



Karl Idsvoog <idsvoog@gmail.com>

ACT under 17

Johnson, Benjamin <johnson.7149@osu.edu>

Thu, Aug 24, 2017 at 4:47 PM

To: Karl Idsvoog <idsvoog@gmail.com>

Cc: "Caldwell, Emily" <caldwell.151@osu.edu>, "Moormann, Rob" <moormann.3@osu.edu>, "Papacostas, Thomas" <papacostas.1@osu.edu>

Karl,

Between 2012 and 2016, 17 of the 134 football and men's basketball student athletes who were admitted and enrolled scored less than 17 on the ACT.

**Benjamin Johnson**

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johnson.7149@osu.edu news.osu.edu**From:** Karl Idsvoog [mailto:idsvoog@gmail.com]**Sent:** Sunday, August 13, 2017 3:05 PM**To:** Johnson, Benjamin <johnson.7149@osu.edu>**Subject:** ACT under 17

[Quoted text hidden]



March 1, 2017

Professors Karl Idsvoog, Dave Foster, Max Grubb
The Athletic Academic Integrity Project
AcademicIntegrity2017@gmail.com
Phone: 513-646-4953

Dear Professors Idsvoog, Foster, and Grubb:

Thank you for your interest in the efforts that universities make to monitor, review, and address academic issues involving student-athletes and athletic departments across the country. We appreciate receiving your public records request for “[e]very analysis conducted by the university provost’s office [or by an outside contractor/consultant hired by the provost’s office] since January 1, 2011 designed to check for academic corruption in your athletic department.” As summarized below, while we do not have records subject to disclosure under the Ohio Public Records Act, we have undertaken (and continue to undertake) substantial measures relating to academic issues and student-athletes and wish to share that information with you.

Prompted by our President and reported to our Board of Trustees, Ohio State’s own proactive efforts to prevent academic corruption in Athletics began in early 2013, prior to news of the University of North Carolina’s issues referenced in your correspondence. Our review coincided with and supported the university’s development of the Institutional Governance Standards and the Department of Athletics’ Guideline on Impermissible Communication with Other University Units (enclosed), which document the university’s commitment to ensuring appropriate governance over athletics. Our founding principles, in instituting our review, were our commitment to fostering a culture that provides the opportunity to develop our student-athletes through success in academics and competition to achieve excellence in life. We work to educate each student-athlete with quality academic, competitive, leadership and social experiences to build a sense of responsibility and foster an appreciation for life-long learning.

The review constituted a dedicated and coordinated effort to identify and address existing academic issues related to student-athletes, taking into account longstanding resources and processes in place to ensure academic integrity throughout the university. Specifically, the review evaluated Ohio State’s academic practices to ensure effective institutional controls related to the review of student-athletes’ academic and athletic eligibility. The review team included Faculty Athletic Representatives and representatives from the Office of University Compliance and Integrity, the Registrar, Athletic Council, Athletic Compliance, Student-Athlete Support Services, Undergraduate Education, and the Office of Legal Affairs.

This review team evaluated over forty-five potential issues; identified and ensured the clarity of requirements governing each issue; identified “key controls” (evidence of assurance that the applicable requirement was being met) for each issue; and identified operational and control



ownership, reporting rhythm, and oversight. Most significantly, the review team ensured improved and simplified oversight by the Faculty Athletic Council (a committee of the University Senate) and its key subcommittees, thereby ensuring independence of decision-making and oversight over academic issues related to student-athletes. The review team continues to meet twice each year to ensure appropriate oversight.

This linkage of controls to governance supported our ongoing efforts to build and implement the university's Institutional Governance Standards, which document independence of decision-making outside the Athletic Department for issues arising in academics and academic support, admissions, enrollment and financial aid, student conduct, medical and athletic training services, and compliance. In other words, we approached the effort to prevent potential student-athlete academic misconduct consistently with other critical areas of oversight of athletics.

