the year, such as in marketing, business office, training center, equipment, ticket office, etc. Several of the more recent issues of the “Paws for Compliance” newsletter are currently on the UM NCAA secure website and will be available for the NCAA site visit team. In addition, rules education pieces addressing compliance issues for various functional areas – Academic, Business Office, Strength and Conditioning, Ticket Office, etc. – are also provided periodically. Several recent examples are in the document archive and will be available for the NCAA site visit team.

**Coaches:** Coaches receive the “Paws for Compliance” newsletter distributed monthly by the SAAD. The SAAD also communicates with them periodically, by email to provide information regarding the IA’s written policies and procedures, including links to the current editions of the *Grizzly Athletics Compliance Policies & Procedures* manual, the *Grizzly Athletics Departmental Policies & Procedures* manual, and the *Grizzly Athletics Student-Athlete Handbook*.

**Faculty:** IA reports annually to the UM faculty, through their elected Faculty Senate, by means of the “The Annual Report on Intercollegiate Athletics to the Faculty Senate.” The report is presented at a Faculty Senate meeting jointly by the Athletic Director, the SAAD, and the Faculty Athletic Representative. This annual report reviews generally the IA policies and practices and any changes, and addresses the academic progress of current student-athletes, rules compliance infractions, and other critical issues. The latest annual report is in the document archive and will be available for the NCAA site visit team.

**Institutional staff outside the Department of Intercollegiate Athletics:** Institutional staff members outside the Department of Intercollegiate Athletics who are involved or associated with athletics receive information from the Department concerning rules compliance policies and procedures by means of the emailed monthly compliance newsletter “Paws for Compliance” and a weekly email, entitled “Compliance Tip of the Week.” Several of the more current “Compliance Tip of the Week” issues, along with the “Paws” newsletters, are available on the UM NCAA secure website and will be available for the NCAA site visit team.
Collectively, these various efforts and products provide ongoing and effective communication regarding compliance policies and procedures.

**Item 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.

The University of Montana is in full compliance with Self Study Item 11, except for item “e” below regarding rules education for Faculty.

The Department of Intercollegiate Athletics (IA) of The University of Montana (UM) has developed and implemented a comprehensive approach to rules education designed to ensure a thorough understanding of compliance rules and regulations. The Department has created a variety of educational products designed for distinct groups—boosters, student-athletes, Department of Intercollegiate Athletics staff and coaches, and UM staff outside the IA. These documents provide conclusive evidence of the IA’s commitment to proactive implementation of rules education.

**a. Boosters**

Booster and community groups receive several communications regularly from the University emphasizing rules compliance. These include:

- **Grizzly Scholarship Association (GSA) Newsletter – the GrizGram.** The GrizGram regularly includes the “UM Compliance Corner” with compliance information on a variety of topics, such as extra benefits, recruiting, student-athlete employment, using a student-athlete’s name or picture, etc. GrizGram is disseminated on a bi-annual schedule, either mailed to GSA members via US Mail or distributed by e-mail. A copy of the Fall 2009 GrizGram and will be available for the NCAA site visit team. See *SS Item 11 (a) – GSA Newsletter* in the document archive.

- **Ticket Stuffers.** These are various items—such as definition of booster, selected “Do’s & Don’ts,” and so on—included as a mail insert to season ticket holders with their season tickets. They are distributed three times a year, for football and men’s and women’s basketball. A copy of the May 2010 Ticket Stuffer will be available for the NCAA site visit team. See *SS Item 11 (a) – Ticket Stuffer* in the document archive.

