



THE UNIVERSITY OF MICHIGAN  
ATHLETIC DEPARTMENT  
COMPLIANCE SERVICES OFFICE  
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**MEMORANDUM**

**TO:** All Athletic Department Staff.  
**FROM:** Judy Van Horn, Associate Athletic Director. *JVH*  
**SUBJECT:** *Effective March 1:* New Escalation Policy for Selected Compliance Monitoring Forms.  
**DATE:** February 18, 2010.

As discussed at the January coaches meeting and February coaches' rules education meetings, the Athletic Department is implementing an escalation policy for selected compliance monitoring systems. *Note that this policy goes into effect March 1, 2010.* Basically, there are new hard-and-fast deadlines for submitting compliance forms. The monitoring systems included are:

1. Coaching Designation/Staff Limitations.
2. Countable Athletically Related Activities (CARA).
3. Declaration of Playing and Practice Season.
4. Football Summer Conditioning & Declaration of Weeks.
5. In-Person Recruiting Contacts and Evaluations.
6. Non-Coaching, Sport-Specific Staff Job Descriptions.
7. Non-Coaching, Sport-Specific Staff Agreements.
8. Outside Athletically Related Income.
9. Prospects on Campus Prior to Enrollment.
10. Telephone Recruiting Contacts.
11. Volunteer Coaches Agreements.

The escalation policy for these compliance monitoring systems is as follows:

1. *At the beginning of each month or at the specified time a document is due.* At the beginning of each month or at the specified time a document is due, the Compliance Services Office (CSO) will send the applicable staff member an email reminder that the compliance forms are due in two weeks (the email will include a specific date). The two-week period accommodates special circumstances such as team travel for away competition, postseason competition or illness that may impact a sport's ability to submit the forms in a timely manner. For documents involving student-athletes, consideration will be given due to vacation period breaks that occur early in the month in cases where a particular sport's student-athletes are unavailable. For outside athletically related income forms, only the involved staff member will receive the form.



2. *After two weeks.* Staff/sports that do not submit the requested compliance document on time will receive a "Final Notice" reminder with copies going to the head coach, the document preparer, the sport administrator and the athletic director. For outside athletically related income forms, notice will be provided to the involved staff person, their supervisor and the athletic director.
3. *After one additional week.* The President of the University and the General Counsel will be notified of any staff/sports that have not submitted their compliance forms within one week of receipt of the "Final Notice" reminder.

Attached for your review are copies of the new General Process Policy for Compliance Monitoring Systems as well as the Policy for Monitoring Countable Athletically Related Activities. Please do not hesitate to contact me at 7-3845 with any questions regarding this new escalation policy. Thank you for your commitment to timely submission of athletics compliance forms.

#### Attachments

cc: Percy Bates, Faculty Athletics Representative  
Dave Brandon, Athletic Director [Effective March 8, 2010]  
Sally Churchill, Vice President and Secretary of the University  
Mary Sue Coleman, President  
Debbie Kowich, Assistant General Counsel  
Bill Martin, Athletic Director  
Suellyn Scarnecchia, Vice President and General Counsel  
Carol Senneff, Executive Director of University Audits



# UNIVERSITY OF MICHIGAN DEPARTMENT OF ATHLETICS



## COMPLIANCE SERVICES OFFICE General Process Policy for Compliance Monitoring Systems [Effective March 1, 2010]

**Compliance Monitoring Systems.** This summary of the procedures for monitoring various athletics compliance system outlines the goals of the University of Michigan's athletic compliance program and presents a critical component of a comprehensive athletic compliance program. The purpose is to prevent the occurrence of violations in the Michigan intercollegiate athletics program while creating an administrative system of checks and balances that maintains institutional control and provides a heightened level of monitoring that is responsive to the needs of intercollegiate athletics and the University community.

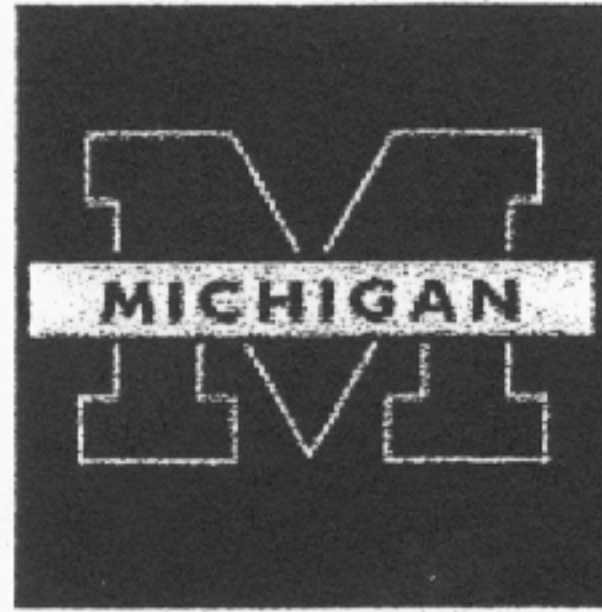
The University is accountable for the actions of individuals to whom it delegates authority for its athletics program and, therefore, has clearly communicated compliance expectations and has established effective monitoring systems for countable athletically related activities to ensure accountability. The University recognizes that NCAA rules compliance must be a collective institutional responsibility and that many departments and administrators must play important roles in its athletics compliance program. On campus, institutional compliance with NCAA regulations has become a shared responsibility through a coordinated process of delegation and distribution of key administrative functions.

