recruiting forms are online for coaches to retrieve. Currently, coaches are not able to complete and submit forms online, as recruiting records are hard copy files kept by the DOC.

Coaches input prospective student-athlete (PSA) information into CA as soon as they know they are interested in that PSA. Coaches then use CA to track contacts and evaluations. The DOC monitors the coaches' recruiting activities by checking the CA logs every two weeks.

3. Principle Concerns – Expenditures for recruiting are handled through a coach's personal funds at the time of the transaction and then reimbursed through a process monitored by the athletics department's Business Manager. Current practices require coaches to submit an itinerary for all visits. This financial system is a common practice at Division II institutions. Unfortunately, this practice is unlikely to identify inadvertent compliance violations since there is no compliance check in the system to identify expenses contrary to NCAA legislation.

4. Recommendations – TCG recommends the following:

   i. Require the Compliance Office to approve all recruiting travel reimbursements. The approval from the Compliance Office will help to safeguard against any long-term, systematic errors in recruiting. The Compliance Office also will gain a more detailed understanding of the recruiting activities occurring and can identify areas needing additional rules education. The current process has only the Business Manager identifying compliance issues with travel reimbursements. (Also, the role of the Business Manager should be added to the travel reimbursement process).

D. Financial Aid Administration

1. General Observations – Coaches annually initiate the athletics aid process through forms provided to the DOC. The DOC prepares the materials and presents the information to the Director of Athletics, who checks for compliance with both the

budget and squad list numbers. If a coach plans to reduce or cancel aid, he or she must first get approval from the Director of Athletics. Additionally, coaches are required to meet individually with student-athletes whenever aid is to be cancelled or reduced.

2. Key Strengths – The Director of Athletics takes an active role in managing the financial aid area. Each coach meets with him weekly, and scholarship plans are a part of the regular agenda. The Director of Athletics approves all offered and awarded athletics aid. The Director of Athletics has detailed historical records that corroborate the information on the squad lists. These records provide a better understanding of the patterns and distribution of athletics aid and assist with reporting requirements.

3. Principle Concerns – The DOC currently inputs all financial aid information into CA. The DOC uses data from Office of Financial Aid reports and internal aid records to create the squad lists. Similar to the eligibility area, there is significant risk of human error when manual data entry is required for such a large number of data points.

   In the process of certifying NCAA squad lists, the coach, Director of Athletics, and Director of Financial Aid all review and sign the squad lists indicating they have reviewed the information. The Director of Financial Aid reviews individual student-athlete award amounts for federal limits; however, she does not review NCAA individual or team limits. CA is tasked with checking that both individual and team limits are within NCAA requirements. Most importantly, in the current system, the athletics department is determining whether non-athletics aid is countable toward NCAA limits, and there is no one outside of that athletics department that is reviewing these determinations.

4. Recommendations – TCG recommends the following:

   i. Explore whether information from the Bossanova system can be downloaded into CA. The Director of Financial Aid indicated that the current reporting system operated by her office may be able to be mirrored to allow the athletics department to run reports as needed. Reports are configured in Excel format and possibly, with appropriate manipulation, could be uploaded to CA. Loading these reports directly to CA will significantly reduce the likelihood of inadvertent errors to the squad lists.

ii. Include the Office of Financial Aid in reviewing whether non-athletics aid awarded to student-athletes has been appropriately determined to be countable or non-countable. Currently, the athletics department is determining whether non-athletics aid is countable toward NCAA team and individual limits and inserts that information into CA. With additional NCAA legislation training, the Director of Financial Aid could conduct this review and consult with the athletics department to ensure there is agreement between the two parties as to what constitutes countable aid for NCAA purposes. This change would add an extra level of monitoring to the area of financial aid where the determination of countable and non-countable non-athletics aid is a factor.

iii. Ensure that the annual rules education component for the Financial Aid Office, as mentioned in the compliance manual, is occurring. As mentioned in the rules education section of the compliance manual, the institution should provide at least an annual rules education for the institution's staff members outside of the athletics department with NCAA compliance responsibilities.

E. Student-Athlete Issues

1. General Observations – The institution has systems in place to support the well-being of its student-athletes. The sports medicine program has established policies and procedures and works regularly to improve services. For example, the head athletic trainer, coach, and four student-athletes recently attended the APPLE conference to learn more about substance abuse.

Student-athletes have access to academic services through the institution, which is then supplemented by assistance from the DOC and their coaches.