- **Chamber of Commerce Letter.** Each year the Senior Associate Athletic Director provides a letter to the Missoula Chamber of Commerce which, in turn, electronically sends the letter to its members that addresses pertinent athletics compliance issues, including student-athlete employment, extra benefits, using a student-athlete’s name or picture, etc. A copy of the standardized letter to Chamber of Commerce members will be available for the NCAA site visit team. See *SS Item 11 (a) – Chamber of Commerce Letter* in the document archive.
b. **Student-Athletes**

Student-Athletes also receive several communications from the IA emphasizing rules compliance. These include:

- **Griz Compliance Corner (Student-Athlete E-Newsletter)** – This electronic newsletter, distributed monthly during the academic year, goes to every student-athlete and addresses a variety of compliance topics, often relevant to the season (e.g., sports wagering during March Madness). A copy of several of these Griz Compliance Corner newsletters will be available for the NCAA site visit team. See *SS Item 11 (b) – Griz Compliance Newsletters Sept 2009 – October 2010* in the document archive.

- **New Student-Athlete Seminar** – Each fall, as part of the two-credit “New Student-Athlete Seminar” for freshmen student-athletes, IA staff present a major segment, with handouts, on the compliance rules, addressing extra benefits, sports wagering, public appearances, social networking, and the like. A copy of the presentation will be available for the NCAA site visit team. See *SS Item 11 (b) – New Student Athlete Seminar* in the document archive.

- **Student-Athlete Year-End Meeting Handout** – Near the end of each spring semester, IA holds a meeting with all continuing student-athletes and provides them with appropriate handouts, addressing compliance topics relevant to summer employment, leagues, camps, outside competition, amateurism, and the like. A copy of the Year-End Meeting Handout will be available for the NCAA site visit team. See *SS Item 11 (b) – Student Athlete Year End Meeting Handout* in the document archive.

- **Student-Athlete Employer Letter** – Upon notification from a student-athlete that he/she has obtained employment, the IA Compliance Assistant mails to the employer the Student-Athlete Employer letter (from the SAAD), which addresses the rules pertaining to student-athlete compensation, promotion, and extra benefits. That letter includes the Student-Athlete/Employer Agreement form which the employer is instructed to sign and return to the SAAD. Copies of the Student-Athlete Employer letter and Student-Athlete/Employer Agreement Form will be available for the NCAA site visit team. See *SS Item 11 (b) – Student Athlete Employer Contract* and *SS Item 11 (b) – Student Athlete Employer Letter* in the document archive.

c. **Department of Intercollegiate Athletics Staff**

The department staff receive at least three different communications regarding rules compliance, each disseminated monthly, weekly or annually.

- **“Paws for Compliance” Newsletter** – A monthly electronic newsletter distributed to all staff and covering a variety of compliance topics. See *SS Item 11 (c), (d), and (f) – Paws for Compliance Newsletters April 2009 – October 2010* in the document archive.

- **Compliance Tip of the Week** – A weekly email to all staff, addressing a variety of compliance topics. See *SS Item 11 (c), (d), and (f) – Compliance Tip of the Week – May 2010 – October 2010* in the document archive.

- **Staff Education Guidelines** – Documents created specifically for each IA division (marketing, business office, training center, equipment, ticket office, etc.) that summarize rules and regulations commonly dealt with in that area. The documents are updated annually and distributed via email to staff of each respective division. See *SS Item 11 (c) – Staff Education Guidelines* in the document archive.

d. **Coaches**
• **“Paws for Compliance” Newsletter** – Is a monthly electronic newsletter distributed to all staff, including coaches, and covering a variety of compliance topics. See *SS Item 11 (c), (d), and (f) – Paws for Compliance Newsletters April 2009 – October 2010* in the document archive.

• **Compliance Tip of the Week** – Is a weekly email to all staff, including all coaches that addresses a variety of compliance topics. See *SS Item 11 (c), (d), and (f) – Compliance Tip of the Week – May 2010 – October 2010* in the document archive.

• **Annual Legislative Education** – The Senior Associate Athletic Director, who is responsible for compliance, regularly sends all IA staff emails with guidance on the latest rules interpretations and rule changes. She also meets one-on-one with coaching staff to convey new rules and rule interpretations and to provide guidance on the practical implementation of the rules.

e. **Faculty directly involved with athletics**

• The Senior Associate Athletic Director does not currently provide rules education for faculty who are directly involved with intercollegiate athletics at UM.

