SECTION 13: COMPLIANCE MANUAL

I. INDIVIDUAL COMPLIANCE RESPONSIBILITIES

As an NCAA member institution, the College of William and Mary shall comply with all applicable rules and regulations of the NCAA in the conduct of its intercollegiate athletics program. Members of the athletic department staff, student-athletes, College officials associated with W&M Athletics, and representatives of William & Mary’s athletic interests all share in the responsibility of awareness of the governing legislation and adherence to it. Ultimately, accountability lies with the coaches and administrators, who by contract can be terminated for intentional or repeated failure to comply with institutional, conference and NCAA rules and regulations. All individuals employed by the College of William & Mary Athletics Department are responsible for educating themselves on the rules and asking for interpretations of rules prior to acting or allowing another coach, student-athlete, booster, or administrator to act in ways that may violate the legislation.

A. Athletics Director. The Athletics Director is ultimately responsible for rules compliance and enforcement. This individual shall ensure the College of William and Mary is in compliance with NCAA, Colonial Athletic Association, and institutional rules and regulations.

B. Associate Athletics Director, Internal Operations. This person oversees the Compliance Office staff and Academic Support Services staff and is responsible for the department’s policies and procedures, including development, implementation and review of institutional rules and regulations that may be more rigorous than those of the conference or NCAA. This individual also oversees the playing and practice season schedules, as well as monitors the minimum and maximum number of competitions for teams and individuals.

C. Senior Associate Athletics Director, Development. This individual acts as a liaison between the compliance office and representatives of athletics interests including, but not limited to, donors and booster club members with regards to rules interpretations and promoting education of NCAA regulations to individuals associated with specific athletic teams and the department as a whole.

D. Assistant Athletics Director, Business Affairs. This individual is responsible for monitoring travel expenses, recruiting expenses, camp employment of current student-athletes, and other reimbursements to coaches and individuals to ensure compliance with recruiting and extra benefits legislation. This person shall be required to bring discrepancies and peculiarities in expense reports to the attention of the Compliance Office for further investigation.

E. Assistant Athletics Director, Facilities and Operations. This person oversees the overall coordination with outside entities on the use of institutional facilities for non-institutional camps, local sports clubs, and other non-institutional athletic events. This individual shall ensure that institutional and non-institutional camps
abide by NCAA regulations and that institutional camps are pre-approved by the Compliance office in their format and timing.

F. Assistant Athletics Director, Health Services. This individual is responsible for the oversight of the sports medicine department’s administration of NCAA and institutional drug testing and the evaluation of the weekly practice reports for each team. Additionally, this individual is responsible for preparing and filing medical hardship waivers with the conference office. The entire sports medicine department shall ensure that the provision of medical and rehabilitation services and expenses for student-athletes complies with NCAA rules and regulations and that student-athletes are educated on permissible nutritional supplements and banned substances. Athletic trainers are responsible for evaluating supplements and medications used by student-athletes to ensure their legality for consumption.

G. Senior Assistant Athletics Director, Public Relations. This person is responsible for the overall publicity of the athletic teams and the production of media guides for individual sport teams with regards to the NCAA regulations, as well as ensuring proper release of information relative to prospects signing National Letters of Intent with the College of William and Mary. This individual shall serve as the liaison between the compliance office and the media with requests for interpretations and education of NCAA regulations.

H. Assistant Athletic Director, Compliance and Academic Support Services. This person, along with the other employees of the compliance office, is responsible for the daily operation of the compliance program including rules education, application of eligibility and financial aid regulations, rules interpretations, NCAA legislative cycle, administration of the Special Assistance Fund, administration of the Coaches Certification Exam, review of major compliance components, and reporting infractions. This office serves as athletics department liaison internally with Admissions, Financial Aid, and the University Registrar, and externally with the conference compliance office and the NCAA Eligibility Center. Additionally, this person is responsible for annual reporting of Federal Graduation Rates, NCAA Graduation Success Rates, and NCAA Academic Performance Rates.

