Governance and Commitment to Rules Compliance

Operating Principle

1.2. Rules Compliance.

Membership in the Association places the responsibility on each institution to assure that its staff, student-athletes, and other individuals and groups representing the institution’s athletics interests comply with the applicable Association rules and regulations. Consistent with this responsibility, the institution shall demonstrate that:

a. It has in place a set of written policies and procedures that are clearly communicated to the athletics staff members and those individuals outside athletics who have rules-compliance responsibilities. These written policies and procedures must assign specific responsibilities in the areas of rules compliance, including assignment of direct accountability for rules compliance to the individual the chancellor or president assigns overall responsibility for the athletics program.

b. In critical and sensitive areas, institutional compliance procedures provide for the regular participation of persons outside of the athletics department. The responsibility for admission, certification of academic standing, evaluation of academic performance and administration of financial aid for student-athletes must be vested in the same agencies that have authority in these matters for students generally.

c. Rules compliance is the subject of continuous, comprehensive educational effort to a wide range of constituencies.

d. A clear and unambiguous commitment to rules compliance is a central element in all personnel matters for individuals involved in the intercollegiate athletics program.

e. At least once every four years, its rules-compliance program is the subject of evaluation by an authority outside the athletics department.

Self-Study Items

1. List all “conditions for certification” imposed by the Committee on Athletics Certification in its second-cycle certification decision (if any) as they relate to Operating Principle 1.2 (Rules Compliance). In each case, 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.

Please note, the institution is not required to respond to opportunities for enhancement developed by the peer-review team unless those same items were adopted by the Committee on Athletics Certification.

There were no corrective actions, conditions for certification, or strategies for improvement pertaining to Rules Compliance, Operating Principle 1.2 (Governance and Commitment to Rules Compliance) in the second-cycle certification.
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 second-cycle certification process for Operating Principle 1.2 (Rules Compliance). In each case; provide:
   a. The original plan;
   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 plans.

Please note, the institution will not be required to fulfill an element of a second-cycle plan if the element does not affect conformity with a current operating principle.

There were no corrective actions, conditions for certification, or strategies for improvement pertaining to Rules Compliance, Operating Principle 1.2 (Governance and Commitment to Rules Compliance) in the second-cycle certification.

3. Describe any additional plans for improvement/recommendations as they relate to Operating Principle 1.2 (Rules Compliance) developed by the institution since the second-cycle certification decision was rendered by the Committee on Athletics Certification.

   The institution has not developed any additional plans for improvement/recommendations for Operating Principle 1.2 since the second-cycle certification decision.

4. Describe how the institution ensures that rules compliance is a central element in personnel matters for individuals within the athletics department. Specifically, the institution must provide written evidence that all individuals inside the athletics department (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. Performance evaluations; and
   c. Job descriptions.

Rules compliance is specifically addressed in the OSU Policy and Procedures Statement 1-0401 (General University, July 2008) titled "Employment of Athletic Department Exempt Staff and Intercollegiate Coaches."

The policy establishes all exempt athletic department staff members as "contract employees" on an annual, year-to-year employment basis and as such, the rules compliance provisions of the policy apply to all exempt staff including assistant coaches, the Associate AD for Business Operations and the Associate AD for Compliance.

Obligations regarding rules compliance are stated in two sections of the Policy and Procedure Statement:

- 4.01 - Exempt staff employees of the Athletic Department shall recognize and comply with the policies, rules, and regulations of and governing Oklahoma State University and its employees, the rules of the Big Twelve Conference, and the rules of the National Collegiate Athletic Association, as now constituted or as any of the same may be amended in the future. Head coaches shall also endeavor to ensure that all assistant coaches or any other employees, for whom they are administratively responsible, comply with such policies, rules, and regulations.