• A plan for improvement has been developed to address this issue (included below). The annual report to the Faculty Senate will include some “Do’s & Don’ts” compliance information, and this report will also be presented to the University Athletics Committee.

f. **Institutional staff outside the Department of Intercollegiate Athletics who are directly involved with athletics.**

• **“Paws for Compliance” Newsletter** – A monthly electronic newsletter distributed internally to cover a variety of compliance topics is also distributed to all institutional staff outside the department who are directly involved with athletics. See *SS Item 11 (c), (d), and (f) – Paws for Compliance Newsletters April 2009 – October 2010* in the document archive.

• **Compliance Tip of the Week** – A weekly email addressing a variety of compliance topics and is sent to all departmental staff is also disseminated to institutional staff outside the department who are also directly involved with athletics. See *SS Item 11 (c), (d), and (f) – Compliance Tip of the Week – May 2010 – October 2010* in the document archive.
### Suggested Plan for Improvement: Rules Education for Faculty

#### Plan for Improvement

**Operating Principal 1.2 – Item 11(e)**

<table>
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<tr>
<th>ELEMENT</th>
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<th>Individuals or Officers Responsible for Implementation</th>
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<tbody>
<tr>
<td>Issue</td>
<td>Measurable Goal(s)</td>
<td>Steps to Achieve Goal</td>
<td>Senior Associate Athletic Director (compliance coordinator); Faculty Athletics Representative</td>
<td>Implement for annual Faculty Senate meeting in Fall Semester 2011.</td>
</tr>
<tr>
<td>The Department of Intercollegiate Athletics does not provide compliance rules education for faculty directly involved with athletics.</td>
<td>Provide appropriate rules education to all faculty directly involved in athletics on an annual basis (at a minimum).</td>
<td>(1) During the annual IA report to UM Faculty Senate, expand the NCAA rules report to include some “do’s and don’ts.” (2) Present this report also to the University Athletics Committee.</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
**Item 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;

  **Response:** The Compliance Group, 8889 Bourgade Street, Lenexa, Kansas 66219

  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

  **Response:** The University of Montana is in full compliance.

  The University of Montana (UM) contracted with a private, independent consulting group that met two criteria – is outside the institution with complete independence from UM’s day-to-day compliance responsibilities, and is fully knowledgeable of NCAA legislation and rules compliance practices. The Department of Intercollegiate Athletics (IA) went through a limited solicitation process which included conferring with other schools to get recommendations for competent independent evaluators. This process was initiated by Jean Gee, Senior Associate Athletic Director. James Gibson, Assistant Athletic Director for Fiscal Operations, was responsible for the fiscal review. Gibson followed the procedures for ‘sole source’ contracting and prepared all the purchasing documents, which were then processed by the purchasing officer for the University. IA selected The Compliance Group, recommended and considered by a number of other college athletic departments consulted as the “gold standard” among compliance evaluators. The University and IA had had no prior relationship, contractual or otherwise, with the Compliance Group.

  c. Provide the date of the institution’s most recent rules compliance evaluation.

  **Response:** The draft report was sent to the University on March 15, 2010. UM’s responses were received by the evaluators September 27, 2010; and the final report was issued October 15, 2010.
Item 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. YES
b. Initial-eligibility certification. YES
c. Continuing-eligibility certification. YES
d. Transfer-eligibility certification. YES
e. APP. YES
f. Financial aid administration, including individual and team limits. YES
g. Recruiting (e.g., contacts and evaluations, official and unofficial visits). YES
h. Camps and clinics. YES
i. Investigations and self-reporting of rules violations. YES
j. Rules education. YES
k. Extra benefits. YES
l. Playing and practice seasons. YES
m. Student-athlete employment. YES
n. Amateurism. YES
o. Commitment of personnel to rules-compliance activities. YES

The University of Montana is in full compliance.