I. Director of Academic Support for Athletics. This individual is responsible for the education of student-athletes regarding continuing eligibility, both institutionally and athletically and assists in the pre-advising process. Additionally, this person shall ensure the availability of tutors and academic support for those student-athletes who require or desire extra assistance with academic assignments.

J. Director of Marketing, Promotions & Ticket Operations. This person is responsible for the education and day-to-day implementation of the regulations and monitoring procedures applicable to marketing and promotion of sport teams, including the assurance of the proper use of current and former student-athlete
names and images in sponsor advertisements. They are also responsible for the
distribution of complimentary tickets, group ticket policies and ticket sales and re-
sales for fundraisers.

K. **Director of Corporate Sales and Sponsorships.** This person is responsible for
acquiring business partners to underwrite the costs of athletics through brand
exposure and promotional activities at sports events, and to craft a positive
response to public inquiry and interest.

L. **Head Coaches.** These individuals are responsible for ensuring education of and
adherence to NCAA rules and regulations by themselves, their staff and their
players. They verify eligibility of players and confirm squad list accuracy for
their team. Coaches also fully participate and cooperate in compliance procedures
and evaluations, including cooperation with the NCAA, conference or institution
with truthful and complete information concerning involvement in or knowledge
of rules violations. A coach may be suspended or terminated if found to be
involved in deliberate and serious violations of NCAA regulations.

M. **Strength and Conditioning Coaches.** These individuals are responsible for
ensuring education of and compliance with rules relative to extra benefits, playing
and practice season restrictions and recruiting regulations.

N. **Equipment Manager.** This person is responsible for ensuring education of and
compliance with NCAA restrictions on equipment distribution, extra benefits,
retention of athletics apparel and equipment and recruiting regulations.

O. **Athletic Policy Advisory Committee.** These individuals are responsible for the
promotion of compliance with University, Conference and NCAA rules education
and regulations. The committee is also responsible for assisting with NCAA self-
study as determined by the President.

P. **Faculty Athletic Representative.** This faculty member serves as liaison between
athletic administration and faculty members, as well as a contact for student-
athletes outside of athletic administration. This individual shall verify initial and
continuing eligibility of all student-athletes prior to outside competition each
semester. Additionally, this person is available to authorize waivers to the
NCAA, as well as award nomination submissions.

Q. **Admissions.** Assistant Dean shall serve as liaison to Athletics and verify
admissibility and qualifications of prospective student-athletes to the College of
William & Mary. This individual is responsible for scheduling Athletics
Admissions Committee to hear cases of select prospects and for confirming
admission requests.

R. **Financial Aid.** The Director of Financial Aid is responsible for officially
awarding athletically related financial aid for initial awards and renewal
notifications. This liaison confirms the accuracy of the squad lists for 23 teams at
the beginning and conclusion of each academic year. Additionally, this person
verifies non-counter certification forms for student-athletes receiving institutional
aid not based on athletic ability. This individual or his/her designee provides
reports on aid accepted by active student-athletes on a regular basis for the
academic year. (August 15, September 15, November 15, January 15, March 15
and May 15).

S. Registrar. The University Registrar and his/her designees are responsible for
verifying initial and continuing eligibility of all student-athletes prior to outside
competition each semester. This office also determines transferable hours for all
transfer students and certifies CAA Transfer forms for transfer student-athletes in
their first semester at William & Mary.

T. Committee for Transfer & Financial Aid Hearing Opportunities. The
Associate Provost for Enrollment shall serve as permanent chair for this
institutional entity composed of five non-athletics department staff members who
shall be charged with hearing appeals by student-athletes who have been denied a
permission to speak to another institution’s athletics department, student-athletes
who have been denied an exception to the one-year residency requirement, or
student-athletes whose financial aid based on athletics ability has been cancelled
and/or not renewed for the current or upcoming academic year.