- 4.02 - Exempt staff employees of the Athletic Department shall conduct themselves with due regard to public convention and morals, shall not do any act that will tend to degrade them in society or bring them into public hatred, contempt, scorn, or ridicule, or that will tend to shock, or insult the community or offend public morals or decency, and shall not do any act that tends to impair their capacity to fully comply with their obligations as employees of the Athletic Department and the University. Failure to do so constitutes a basis for termination for cause or other disciplinary action by the Director of Intercollegiate Athletics.
Provisions exist for contractual relationships extending beyond one annual term, subject to applicable budget balancing restraints of the Oklahoma Constitution. Such agreements are normally limited to head coaches of intercollegiate athletic teams and the Director of Intercollegiate Athletics. Specific clauses related to rules compliance are included in the individual contracts of certain head coaches.

The institution conducts an inquiry during the recruiting process for head coaches and assistant coaches of the NCAA National Office Enforcement Staff and the Bond, Schoeneck and King Collegiate Sports Law Group to determine if a candidate has a history of NCAA rules infractions.

The performance evaluation criteria for all athletic department employees contains a section where each employee is evaluated on their efforts to comply with all NCAA, Big 12 Conference and Oklahoma State University rules and regulations.

5. Describe how the institution ensures that rules compliance is a central element in personnel matters for individuals outside the athletics department who are involved in rules-compliance activities. Specifically, the institution must provide written evidence that all individuals outside the athletics department 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. Performance evaluations; and
   c. Job descriptions.

   Note: The Committee will need to review contracts or letters of appointment, performance evaluations and job descriptions for all employees in the following areas:
   - Admissions
   - Registrar
   - Financial Aid
   - Bursar
   - Institutional Research
   - Academic Affairs
   - Residential Life

6. Provide the name(s) and title(s) of the individual(s) who has ultimate responsibility in determining student-athletes’ admission to the institution, certification of academic standing, and evaluation of academic performance.

   Admission of Student-Athlete to the Institution- TBA, Director of Admissions
   Certification of Academic Standing- Dr. Celeste Campbell, University Registrar
   Evaluation of Academic Performance- Dr. Celeste Campbell, University Registrar

   Note: in 2.1 Q-5, the new Admission Policy assigns admission decisions regarding students who do not meet written admission policies to the Admissions Review Committee which is under the Director of Admissions, currently an open position.

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 being responsible for the institution’s rules compliance.

   Mike Holder, Vice President of Athletic Programs and Director of Intercollegiate Athletics
   Meredith Hamilton, Associate Professor and Faculty Athletics Representative
8. Identify the individuals inside and outside the athletics department who have rules-compliance responsibilities. Describe the reporting lines for and responsibilities assigned to these individuals, including but not limited to:

a. Faculty athletics representative;
b. Director of athletics;
c. Compliance officer/director;
d. Coaches; and
e. Other key individuals (e.g., admissions director, financial aid personnel, registrar) who are responsible for documenting and monitoring compliance with NCAA rules, including but not limited to:

   (1) Eligibility certification;
   (2) Investigation and self-reporting of violations;
   (3) Monitoring of financial aid; and
   (4) The NCAA Division I Academic Performance Program (APP).

Faculty Athletics Representative (FAR):
- reports directly to the University President and assists the institution in operating its athletics program in compliance with University, Big 12, and NCAA regulations.
- assists the compliance staff in awareness of changes to NCAA and Big 12 regulations and legislation, processing waivers, monitoring educational reviews, and administration of coaches’ rules examinations.
- participates in investigating and reporting violations of rules and regulations of the NCAA, Big 12, and institution.
- serves as an ex-officio member of the University’s Athletic Council and
- serves on the Committee for Governance and Commitment to Rules Compliance.

Director of Athletics:
- reports directly to the University President and is a member of the President’s Executive Team.
- is charged with the administration of the intercollegiate athletic program including ensuring that the operations of the Department are conducted in accordance with NCAA, Big 12 Conference, Oklahoma State University, state and federal regulations.

The Associate Athletic Director for Compliance:
- reports directly to the University President.
- is responsible for developing and administering a comprehensive athletic compliance program.
- is responsible for the oversight of five employees that report directly to the Associate Athletic Director for Compliance. An outline explaining the roles and responsibilities of each member of the Compliance Staff will be available to the review team.