The external rules compliance evaluation report conducted by The Compliance Group concluded that UM has an effective compliance system (see page 29 of the report). The University of Montana reviewed the external rules-compliance evaluation report and, in conjunction with the Compliance Group, developed corrective actions in all areas (a through o) noted above. The SAAD immediately took steps to institute the suggested changes, and many of the suggested corrective actions have already been completed. The self-study subcommittee agreed with the course of action taken. This material is covered in detail in Self-Study Item 15.
**Item 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.

**Response:** The University is in full compliance with this requirement.

Two members of the Rules Compliance sub-committee, Greg Munro (UM faculty member) and David Paoli (community member) met with the SAAD (Jean Gee) in October and November 2010. Together, the three reviewed the most recent rules compliance evaluation to determine any necessary corrective actions. Claudia Denker, chair of the NCAA Certification 2011 (Cycle 3) Rules Compliance sub-committee, also met with the SAAD in December 2010 to review the steps taken by IA toward suggested corrective actions.

**Item 15.**

Identify any relevant corrective actions(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.

- 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.

**Response:** The University is compliance, except for items (c) and (o), for which a Plan for Improvement is provided.

- a. Governance and organization.

**Corrective Action:** Revise the memorandum of understanding (MOU) between The University of Montana (UM) and the Montana Grizzly Scholarship Association (MGSA) to refer to the importance of the MGSA operating within NCAA guidelines and include a statement referencing that MGSA staff members could be disciplined or terminated for violations of NCAA legislation.
Date: Completed January 21, 2011. See SS Item 15 (a) – GSA Memo of Understanding in the document archive.

Corrective Action: Ensure that the Senior Associate Athletic Director (SAAD) has a second reporting line outside of the athletics department. With responsibility for both compliance and the Athletic Academic Services (AAS) program – two programs that are critical to the integrity of the institution’s athletics department – it is important that an avenue exist for this position to formally discuss issues for which that person’s opinion may differ greatly from the immediate supervisor.

Date: Immediate as of the date of UM Responses, September 27, 2010. SAAD’s reporting line outside the IA is to the UM NCAA Faculty Athletic Representative. See SS Item 15(a) – IA Organizational Chart in the document archive. Will need to include a link/URL here to the document but outside the secure site.

b. Initial-eligibility certification. No corrective actions were suggested for this item, nor are any planned.

c. Continuing-eligibility certification.

Corrective Action: Ensure that the Registrar’s Office has written procedures concerning its role in the eligibility certification process. These procedures will not be lengthy and can be confined to one page.

Date: Completed May 21, 2010. See SS Item 15 (c) - Registrar Eligibility Certification Process in the document archive.

Corrective Action: Include in the Registrar’s job description the importance of adhering to NCAA legislation and the possibility of disciplinary action for violations of NCAA legislation.

Date: Completed March 1, 2011. See SS Item 5 (b) and 15 (c) - Role Addendum - Registrar in the document archive.

Corrective Action: Implement a process (i.e., “hold system”) that restricts a student-athlete from dropping a class unless a drop form has been signed by a representative of the athletics department’s AAS program. Employees in the Registrar’s Office should be instructed to prohibit a student-athlete from dropping a class unless the form has been signed by an appropriate representative from the athletics department.

Date: The institution is currently working with the Registrar’s Office to develop a hold system. The target date for full implementation is Fall Semester 2011. A plan for improvement addressing this issue is included below.

d. Transfer-eligibility certification.

The review and certification of transfer eligibility is a collaborative effort involving the SAAD, the FAR, and the AAS staff. This area was reviewed; however, no corrective actions were warranted.

e. Academic Performance Plan.

Corrective action: Regarding the process for determining the Academic Progress Rate (APR) for each team, ensure that a double check is provided rather than placing all responsibility on the SAAD.

Response: The Grizzly Athletics Compliance Policies & Procedures manual has been updated to reflect the role of the AAS staff to serve as a double check for data entry for the APR data. (Grizzly Athletics Compliance Policies & Procedures manual, pdf pages 24 - 26).
f. Financial aid administration, including individual and team limits.