U. President’s Office. This department is responsible for clearly communicating the
importance of compliance with NCAA, CAA and institutional rules and
regulations for the entire institution, not just the department of athletics. In
addition, the President has compliance responsibilities with regard to athletic
certification and the endorsement of waivers when necessary.

II. RULES EDUCATION PROGRAM

A. Head Coaches & Full-Time Assistant Coaches
   a. Monthly athletic department meetings are held for the purpose of
      reviewing current department business and providing compliance rules
      education. Additionally reviews of new NCAA legislation and review of
      recruiting legislation in preparation for the Coaches’ Certification exam
      shall be held annually.
   b. In the two week interim, a “Tribe Links” e-mail is sent to coaches for
      procedural requirements as well as additional rules education
   c. Requesting interpretations on rules application

B. Other Coaches
   a. Rules Orientation to review important compliance components for which
      new coaches are responsible and an introduction to forms and compliance
      procedures for our institution.

C. Staff Members
a. Meet annually with sub-departments to discuss application of specific rules relative to their responsibilities.

D. Student-Athletes
a. Pre-season team meeting to review relevant rules on eligibility, financial aid, awards and benefits, and playing and practice seasons.
b. End of the year team meeting to discuss amateurism, summer leagues and outside competition
c. Gambling education distributed by coaches surrounding NCAA Men’s Basketball tournament
d. Other education through listserv and in person as necessary around rules violations and new interpretations.

E. Boosters
a. Meet with booster club presidents/chairmen to educate leaders of organizations on recruiting and extra benefits legislation
b. Presentation to football booster group on an annual basis to present rules education and specific application through examples.
c. Create compliance website that includes rules for boosters section
d. Enclose rules education brochure with tax deductible receipts to athletic donors.

F. Prospective Student-Athletes
a. Create compliance website that includes links for prospective student-athletes to NCAA Eligibility Center and section on rules for PSA’s to know

G. Other Constituents
a. Provide NCAA rules education on an as needed basis.

III. INTERPRETATION PROCESS
A. Within the Athletics Department
a. Review the NCAA Manual. Each sport staff and administrative staff is provided at least one NCAA Manual. If the manual does not clearly answer your question, please present the question/scenario to the Compliance Office.
b. E-mail questions inclusive of all facts related to your scenario to a compliance office staff member (phmaso@wm.edu) or (celeatherwood@wm.edu).
c. Research and conclusion by Compliance Office and when necessary, the CAA Senior Associate Commissioner for Compliance, for NCAA rules application and internal institutional policy.
d. Compliance Office will research LSDBi for Bylaw intent and rationale, Official Interpretations, Staff Interpretations, Educational Columns, and Secondary Violations.
e. Compliance Office will e-mail issue, supporting research and conclusion to the person asking the question, as well as any other constituent with a relevant interest.

B. Outside the Athletics Department
a. Questions should filter through Athletics Department Staff member (i.e. parents to coaches, donors to Associate AD for Development, sponsors to Director of Marketing) to ensure education by all parties affected.
b. Athletics Department staff member shall follow procedures above.

C. Boosters and Other Constituents
a. Boosters and other constituents shall direct any questions concerning possible rules interpretations to the Compliance office, either directly or through the Senior Associate Athletics Director, Development.
b. The Compliance Office shall send a written response to the individual who asked the question and copy the Senior Associate Athletics Director, Development regardless if the booster contacted the Compliance Office directly or indirectly.