The Associate Athletic Director for Academic Services:
- reports directly to the Provost/ Senior Vice President for Academic Affairs.
- is responsible for the administration of the Joe and Connie Mitchell Academic Enhancement Center (AEC) and Academic Services for Student-Athletes (ASSA).
- oversees the AEC staff including: 9 full-time staff members, 20 facilitators, 1 graduate assistant and 60 -70 tutors charged with maintaining compliance with all NCAA and University regulations for academic integrity.

Head Coaches:
- report directly to the Athletic Director.
- are responsible for administration of their program including the oversight of all assistant coaches, support staff and student-athletes in compliance with NCAA rules. All assistant coaches are
responsible for oversight of their own personal activities regarding compliance as stated in institutional Policy 1-0401.

Athletic Department Support Staff:
- Reporting lines vary depending on Department (head coach or senior level administrator),
- ultimately report to the Athletic Director.
- sign the NCAA Certification of Compliance form and
- understand they are responsible for reporting all violations of NCAA regulations to the Compliance office or Athletic Director's office.

Eligibility certification: University Registrar
- is the Athletic Certification officer for Oklahoma State University.
- reports directly to the Provost/Sr. VP for Academic Affairs
- must sign all Big 12 Eligibility Reports filed with the Conference office prior to participation by a student-athlete in outside competition.

The Big 12 Eligibility Reports are completed by the Administrative Support Specialist in the Registrar's office. This individual maintains all the eligibility records and academic information for the student-athletes. The Administrative Support Specialist reports directly to the Assistant Registrar. The Assistant Registrar assists the Administrative Support Specialist with the completion of the Big 12 Eligibility Report and maintenance of records. The Assistant Registrar reports directly to the University Registrar.

Investigation and self reporting of violations:
Individuals involved in the investigation of inquiries received from the NCAA or the Big 12 Conference about potential NCAA violations are:
- the Faculty Athletics Representative,
- the Associate Athletic Director for Compliance and
- the General Counsel for the OSU/A&M Board of Regents.

Reporting lines for the FAR and Assoc. AD for Compliance are addressed above. The General Counsel for the Oklahoma A&M Board of Regents reports directly to the Board of Regents for the University.

Monitoring of financial aid:
- The institution's Compliance Office has one fulltime staff member responsible for monitoring the institutions compliance with NCAA and Big 12 Conference regulations for financial aid.
- The institution’s NCAA Financial Aid Coordinator reports directly to the Assoc. AD for Compliance.
- The Senior Director of Financial Aid and Scholarships-
  - oversees the disbursement of athletic financial aid and nonathletic aid received by all student-athletes.
  - reports directly to the Provost/Sr. VP for Academic Affairs.
  - assigns the day-to-day monitoring responsibilities to the Senior Financial Aid Counselor who reviews all athletic aid agreements and nonathletic awards and grants. This individual reports to the Assistant Director of Financial Aid and Scholarships who reports to the Associate Director who reports to the Sr. Director.
- The institution's Bursar
  - is responsible for distributing all Athletic Financial Aid.
  - reports to the Vice President for Administration and Finance.

NCAA Division I Academic Performance Program (APP):
- A Programming Specialist for Institutional Research and Information Management
  - is responsible for identifying the cohort members, the retention data, the academic data and graduation data requested by the NCAA for the measurements of the Academic Performance Program.
  - reports directly to the Director of Institutional Research and Information Management.
- The Administrative Support Specialist for the Registrar's office:
  - provides the eligibility data.
  - Reports ultimately to the Registrar as described above in the eligibility certification.
- The Associate Athletic Director for Compliance:
  - reviews all data and
  - makes recommendations for corrections which are reviewed and approved by the Programming Specialist.
9. Indicate by clicking “yes” or “no” in the Athletics Certification Web-based System (ACS), whether the institution has written policies and step-by-step procedures that include assignment of specific responsibilities pertaining to rules compliance. Please note, all policies and procedures must be available during the evaluation visit.