**Corrective Action:** Ensure that the Financial Aid Office has written procedures concerning its role in the process of financial aid for student-athletes. These procedures will not be lengthy and can be confined to one page.

**Date:** Completed January 16, 2011. See SS Item 9(e) and 15 (f) – Financial Aid Administration in the document archive.

**Corrective Action:** Develop an automatic notification system in which an e-mail will be provided to the SAAD and the financial aid director when any planned change occurs in the financial aid package of a student-athlete flagged in the financial aid database. The award would then remain in pending status until approved by both the SAAD and the financial aid director. The proposed process was modified slightly. The SAAD submits a request twice weekly to the Information Technology office to run the financial aid report listing all student-athletes and their financial aid packages. The report is delivered via email to the SAAD. The SAAD and Compliance Assistant reviews the report and work with the Financial Aid Athletic Liaison to adjust financial aid packages as needed. (See full procedure in Grizzly Athletics Compliance Policies and Procedures Manual.)

**Date:** Completed February 25, 2010.

**Corrective Actions:** Require that copies of the signed agreements (National Letter of Intent [NLI] and financial aid agreement) be returned to the Financial Aid Office for official recordkeeping. Because NCAA legislation requires that the institutional agency making the financial aid award provide a written statement to each student-athlete regarding the specific details of their award, these documents will be retained by the Financial Aid Office. This also provides a check on the amount of aid indicated on the National Letter of Intent and the amount awarded.

**Date:** Corrective Action completed. UM updated the Grizzly Athletics Compliance Policies and Procedures manual to reflect this requirement (pdf pages 29 – 30).

g. Recruiting (e.g., contacts and evaluations, official and unofficial visits).

**Corrective Action:** Require coaches to submit a summary of their contact/evaluation activities along with each expense report so that the recruiting activities can be easily compared to the receipts submitted with those expense reports. As an alternative, require the compliance assistant to conduct periodic spot checks by comparing coaches’ monthly contact/evaluation summaries with a sample of expense reports to confirm that the information is consistent. If the contact and evaluation logs are submitted with the travel reimbursement forms, it may not be necessary to submit the contact and evaluation logs on a monthly basis.

The institution agreed with the alternative recommendation – to have the Compliance Assistant conduct periodic spot checks by comparing monthly contact/evaluation summaries with expense reports.

**Date:** Implemented February 17, 2011. See SS Item 15 (g) – Verifying Veracity of Recruiting Records in the document archive.

**Corrective Action:** Ensure that the compliance staff develops a means to check the veracity of the information included on coaches’ telephone logs. This would not be a comprehensive analysis of all telephone calls. Rather, it should be a spot-checking of a representative sample of information monthly to result in at least one coach for each sport being reviewed on an annual basis.
This review also would include reviewing coaches’ text messages by sampling whether recruits in each sport were sent text messages by the coaching staff. At a minimum, the same sample size of one coach per sport per year should be undertaken. Regarding the text messaging recommendation, we are still working with Verizon on a process by which we can more easily obtain text message records than the present cumbersome process.

**Date:** Implemented February 17, 2011. See SS Item 15 (g) – Verifying Veracity of Recruiting Records in the document archive.

**Corrective Action:** The institution will develop policies that require: (i) coaching staff members to identify to the compliance staff the identities of prospects who intend to enroll in the fall but are living in the area during the summer and those who may be visiting frequently to participate in summer workouts; (ii) compliance staff members to issue reminders to coaching staff and to speak in person with as many prospects as possible soon after their arrival in the area to remind them about applicable NCAA legislation; and (iii) the compliance staff to undertake sufficient monitoring to ensure that the information being provided by the prospects is credible. This has been a hot topic for the NCAA Enforcement Staff and has been cited in numerous major infractions cases.

**Date:** Implemented February 4, 2011. See SS Item 15 (g) – Summer Prospect Information Summer and SS Item 15 (g) – Summer Prospects Chart with Instructions in the document archive.