As noted above, the issues Ohio State reviewed far exceeded those identified at UNC, and included (for example): student-athlete preparedness, student-athlete outcomes, course and major "clustering," grade changes, and academic misconduct. The review was constituted to assist the General Counsel in providing legal advice to the university, and these efforts are confidential and protected by the attorney-client privilege. In addition, specific issues and topics addressed may be protected from release under FERPA. Accordingly, we are unable to provide you with copies of this material. R.C. 149.43(A)(1)(v) and *State ex rel. Toledo Blade v. Toledo-Lucas Cty. Port Auth.*, 121 Ohio St.3d 537 (2009).

We hope that this information is helpful and answers your overarching inquiry about what steps Ohio State has taken to ensure athletic academic integrity.

If you have questions, please contact Rob Moormann, Director of Public Records, at moormann.3@osu.edu or 614-247-2260.

THE OHIO STATE UNIVERSITY

Institutional Governance Standards

Standards for Safeguarding
Institutional Governance of
Intercollegiate Athletics

October 21, 2016

Introduction

The Ohio State University, as a world-class research institution, is committed to ensuring its high level athletics program continues to be successfully integrated into its overall educational mission. The University believes it is essential for both the Athletic Department and the University as a whole to operate under a single and consistent governance structure. The University further believes that a successful athletics program adds to community engagement and furthers its public mission.

On December 8, 2013, the Big Ten Conference Council of Presidents/Chancellors approved the Conference Standards for Safeguarding Institutional Governance of Intercollegiate Athletics (Conference Standards). The Conference Standards support the Big Ten's commitment to ensure that high-level athletic programs successfully advance the missions of its top research institutions. This success depends on good governance of athletics to reflect the principles applied to each member institution's academic programs and to support the values of higher education.

A successful athletics program connects the campus to the community in which it is located, and the many constituent groups that take pride in being associated with winning intercollegiate teams. Student-athletes pursue their academic and athletic goals by earning degrees while developing their athletic talents in an environment of high-level competition. Fulfilling the dual role of student and athlete in a manner that demonstrates integrity is a key component of evaluating the University's athletics programs.

Faculty involvement is the cornerstone of the University's commitment to institutional control in the oversight of its athletics programs. Formalizing faculty involvement enables the University to ensure that its athletics programs maintain an environment that fosters academic performance and integrity, and that does not lose sight of the balance between academic and athletic pursuits in the lives of its student-athletes.

Pursuant to the Conference Standards, this document establishes University governance standards that define the authority over, and responsibility and accountability for, the University's intercollegiate athletic programs. Further, this document outlines the structures in place to ensure that each campus unit maintains independence in its decision making regarding student-athletes. These Standards seek to solidify the independence of all University units and ensure that they operate free from undue and improper influence.

I. University Governance over Intercollegiate Athletics

The University assigns responsibility for intercollegiate athletics to the individuals and groups listed below. Where appropriate, units of the University operate with dual reporting relationships to ensure appropriate allocation of authority and accountability. Such reporting relationships are also described below, where they are relevant to the governance of intercollegiate athletics.

A. Primary Authority

1. Presidential Authority

The President of the University, subject to the general oversight of the University's Board of Trustees, has ultimate authority, responsibility, and accountability for the administration of intercollegiate athletics and the Athletic Department. The President reports to the Board of Trustees.

2. Director of Athletics Authority

The President has delegated authority, responsibility, and accountability for the Ohio State Athletic Department to the Vice President/Director of Athletics. This authority includes oversight of athletic development, camps and clinics, communications, event management, facilities, finance, sport administration, and ticketing. This authority also includes responsibility for ensuring appropriate Athletics support for academics, in partnership with the faculty through the Athletic Council and the Faculty Athletics Representative; Athletic Compliance, in partnership with the Office of University Compliance and Integrity; and Medical and Athletic Training Services, in partnership with The Ohio State University Wexner Medical Center. The Director of Athletics reports to the President.