MAJOR COMPONENTS OF COMPLIANCE
A. Recruiting
a. Recruiting Philosophy
   i. Please refer to Section 9: Student Athlete for the policy and procedures relative to recruiting philosophy at the College of William and Mary.
b. Academic Admissions Processes
   i. PSA Evaluation
      1. Exchanged with admissions liaison on Tuesdays and Thursdays.
      2. Coach submits completed PSA Evaluation cover sheet for most recent recruiting year, high school transcript(s) through 11th grade marks, test scores, and 12th grade course schedule.
      3. Admissions liaison provides evaluation of Approved, Committee-Strong, Committee-Conditional, or No Support.
   ii. Committee Presentations
      1. Athletic Admission Committee hearings are scheduled on an as requested basis. Timing usually requires 7-10 business days to schedule.
      2. Head Coach should be the lead representative at Athletic Admissions Committee presentations. Assistant recruiting coach may be present at committee to provide personal details and interaction with the recruit of which the head coach may not have first-hand knowledge.
      3. Presenters shall meet with the compliance office liaison at least 48 hours prior to the scheduled hearing to review the case, ensure proper supporting materials (counselor recommendation, newspaper clippings, writing sample or personal statement, coaches summary, past committee case success, graduation data, etc) are available and to prepare for the presentation.
      4. Committee decisions are final.
iii. Application Deadlines
   1. Early Decision—November 1
   2. Regular Decision—January 1
   3. Transfer—March 1

iv. Referrals
   1. Prospects who are waitlisted or denied and approved for a referral or approved prospects who apply after the application deadline may have a referral submitted for admission to the class.
   2. Except in pre-approved and special circumstance cases, once a referral is issued for a prospect, if the prospect chooses not to attend the College of William and Mary, the referral is NOT reusable.
   3. All approvals must be submitted by the head coach.
   4. Requests for additional referrals must be made to the compliance office and cannot be bartered among sport programs directly.

c. Recruiting Records
   i. Each prospect whom the coaching staff earnestly recruits shall include a file or database of the following:
      1. Contacts with a prospect or prospect’s parents off-campus
      2. Evaluations during the academic year
      3. Telephone calls to a prospect or the prospect’s parents
      4. General correspondence and attachments
      5. Official visit approval forms and itineraries
      6. Unofficial visits
      7. Questionnaire
      8. Written Correspondence
      9. Dates and types of recruiting materials sent to prospect
   ii. Recruiting files must be submitted to the Compliance Office no later than June 1 for the incoming recruiting class; however, if a sport completes its recruiting class prior to June 1, recruiting records may be submitted earlier than that date.

d. Official Visits
   i. Pre-approval for all official visits must be made by the Compliance Office prior to a prospect’s departure for the visit.
      1. Compliance office shall inform the business office of pre-approval of all official visits via scanned approval forms in a shared drive.
      2. All prospects offered an Official Visit must be registered with the NCAA Eligibility Center and added to our institutional request list (IRL) on the NCAA Eligibility Center database.
   ii. PSAE—Prospective Student-Athlete Evaluation must be performed by Admissions Liaison and determined that a PSA is admissible prior to approval for an official visit.
1. In the case where a PSA is not officially admissible, but receives a rating of “committee-strong” or “committee-conditional”, coaching staff must present to the Compliance office persuasive evidence of the athletic value of the PSA and mitigating factors affecting the academic qualifications.

iii. Complete an Official Visit Approval Form at least 72 hours prior to the official visit. If a PSA Evaluation has NOT been performed, you must provide unofficial high school transcript, senior class schedule and SAT and/or ACT score reported by the testing agency or on the high school transcript. Hand written test scores shall not be permitted.

iv. Student Host Guidelines are printed in the Student-Athlete handbook and copies are provided and certified by each student-athlete at the fall team meeting. Please ask student-athletes serving as hosts to review the guidelines one day prior to hosting a prospective student-athlete.

v. Post-visit accounting shall be submitted to the business office for reimbursement purposes and a copy shall be kept in the PSA file for end of the year compliance review of recruiting records.

e. Four Year Transfers

i. A written release must be obtained from the Director of Athletics at the four year institution prior to any contact with the prospective transfer student-athlete. Please forward requests to the Compliance office in writing and official request shall be made through the Compliance office. NCAA member institutions are required by regulations to reply to any request for permission to speak within 7 business days.

ii. Upon admissions acceptance and deposit paid by a transfer student-athlete, the Compliance Office shall request a transfer tracer from the original four year institution which includes academic information required for eligibility certification.

f. Permissible Recruiters

i. Designated by the Head Coach as a countable coach and off campus recruiter for the program.

ii. Pass (80% or better) the Coaches Certification online exam by July 31 each year.