All answers are “YES” to be entered through radio buttons on NCAA website

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<td>c. Transfer-eligibility certification.</td>
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<td>d. Academic Performance Program.</td>
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<td>e. Financial aid administration.</td>
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<td>f. Recruiting.</td>
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<td>g. Camps and clinics.</td>
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<td>h. Investigations and self-reporting of rules violations.</td>
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<td>i. Rules education.</td>
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<td>j. Extra benefits.</td>
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<td>k. Playing and practice seasons.</td>
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<td>l. Student-athlete employment.</td>
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<td>m. Amateurism.</td>
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10. Describe how the institution’s written compliance policies and procedures are communicated on an annual basis to athletics department staff and individuals outside the athletics department with rules-compliance responsibilities.

At the beginning of each academic year the Compliance Office with the assistance of the University President and Athletic Director conducts a Compliance Meeting with all Athletic Department Personnel.
- The President meets with all Athletic Department personnel to stress the importance of compliance with all NCAA, Big 12 Conference and University rules and regulations.
- The Athletic Director also emphasizes the importance of compliance.
- All staff members must sign the NCAA Certification of Compliance document which is kept on file in the NCAA Compliance Office.
- All staff members are reminded of their obligation to NCAA rules compliance and the responsibility to report all NCAA violations of which they have personal knowledge.
- All staff are provided the procedures by which they should report NCAA violations and also the procedures to present the NCAA Compliance office with a rules interpretation inquiry.

The first Tuesday of every month the NCAA Compliance office conducts an NCAA compliance meeting for all coaches and administrative staff with sport specific responsibilities. The NCAA Compliance staff provides coaches and staff with rules education and updates on any and all policies and procedures for compliance-related activities.
The Athletic Department conducts an external staff meeting on Tuesday of every week. A member of the Compliance staff attends the meeting and addresses any compliance-related issues that face these areas (i.e., Development, POSSE, Ticket Office, Athletic Business Office, Athletic Facilities, Marketing, etc.).

The Athletic Department Administration conducts a meeting with all head coaches the second Tuesday of every month. The Compliance staff presents rules education along with updates on policies and procedures to the Head Coaches at this meeting.

The Compliance office staff organizes a Rules Compliance Round Table that includes members of the University Financial Aid office, the University Registrars office and the University Admissions office. This group is currently in transition due to changes in the make-up of several staff members however, the purpose of the meeting is to cover compliance procedures for athletic certification, financial aid and admission.

The Compliance staff with the assistance of the medical training staff and the strength and conditioning staff has developed a committee which will provide each staff an opportunity to review all policies and procedures impacting these areas and address compliance-related issues.

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

   a. **Boosters**
      All new members of the primary Athletic Department Booster Group, The Posse, receive:
      - a welcome letter from the Compliance office informing them of their status as Boosters and directing them to the Compliance web-site at www.okstate.com.
      - a donation acknowledgement letter from the OSU Foundation with the stipulation at the bottom of each letter that all athletic donors are classified by the NCAA as boosters of Oklahoma State University in perpetuity. The statement include contact information for the OSU Compliance Office and encourages the donor to contact the office with questions or concerns.
      Annual members of the Posse, including renewals:
      - are mailed a copy of the institution’s Booster Guide.
      - receive a subscription to *Posse* magazine, which contains a compliance column written by the Assistant AD for Compliance in each issue.

      The Athletic Department website contains an NCAA Compliance link containing booster specific rules education information in an easy to understand format as well as contact information for the Compliance staff.

      The Compliance Office fields an average of ten inquiries per month from boosters by telephone or email. The compliance staff responds to all inquiries and maintains an open door policy of communication with our booster contingency.

      Each of the department’s media guides contains a Compliance page aimed at providing basic rules education information for all OSU fans. Public Service Announcements focusing on rules education are also made before certain home contests (football and basketball).

      The Compliance Staff has also made rules educations presentations to our two largest alumni groups centered in Oklahoma City and Tulsa. Compliance reminders are occasionally included in Posse e-mail blasts that are sent to all members.
Finally, the university sends correspondence to local restaurants, retailers and car dealers at the start of each academic year to remind them of applicable NCAA legislation that pertains to student-athletes and prospects.