B. Faculty Oversight

1. Athletic Council

The President and the Director of Athletics rely on the University's Athletic Council to advise on issues relating to intercollegiate athletics. The Athletic Council is a committee of the University Senate, the body representing the faculty, administrators and students, in the University's system of shared governance. The Athletic Council is comprised of fifteen members: eight tenure-track faculty members (four selected by the Faculty Cabinet, a committee of the University Senate, and four selected by the President); four students (one graduate student, one graduate-professional student, two undergraduate students); two alumni designated by The Ohio State University Alumni Association; and one staff member selected by the University Staff Advisory Committee. As the agent of the Senate, the Athletic Council develops policies governing intercollegiate athletics, subject to the general authority of the President and the Board of Trustees. The chair of the Athletic Council reports annually to the University Senate.

The Athletic Council operates three standing committees that review specific areas related to intercollegiate athletics. The Academic Progress and Eligibility Committee (AP&E) is comprised of eight faculty members and one student member of the Athletic Council. This Committee is responsible for reviewing all regulations concerning intercollegiate eligibility, and works to ensure that the University's requirements conform to or exceed the standards of the Big Ten Conference and NCAA. The Committee also acts upon petitions on behalf of student-athletes seeking relief from University eligibility requirements.

The Athletic Council's Finance and Facilities Committee (FIFA) conducts budgetary review of the Department of Athletics, sets ticket price and distribution policies, and reviews the use and condition of athletic facilities. The operations of several units within the University, including the Student Athlete Support Services Office, the Athletic Legal Counsel, the Athletic Compliance Office and the Medical and Athletic Training Services have reporting and oversight that are independent of the Athletic Department, but are funded within the Athletic Department budget. These budgetary arrangements are monitored and reviewed by FIFA.

The Athletic Council's Equity and Student-Athlete Well-Being Committee (ESAW) monitors issues of gender and other types of equity related to student-athletes, and monitors all aspects of the well-being of student athletes, including emotional and physical health, personal development, social responsibility, sportsmanship, and ethical conduct.

2. Faculty Athletics Representative (FAR)

The FAR is selected by the President and Athletic Council and provides advice and oversight of the intercollegiate athletics program at the University. The FAR represents the University and its faculty to the NCAA and Big Ten Conference, and other athletic conferences in which the University's student-athletes participate. The FAR also monitors the academic integrity of the intercollegiate athletics program, ensures institutional compliance with NCAA and conference regulations, and serves as the Senior Faculty Advisor to the President and the Athletic Director concerning the administration of the intercollegiate athletics program. The FAR reports annually to the University Senate.

C. Critical Subject Matter Responsibilities

1. The Office of Legal Affairs (Legal Services)

The University's Office of Legal Affairs provides the Athletic Department with legal advice on NCAA and Conference regulations, litigation and contracting, and other legal matters. The Office delegates an attorney to the Athletic Department, the Senior Assistant General Counsel-Athletics/Senior Associate Athletic Director-Legal. This position provides dedicated legal counsel to the Athletic Director and other senior leaders within Athletics. The position reports directly to the University's Senior Vice President and General Counsel and has an administrative reporting line to the Director of Athletics.

2. The Office of Undergraduate Studies (Academic Support)

Academic support services for student-athletes are provided by the Student-Athlete Support Services Office (SASSO). The Director of SASSO reports to the University's Vice Provost for Undergraduate Studies and Dean of Undergraduate Education in the Office of Academic Affairs, who oversees academic programming and support for all undergraduates. This position, in turn, reports to the University's Executive Vice President and Provost. SASSO also has an administrative reporting line to the Senior Associate Athletic Director for Student Services and Sport Administration in the Athletic Department. SASSO's budget and human resources are transferred from the Athletic Department to the Office of Academic Affairs as part of a Memorandum of Understanding, to ensure that SASSO prioritizes academic interests when making academic support decisions.

3. Colleges and Departments (Academic Support)

The University's fifteen colleges, and the academic departments they contain, provide academic advising and academic support services to all students pursuing a degree in the college, including student-athletes. Each college designates advisors to assist student-athletes and to resolve academic eligibility issues, in coordination with the University Registrar in the Office of Enrollment Services.