B. Eligibility

a. NCAA Eligibility Center

i. The Eligibility Center certifies the initial academic eligibility and amateurism status for all student-athletes.

ii. All incoming freshmen must be certified as a Qualifier by the Eligibility Center in order be eligible to compete at a CAA institution.

iii. All incoming freshmen and new student-athletes must be certified as an amateur prior to their first intercollegiate competition.
iv. A prospective student-athlete must register with the NCAA Eligibility Center prior to receiving an official visit.

v. A high school or two year college transfer prospective student-athlete must register with NCAA Eligibility Center AND complete the initial amateurism questionnaire prior to being offered a National Letter of Intent and Financial Aid Agreement.

b. Continuing Eligibility
   i. All student-athletes must be certified as eligible to compete prior to each regular academic term (fall and spring semester).
   ii. The Compliance Office shall prepare the Eligibility Certification cover sheet through the Discoverer Report in ODSP. This cover sheet includes manually entered initial eligibility for incoming freshmen and transfer eligibility for two year and four year transfers.
   iii. Unofficial transcripts of each student-athlete on the Eligibility Certification cover sheet are included in the Eligibility Certification packet.
   iv. NCAA Eligibility Center summary page of all prospects by sport is included in the Eligibility Certification packet.
   v. NCAA Compliance Forms summary page of all student-athletes on the roster is included in the Eligibility Certification packet.
   vi. If applicable, transfer tracer forms are included in the Eligibility Certification packet.
   vii. Full Time Status—the Compliance Office and Academic Support Office monitor full time status of all student-athletes. An email from the University Registrar is generated on a daily basis with all active and inactive student-athletes in the Banner SGASPRT for the current term who are registered for less than 12 hours. Approved underloads for student-athletes in their final semester are indicated on the email.

c. Hardship Waivers
   i. The Head Coach shall request hardship waivers through the Assistant AD Health Services.

C. Financial Aid
   a. Individual Limits
      i. Employment
      ii. Government Grants
      iii. Other Scholarships or Grants
      iv. Loans
      v. Other
   b. Team Limits
   c. Renewals and Nonrenewals
   d. Reductions and Cancellations
   e. Book Scholarship Procedures
   f. Squad Lists
i. Fifth Year of Athletics Aid
ii. Summer Athletics Aid

D. Amateurism
   a. Initial Eligibility Center
   b. Outside Competition during the Academic Year
   c. Outside Competition outside the Playing and Practice Season
      i. Summer Baseball Leagues
      ii. Summer Basketball Leagues
   d. International Student-Athlete Questionnaire

E. Playing Seasons
   a. Declaration of Playing and Practice Season
      i. Length of Season
      ii. Critical Dates
      iii. Number of Contests
   b. Exemption of Events
   c. Weekly Practice Reports
      i. Completed and submitted to the Assistant Athletics Director, Health Services weekly during the academic year.
      ii. Individual activity must be recorded on a different report than the team report.
      iii. Student-Athletes must sign the Team Practice report weekly.