**Corrective Action:** Ensure that information is being gathered regarding individuals who accompany prospects to campus for unofficial and official visits, especially in men’s basketball. This information will include their identity, their method of transportation, lodging, if appropriate, and how the transportation and lodging was paid.

**Date:** The institution already collects this information via the official visit form. Refer to the Grizzly Athletics Compliance Policies and Procedures manual (pdf pages 52 - 55).

**h. Camps and clinics.**

**Corrective Actions:** Develop an employment statement to be signed by individuals working at institutional basketball camps and clinics to indicate that they are not associated with a basketball prospect that is being recruited by the institution.

**Date:** Policies and forms completed December 22, 2010. The institution will implement with the 2011 summer camps. See SS Item 15 (h) – Men’s Basketball Camp form in the document archive.

**Corrective Action:** Review camp policies and procedures to ensure that all institutional basketball camps are operated in a similar manner. Also conduct post-camp audits or reviews to determine whether differences exist in camp operations and whether those differences conform to the intent of the NCAA’s Basketball Focus Group (BFG) initiatives.

**Date:** The University has existing policy that applies to all sports camps. See Grizzly Athletics Departmental Policies & Procedures manual, starting on pdf page 61. The University will implement with the 2011 summer camps.

**Corrective Action:** Utilize the services of the institution’s internal audit staff to conduct an audit of sports camps. The internal audit staff has devoted significant time and resources to conduct audits of the athletics department. Many of these audits have been conducted on the recruiting activities of various sports and have been beneficial for compliance purposes. However, sports camps have not been audited. This does not need to be an audit of every camp, but should at least include the institution’s high-profile sports and any other camps that attract a large number of participants.
Date: The institution will implement this action in UM’s four-year internal audit cycle. The UM Internal Audit staff will audit all the camps, with the higher profile camps getting reviewed more often. See SS Item 15 (h) Audit of sports camps in the document archive for confirmation from UM Internal Auditor.

i. Investigations and self-reporting of rules violations.

Corrective Action: Ensure that the Policies and Procedures for Processing NCAA Rules Violations contain the current procedures and is reviewed and approved by the new president. With the impending retirement of the current president, this would be an opportune time to have these policies and procedures reviewed for possible revisions. It is important for the new president to be familiar with and understand the policies and procedures, especially since it is stated that he will appoint members to the investigative committee.

Date: Completed January 11, 2011. The Policies and Procedures for Processing NCAA Rules Violations section of the IA compliance manual was reviewed and approved by President Engstrom on January 11, 2011. See SS Item 15(i) – Infractions Investigation Policy in the document archive.

Corrective Action: If the Compliance Assistant has identified a possible rules violation and forwarded it to the SAAD, the SAAD needs to share the outcome of possible rules violation with the Compliance Assistant once a final determination has been made. Sharing this information with the Compliance Assistant will be helpful to her training in her position and better prepare her for reviewing compliance documentation in the future.

Date: The institution has implemented this corrective action. See SS Item 15 (i) and (j) - Sharing Rules Interpretation in the document archive.

j. Rules education.

Corrective Action: Develop an orientation program for newly-hired coaches (and other athletics department staff members) in all sports regarding NCAA legislation and compliance policies and procedures. Although some sports programs conduct an orientation with new staff members, it is important to ensure that all newly-hired coaches are educated by the compliance staff on NCAA legislation and compliance policies and procedures.

Ensure that non-coaching staff members (director of operations, graduate assistants) receive appropriate orientation training upon their hiring or when they are transferred to that position. At a minimum, orientation training for coaching and non-coaching staff members should include the forwarding of a list of dos/don’ts. The staff member should acknowledge receipt of written information.


Corrective Action: Require the compliance staff to conduct team meetings at the end of the academic year to provide rules education reminders that are relevant to summer issues for student-athletes. As an alternative, have the compliance staff prepare an outline of important topics and require coaches to provide this information to their team members before they depart campus for the summer.