4. The Office of University Compliance and Integrity (Athletic Compliance)

The Office of University Compliance and Integrity provides the Athletic Department with compliance advice on NCAA and Conference regulations, investigations, and other compliance matters. The Office delegates compliance responsibilities in the Athletic Department to the Associate Athletic Director for Compliance. The position reports directly to the University's Vice President and Chief Compliance Officer in the Office of University Compliance and Integrity, and has an administrative reporting line to the Athletic Director. As documented in a Memorandum of Understanding between the two organizations, budget and personnel decisions are shared, with final decisions made by the Chief Compliance Officer. This arrangement ensures that personnel within the Athletics Compliance organization prioritize compliance principles when making decisions.

The University oversees compliance through the Audit and Compliance Committee of the University's Board of Trustees, and through the University Risk Management Committee. Similar to other key units, the Athletic Department develops and implements an annual compliance plan, reported to each of these Committees on at least a quarterly basis, which is developed by the Athletics Compliance Office. These Committees also exercise oversight by receiving regular reports on proactive risk management and on individual compliance issues (including investigations and potential rules violations) in the Athletic Department.

5. The Office of Enrollment Services (Undergraduate Admissions)

The Office of Undergraduate Admissions is responsible for all aspects of undergraduate admissions for the University, including the admission of prospective student-athletes. The Director of Undergraduate Admissions reports to the Vice President for Strategic Enrollment Planning, who is responsible for all aspects of enrollment planning for the Columbus and four

regional campuses, and the Agricultural Technical Institute. This position, in turn, reports to the University's Executive Vice President and Provost.

Admissions policies are governed by the state of Ohio, and overseen by the Council on Academic Affairs, the Council on Enrollment and Student Progress, and the Faculty Committee on Admissions. The Office of Enrollment Services makes regular reports to the University's Board of Trustees.

6. The Office of Enrollment Services (Graduate and Professional Admissions)

The Office of Graduate and Professional Admissions is responsible for all aspects of graduate and professional admissions for the University, including the admission of prospective student-athletes. The Director of Graduate and Professional Admissions reports to the Vice President for Strategic Enrollment Planning, who is responsible for all aspects of enrollment planning for the Columbus and four regional campuses, and the Agricultural Technical Institute. This position, in turn, reports to the University's Executive Vice President and Provost.

Admissions policies are governed by the state of Ohio, and overseen by the Council on Academic Affairs, the Council on Enrollment and Student Progress, and The Ohio State University Graduate School. The Office of Enrollment Services makes regular reports to the Council of Graduate Studies.

7. The Office of Enrollment Services (Registrar)

In conjunction with other key offices, the Office of the University Registrar is responsible for the certification of initial and continuing academic and competition eligibility and ongoing monitoring of NCAA, Big Ten, and institutional rules to ensure compliance. Along with the Athletic Director and the FAR, the University Registrar approves athletic eligibility certification. The University Registrar reports to the Vice President for Strategic Enrollment Planning, who is responsible for all aspects of enrollment planning for the Columbus and four regional campuses, and the Agricultural Technical Institute. That position, in turn, reports to the University's Executive Vice President and Provost.

Enrollment and academic policies are overseen by the Council on Enrollment and Student Progress, and the Council on Academic Affairs, both committees of the University Senate. Athletic Eligibility requirements are established by the NCAA, the Big Ten and institutional rules.

8. The Office of Student Life (Student Conduct)

The Office of Student Conduct oversees all student conduct issues for the University, including those involving student-athletes. The Director of Student Conduct reports to the University's Vice President for Student Life, who oversees all thirty departments whose operation affects students outside the classroom. This position, in turn, reports to the University's Executive Vice President and Provost.

The University oversees Student Conduct through the University's Board of Trustees, The Vice President for Student Life, The Office of Legal Affairs and the Office of University Compliance and Integrity. The University's Board of Trustees grants authority to the University Conduct Board and Student Conduct hearing officers via the Code of Student Conduct, which is periodically modified by the Board of Trustees and University Senate.