**Student-Athletes**
Each fall begins with a required, extensive rules education meeting for all student-athletes covering:
- extra benefits,
- playing and practice season legislation,
- gambling,
- employment regulations,
- agent interactions,
- promotional activities,
- outside competition,
- recruit hosting activities and
- complimentary admissions.

Student-athletes are also given a copy of the Student-Athlete Handbook that contains a summary of the rules education information provided at the fall meeting. The same rules education seminar is conducted throughout the year for all student-athletes who did not attend the initial meetings. The NCAA Compliance office meets with all student-athletes transferring from Oklahoma State University to provide a review of NCAA and Big 12 transfer regulations.

Student-athletes are sent e-mails throughout the academic year by the Compliance Office to remind them of timely issues (ex. gambling in March). These reminders are also posted on a video board located at the entrance of the AEC. Additional rules education reminders are provided to the coaching staff with instructions to cover with their teams.

Each semester, a member of the Compliance Staff meets with the the Student-Athlete Advisory Council to provide answers to compliance-related questions and seek feedback on NCAA legislative proposals.

An important rules education endeavor is the Compliance Staff’s open door policy which encourages student-athletes to visit the office to ask questions. In addition, Compliance staff members travel with different varsity teams throughout the year to foster relationships with student-athletes.

Finally, near the conclusion of the spring semester the Compliance staff holds additional team meetings to review the issues of employment, summer drug testing, and outside competition as well as other topics pertinent to the summer break.

**Athletics Department Staff**
Each fall, the Compliance Office conducts a rules education meeting for all members of the athletics department staff. The University President, Athletic Director and Associate Athletic Director for Compliance address the group and stress the importance of the department’s commitment to rules compliance. In addition, the compliance staff covers some basic rules education information and institutional policy and procedure. Staff are reminded that the Compliance Office maintains an open door policy and all staff are encouraged to inquire if they have NCAA questions or concerns.

The Compliance Office staff meets with representatives from various offices (marketing, business, media relations, etc.) to provide rules education and updates on NCAA legislation. For example, the Strength and Conditioning staff receives reminders each May about voluntary vs. mandatory summer conditioning.

E-mail blasts are also utilized to provide information and updates to the entire department on an as needed basis.

A member of the Compliance Office staff attends weekly meetings with the external affairs unit of the department that includes: POSSE, Development, Ticket Office, Donor Relations, Athletic Director, Facilities and Marketing to address the Compliance issues related to any external strategies or initiatives.
The Assistant AD for Compliance also meets with specific members of the ASSA Staff (tutors, facilitators, etc.) annually to review compliance rules related Academic Misconduct issues. Compliance materials appear in both the Tutor and Facilitator Handbooks. Members of the ASSA Staff are also encouraged to attend the annual Summer Rules Workshop hosted by the Big 12 Conference.

**Coaches:**
In addition to the information provided above, the Compliance Office conducts two meetings a month specifically for coaches:

1. At one, for all coaches, the Assoc. AD for Compliance covers topics including new legislation, playing and practice season issues, financial aid, recruiting rules and documentation, as well as institutional policies and procedures. Last year a “Compliance Cup Competition” at this meeting tested coaches’ knowledge and research ability in regards to the NCAA Manual.
2. At the second, for head coaches and senior athletic staff, The Assoc. AD for Compliance covers additional compliance issues.

The open door policy and occasional team travel by the Compliance staff facilitates rules compliance education opportunities with coaches.

Coaches also receive a series of monthly e-mails from the Compliance staff providing timely reminders and suggestions pertaining to Hot Topics and Rules Education Columns published by the NCAA.

All coaches and sport-specific staff members receive a monthly Recruiting Calendar published by the Compliance Staff. In addition to the sport’s specific recruiting calendar for the month, the calendar contains a section for financial aid, recruiting, and initial eligibility reminders.