F. Promotions & Publicity

G. Sports Camps
   a. Camps and clinics are organized to provide opportunities to learn skills and strategies and to provide competitive experiences to individuals with unusual or above average interest, potential and or/ ability.
   b. Coaches hosting an institutional sport camp or employed by a non-institutional camp must review the NCAA Guidelines for Camps and Clinics under Section 14, Appendix C.
      http://tribeathletics.test.wm.edu/policies/14-c.pdf
   c. PRIOR to the camp, a coach hosting an institutional camp OR a coach owning or operating his/her own camp off campus must submit the following for approval:
      i. Camp/Clinic Description Form (Section 14, Appendix D)
      ii. Employment Contract (Section 14, Appendix E) for EVERY employee of the camp (paid or volunteer)
   d. At the CONCLUSION of the camp, a W&H coach hosting an institutional camp or a W&M coach owning or operating his/her own camp must complete the following and submit to the Compliance Office for monitoring:
      i. Staff Summary Form for all paid and volunteer employees of the camp (Section 14, Appendix F)
      ii. Camper Roster Form—Ledger shall be used to document the payment of fee by all camp attendees. Camp directors should keep copies of all checks received as well as receipts for cash received for deposits and payments. (Section 14, Appendix G).
iii. Individual Discounts/Group Discounts—Must be explained on the Camp/Clinic Description form and accounted for on the Camper roster Form.
iv. Camper Refund Form—All refunds of deposits and/or camp payments must be documented and explained as necessary on this form.

H. Local Sports Clubs
a. Coaches and institutional staff member in sports other than basketball may be involved in any capacity (e.g. as a participant, administrator or in instructional or coaching activities) in the same sport for a local sports club or organization located in the institution’s home community, provided all prospective student-athletes participating in said activities are legal residents of the area (within a 50-mile radius of the institution).

b. Coaches or institutional staff members employed by a local sports club must submit the following to the Compliance Office for approval on an annual basis or more often with employment or participant changes:
   i. Name and address of local sports club employer
   ii. Detailed description for the coach of his/her title, duties, responsibilities and any personal interaction with players/athletes of the local sports club
   iii. Detailed club team roster with home street, city and zip code address for all participants on the local club team with which an institutional staff member may have coaching responsibilities.

c. Coaches or institutional staff members who organize or direct a local club team must submit the following to the Compliance office for approval on an annual basis or more often with applicable changes;
   i. Club Description Form (similar to Camp Description Form)
   ii. Web page URL, advertising media and methods of advertising
   iii. Detailed description for the coach of his/her title, duties, responsibilities and any personal interaction with players/athletes of the local sports club
   iv. Detailed club team roster with home street, city and zip code address for all participants on the local club team with which an institutional staff member may have coaching responsibilities

I. Complimentary Admissions

IV. INFRACTIONS
A. Self-Reported Secondary Violations
   a. It is required by contract that all institutional department staff members are required to report to the Compliance Office any potential violation that is brought to his/her attention involving him/herself, a colleague, a student-athlete or a representative of athletics interest.

   b. Verbal reports should be provided to the Compliance Office for further determination and research.

   c. Once a violation has been determined to have occurred, the Compliance Office is responsible for filing a Level I or Level II self-report to the
NCAA and/or the CAA including facts, reasons for the violation, mitigating circumstances, case precedence for penalties imposed, request for reinstatement of eligibility if required, and corrective action taken by the institution to ensure future compliance.

d. Athletics department staff member involved in a violation shall provide a written detail of events and occurrences upon request.

e. At all times, athletics department staff members are required to cooperate and are expected be forthcoming during an internal or external investigation.

f. Compliance office shall issue letters of reprimand and provide required education when imposed.

B. Major Violation Investigations

a. Major rules infractions discovered by the institution or potential major rules infractions being investigated by the NCAA on the institution’s campus shall be coordinated by the Assistant AD for Compliance in conjunction with the Office of Legal Affairs. The Office of Legal Affairs shall provide guidance and counsel to the department on how to proceed, if outside legal counsel to represent the institution’s interests should be secured, and how an internal investigation should be conducted.

b. At all times, athletics department staff members are required to cooperate and are expected to be forthcoming during an internal or external investigation.

c. Individual athletics department staff members involved in a potential major violation may secure personal legal counsel at any time at his/her own expense, but the institution shall not be obligated to provide legal counsel for any individual being investigated by the institution, the conference, or the NCAA.

V. INSTITUTIONAL CONTROL

A. Certification of Compliance for Institutions
B. Certification of Compliance for Staff Members
C. Financial Audit
D. Conference Compliance Audit
E. Institutional Self-Study
F. Institutional Certification