The University of Michigan will employ the following procedures to monitor applicable compliance systems for all varsity sports.

- a. **Education.** The Compliance Services Office (CSO) annually reviews NCAA rules impacting applicable compliance monitoring systems with various constituencies within the Athletic Department. This communication will be logged and documented by the CSO.
  - 1) **Coaches.** This occurs in conjunction with ongoing rules education, including in-person meetings, compliance resources and memorandum. Also, head coaches are copied on all educational emails provided to student-athletes.
  - 2) **Student-athletes.** For those monitoring systems that directly involve student-athletes, they shall be provided verbal instructions, written resource materials and email reminder(s) that review applicable NCAA rules. Student-athletes are asked to report any abuses of the rules to the CSO who will insure confidentiality.
  - 3) **Sport administrators.** This occurs in conjunction with the annual in-person rules education meeting and accompanying resources. In addition, sport administrators receive a copy of



# UNIVERSITY OF MICHIGAN DEPARTMENT OF ATHLETICS



## COMPLIANCE & RULES EDUCATION Policy for Monitoring Countable Athletically Related Activities [Revised Effective March 1, 2010]

**Monitoring Countable Athletically Related Activities (CARA).** This summary of the procedures for monitoring countable athletically related activities outlines the goals of the University of Michigan's athletic compliance program and presents a critical component of a comprehensive athletic compliance program. The purpose is to prevent the occurrence of violations in the Michigan intercollegiate athletics program while creating an administrative system of checks and balances that maintains institutional control and provides a heightened level of monitoring that is responsive to the needs of intercollegiate athletics and the University community.

The University is accountable for the actions of individuals to whom it delegates authority for its athletics program and, therefore, has clearly communicated compliance expectations and established effective monitoring systems for countable athletically related activities to ensure accountability. The University recognizes that NCAA rules compliance is a collective institutional responsibility, and that many departments and administrators must play important roles in its athletics compliance program. On campus, institutional compliance with NCAA regulations is a shared responsibility through a coordinated process of delegation and distribution of key administrative functions.

The University of Michigan will employ the following procedures to monitor countable athletically related activities for all varsity sports.

- A. **Education.** The Compliance Services Office (CSO) annually reviews NCAA rules involving countable athletically related activities with various constituencies within the Athletic Department. The CSO maintains a log of these meetings and the educational resources provided.
  - 1) **Coaches.** Coaches are provided a memorandum at the start of each academic year reviewing CARA processes and procedures. In addition, during annual in-person rules education meetings NCAA rules regarding countable athletically related activities are reviewed verbally with accompanying written educational resources. The annual meeting also includes sport specific non-coaching staff such as the director of operations. Head coaches are copied on all educational emails provided to student-athletes.



(the email will include a specific due date). The two-week period should accommodate circumstances such as team travel for away competition, postseason competition, and student-athlete injury or illness that can impact a sport's ability to submit the forms in a timely manner. Consideration will be given due to vacation period breaks that occur early in the month in cases where a particular sport's student-athletes are unavailable.

- b. *After two weeks.* Sports that do not submit CARA forms on time will receive a "Final Notice" reminder with copies going to the head coach, the CARA form preparer (if other than head coach), the sport administrator and the athletic director.
- c. *After one additional week.* The General Counsel and the President of the University will be notified of any sports that have not submitted their CARA forms within one week of receipt of the "Final Notice" reminder.

7) Note: The CSO is in the process of developing CARA forms that may be completed on-line for target implementation of Fall 2010. This new system will provide student-athletes the ability to verify and report practice activities to the CSO on a confidential basis.

C. **Site Visits.** Both the CSO and sport administrators will conduct random site visits of practice activities. The CSO will maintain a master grid that documents the site visits. Site visits will occur as follows:

- 1) During the academic year when the sport is in-season.
- 2) During the academic year when the sport is out-of-season.
- 3) During the summer vacation period when only voluntary practice activities may occur.

D. **Senior Exit Interviews.** Sport administrators will ask seniors about potential violations of NCAA rules including violations involving countable athletically related activities.

E. **University Audits.** University Audits will annually review information on selected team CARA forms that supports compliance with NCAA rules in conjunction with their NCAA Directed Review.