Finally, each summer either the Compliance Office or Big 12 Conference staff provide a recruiting and Big 12 rules review prior to the administration of the NCAA Recruiting Exam.

**Faculty:**
The Assoc. AD for Compliance is a member of the institution’s Faculty Council Athletic Committee to provide rules compliance education and information. The committee meets on a monthly basis to discuss athletic issues and their impact on academic initiatives.

The Assoc. AD for Compliance is also an ex-officio member of the Athletic Council, providing rules education and information. The Council is composed of seven faculty members -- one from each college and one appointed by the Faculty Council. The FAR is also an ex-officio member of the Athletic Council where she provides rules education on Conference and national initiatives.

The Compliance Office is currently working with the FAR and the Athletics Council to develop a new and more effective program for providing compliance education to the faculty. The new initiatives will be in place for the 2009/10 academic year.

**Institutional Staff outside the Athletics Department:**
Prior to the 2007/08 academic year the Compliance Staff hosted a bi-monthly roundtable group comprised of members of the Residential Life, Admissions, Registers, Financial Aid, and Bursar Offices leading discussions of NCAA rules, institutional policies and procedures as well as upcoming legislation. In 2007, the roundtable was discontinued in favor of more focused rules education for each office, with the option to call a group meeting should a topic arise that concerns each constituency. Rules education e-mails, phone conversations and in-person meetings now occur with these offices on an as needed basis. Individuals from several of these departments are also encouraged to attend the Big 12 Summer Rules Workshop.

In 2007, the Associate Commissioner of the Big 12 Conference provided a seminar for institutional staff which focused on eligibility certification. In the summer of 2008, the Compliance Office also participated in a seminar aimed at educating on-campus academic advisors on NCAA eligibility rules.
12. Provide the name(s) and affiliation(s) of the individual(s) responsible for conducting the institution’s rules-compliance evaluation. Further, describe the process used in selecting this authority outside the athletics department to ensure the individual(s) does not have day-to-day compliance responsibilities for the institution’s athletics department and is knowledgeable of NCAA legislation and rules-compliance practices. Also, provide the date of the institution’s most recent rules-compliance evaluation.

Chuck Smrt: The Compliance Group, Selected by the Big 12 Conference (http://www.tcgathletics.com/)
Last Evaluation Visit: 2008-2009 academic year

Bond, Schoeneck and King Collegiate Sports Law Group, Independently Contracted by Oklahoma State University Athletic Department
(http://www.bsk.com/groups/service.cfm?type=Collegiate%20Sports%20#350) Last Evaluation Visit: Current Academic Year (The Audit Calendar will be available to the review team)

The Big 12 Conference selected The Compliance Group to conduct audits on behalf of its member institutions through an open bid process. The Athletic Department selected the Bond, Schoeneck and King Collegiate Sports Law Group to conduct annual audits of the NCAA compliance department based on the reputation of the firm and a long standing working relationship with its staff members.

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.

Note: all answers are “YES” to be entered through NCAA website radio buttons

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<td>b. Initial-eligibility certification.</td>
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<td>e. Academic Performance Program.</td>
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<td>f. Financial aid administration, including individual and team limits</td>
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<td>g. Recruiting (e.g., official visit, etc.).</td>
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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 if corrective actions are necessary. In addition, identify the individuals involved with this review.

The rules-compliance evaluation of Oklahoma State University dated 10 March 2008 was electronically distributed to each member of the Rules and Governance Subcommittee on 30 September 2008. The members of the Subcommittee reviewed the document and determined that no corrective measures needed to be taken except what was outlined in the University's response.

15. Identify relevant corrective actions planned as a result of the process described in Self-Study Item No. 14 or actions previously planned or implemented from the most recent rules-compliance evaluation. Provide:
   a. The plan(s) or actions implemented; and
   b. The date(s) of actions taken or specific timetable for completion of the plan(s).

   TBA: Responses are included in the audit document and need to be described in this answer.

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 your most recent rules-compliance evaluation.]

   Will be uploaded with the self-study on or before May 1.

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

   TBA – the committee is developing an answer to this question.