Corrective Action: Ensure that booster education materials are provided to businesses that have been recruited by Learfield Sports as sponsors of the athletics department.
Date: Implemented Fall Semester, 2010. The General Manager of Learfield Sports has agreed to begin including a letter with do’s and don’ts to business when signing new contracts or during the contract renewal process. See SS Item 15 (j) – Chamber letter email and SS Item 15 (j) – Chamber rules education in the document archive.

Corrective Action: Consider providing a letter with rules education reminders to local merchants in the Missoula area at the start of the academic year to remind them of extra benefit legislation and employment rules regarding student-athletes. One means would be to partner with the local chamber of commerce to include these educational reminders in one of their monthly mailings toward the start of the academic year to reduce mailing costs and reach all chamber members. See SS Item 15 (j) – Chamber letter email and SS Item 15 (j) – Chamber rules education in the document archive.

Date: Implemented Fall Semester, 2010.

Corrective Action: Ensure that during the monthly head coaches meetings, emphasis is placed on their role to promote an atmosphere of compliance within their programs and that they are responsible for the actions of their assistant coaches and other staff members within their sports program. Since the assistant coaches do not attend this meeting, it is important that the head coaches provide any rules education reminders and updates to their coaching staffs and to monitor the activities of their staff members. It is important for the University to demonstrate that assistant coaches are receiving educational materials.

Date: Implemented February 1, 2011.

Corrective Action: Ensure that the compliance assistant is copied on all responses to interpretive questions. This will not only assist the compliance assistant in growing in her position but also improve the efficiency of the compliance office. Depending upon the specific subject, all coaches or other staff members should receive a copy of the interpretations.

Date: This institution implemented this corrective action immediately after responses on September 27, 2010. See SS Item 15 (i) and (j) - Sharing Rules Interpretation in the document archive.

Extra benefits.

Corrective Action: Develop a plan to increase the participation of student-athletes in exit interviews/surveys. Consider withholding award letters, participation in team post-season banquets, or transfer documentation until student-athletes participate in the exit survey. These exit surveys are important because they provide information about the experience of student-athletes during their time at the institution.

Date: During the course of NCAA certification, the SAAD worked with the subcommittee for student-athlete welfare to develop a new exit interview survey and the process to administer the survey. The first survey under the revised format and process was conducted in December 2010. See “Exit Survey and Exit Survey Results 2009-2010” in the Student-Athlete Welfare section of the document archive. Also see, SS Item 15 (k) – Mandatory Exit Meetings in the document archive.

1. Playing and practice seasons.

Corrective Action: Revise the Countable Athletically-Related Activities (CARA) forms to include the signature or initials of two or three team members to indicate their agreement with the information provided by the coaching staff regarding the duration of competition and practice activities.

Date: During the Spring Semester of 2011, the institution will pilot a new CARA submission process with the sports of men’s tennis, women’s tennis, women’s golf and women’s basketball. Each Monday,
the Compliance Assistant will send an email to the SAAC representative for each of those sports, asking for verification of the previous week CARA. If that process works smoothly, full implementation with all sports will begin Fall 2011.

**Corrective Action:** Increasing the frequency of CARA form submissions to a weekly or bi-weekly basis. Monthly completion of the CARA form increases the likelihood of inaccurate information being submitted due to the time that has passed since the activities have occurred. Further, if the process is changed to include acknowledgment of student-athletes to confirm the accuracy of the CARA information, the more timely completion of the CARA forms also increase the likelihood that the student-athletes signing or initialing their acknowledgment will have a more accurate memory of the information provided by the coaching staff.

**Date:** During the Spring Semester of 2011, the institution will pilot a new CARA submission process with the sports of men’s tennis, women’s tennis, women’s golf and women’s basketball. Each Monday, the Compliance Assistant will send an email to the SAAC representative for each of those sports asking for verification of the previous week CARA. If that process works smoothly, full implementation with all sports will begin Fall 2011.

**Corrective Action:** Develop a means to test the veracity of countable activity information submitted by coaches and document this procedure. The compliance staff will compare the class schedules of selected student-athletes against the times they have indicated as being in practice to ensure that participation in practice activities are not occurring when they are supposed to be in a class or lab.

**Date:** Initiated Spring Semester 2011.

m. **Student-athlete employment.**

**Corrective Action:** Include a section in the student-athlete handbook to describe the process that student-athletes are to follow and the form they are to use to inform the athletics department of their employment arrangements.

**Date:** The institution will implement this beginning with the 2010-11 Grizzly Athletics Student-Athlete Handbook (see page 72).

n. **Amateurism.**

**Corrective Action:** Revise the conference historical questionnaire utilized by the institution to include questions about possible participation with student-athletes who are considered professional or on a team that considers itself to be professional. With the passage of NCAA proposal 2009-22, participating with professionals or on a team that considers itself to be professional no longer affects the eligibility of a prospect.

**Date:** For continuing student-athletes, questions will be added to our historical questionnaire addressing these issues starting August 1, 2010. See SS Item 15 (n) Historical Questionnaire in the document archive.

o. **Commitment of personnel to rules-compliance activities.**

**Corrective action:** Revise the hiring process for athletics department coaching staff members to include a background check with the NCAA Enforcement Staff to determine whether any coaches were previously named in a major violation of NCAA legislation.
**Date:** NEED PLAN FOR IMPROVEMENT. The background check should be done before interviews take place.

**Suggested Plan for Improvement:** Continuing-eligibility Certification

**Plan for Improvement**
**Operating Principle 1.2 – Item 15(c)**

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<th>ELEMENT</th>
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<tbody>
<tr>
<td>Issue</td>
<td>Measurable Goal(s)</td>
<td>Steps to Achieve Goal</td>
<td>Jean Gee, Senior Associate Athletic Director</td>
<td>Implement no later than August 1, 2011.</td>
</tr>
<tr>
<td>A “registration hold” process restricting a student-athlete from dropping below full-time status needs to be implemented. The Registrar’s Office will program the BANNER Student Information System to accomplish this goal.</td>
<td>Develop and implement an effective “registration hold” process that restricts a student-athlete from dropping below twelve credits unless authorized by a representative of the Intercollegiate Athletics Academic Services program.</td>
<td>(1) Using available BANNER “minimum credits registered” functionality, enable, test and activate this tool in the registration module. (2) Notify and request comments from the University Athletic Committee, enrollment services, financial aid, business services and other relevant campus entities. (3) Notify all student-athletes, coaches, etc. about the new procedure/process.</td>
<td>Jean Gee, Senior Associate Athletic Director</td>
<td>Implement no later than August 1, 2011.</td>
</tr>
<tr>
<td>The Office of Human Resources does not have a process in place to conduct background checks, with NCAA Enforcement Staff, for coaching applicants to determine if applicant has any prior rules violation.</td>
<td>Develop an effective process/system to conduct background checks, with NCAA Enforcement Staff and prior to any interviews, on coaching applicants to determine if applicant has any prior rules violation.</td>
<td>Work with Office of Human Resources to get background check added to hiring checklist for coaching applicants.</td>
<td>Jean Gee, Senior Associate Athletic Director</td>
<td>Implement no later than August 1, 2011.</td>
</tr>
</tbody>
</table>
**Item 16.**

Submit a copy of the report from the institution’s most recent rules compliance evaluation. [Please use the file upload link contained within this question on the ACS to submit a copy of the institution’s most recent rules compliance evaluation.]

**Response:**

Copy of the most recent rules compliance evaluation: *Review of Certain Components of the Athletics Department’s Compliance Program and Athletic Academic Services Program for Student-Athletes (October 25, 2010)* will be uploaded.

**Item 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.

**NOTE:** The subcommittee has developed five plans for improvement. These plans will be developed and approved during March – April 2011 as identified in the Steering Committee’s schedule. Additional plans may be required if Athletics is unable to respond prior to this Self-Study being submitted to NCAA.