9. OSU Wexner Medical Center (Medical and Athletic Training Services)

Medical and athletic training services are provided to student-athletes in coordination with The Ohio State University Wexner Medical Center and its personnel. Physicians working with the Athletic Department report to the Executive Vice President of Health Sciences, who oversees all the physicians in the Ohio State medical system and serves as the Chief Executive Officer (CEO) of The Ohio State University Wexner Medical Center. This position reports directly to the President of the University.

Athletic trainers report to the Executive Vice President of Health Services via the Team Physician, concerning all student-athlete medical decisions. Additionally, they have an administrative reporting line to the Senior Associate Athletic Director for Student Services and Sport Administration. This arrangement is documented in a Memorandum of Understanding between the Athletic Department and The Ohio State University Wexner Medical Center, which ensures that personnel providing medical and athletic training services prioritize student-athlete health when making decisions.

10. The Office of Enrollment Services (Student Financial Aid)

The Office of Student Financial Aid is responsible for the administration of all financial aid for the University, including student-athletes. The Executive Director of Student Financial Aid reports to the Vice President for Strategic Enrollment Planning, who is responsible for all aspects of enrollment planning for the Columbus and four regional campuses. This position, in turn, reports to the University's Executive Vice President and Provost.

Financial aid policies are governed by the federal Department of Education, the state of Ohio, and institutional policy. Requirements for the administration of athletic aid are established by the NCAA, the Big Ten and institutional policies.

D. Statement of Responsibility for Independence in Decision Making

The individuals, committee members and department staff described above have the authority and responsibility to govern the intercollegiate athletics programs of the University. They shall exercise such responsibility without improper influence from others within or outside the University. These individuals will not encourage inappropriate communication and will report any attempt of improper influence to the President, to the FAR, or to the Office of University Compliance and Integrity, as appropriate.

II. Operational Standards for Athletics

A. Athletic Department Prohibition on Impermissible Communications

All coaches and staff in the Athletic Department are subject to its Impermissible Communications Guideline. This Guideline prohibits coaches and staff from seeking to inappropriately influence decisions in each of the units below.

B. Requirements of Individual Units Outside the Athletic Department

The units identified below operate under requirements that ensure decisions are made in the best interests of the University as an educational institution. Each unit develops its own policies and procedures, allowing it to effectively and independently exercise its responsibilities. The requirements applicable to each unit's responsibilities related to intercollegiate athletics are as follows:

1. The Office of Undergraduate Studies (Academic Support)

SASSO is responsible for developing and implementing a comprehensive academic support program that ensures that student athletes are making progress toward graduation according to the standards set by the NCAA, Big Ten, and the institution. This includes ensuring student athletes are receiving adequate advising, annual progress towards degree reviews and term-by-term reviews of their eligibility status. The following requirements apply to academic support services provided by the University to student-athletes:

- a. Coaches and staff of the Athletic Department have no direct responsibility for, nor exercise undue or improper influence over, the hiring or supervision of any member of SASSO. The Athletic Director provides input into the hiring and supervision of the Director of SASSO to the Vice Provost for Undergraduate Studies and Dean of Undergraduate Education, through the administrative reporting line from the Director of SASSO to the Senior Associate Athletic Director for Student Services and Sport Administration in the Athletic Department.
- b. SASSO monitors and reports data regarding independent studies, courses (i.e., traditional classroom, hybrid in-class and distance education combinations, and distance education), and majors to enable the University to identify and reduce the risk of abusive use of independent studies, and clustering in particular courses or majors by student-athletes. These reports are reviewed by AP&E, the FAR, and the Vice Provost of Undergraduate Studies and Dean of Undergraduate Education.
- c. SASSO, with the support and oversight of the Office of Academic Affairs, provides student-athletes with academic support and counseling that is appropriate for their progress toward a degree and graduation.
- d. All communications between Athletic Department staff and faculty are through the Director of SASSO, his or her designees, or through the FAR, unless specifically outlined in the Impermissible Communications Guideline
- e. The University's Committee on Academic Misconduct (COAM) investigates and

- adjudicates all reports of academic fraud and misconduct by students, including those involving student-athletes. COAM notifies the Senior Associate Athletic Director for Student Services and Sport Administration, and the Senior Assistant General Counsel-Athletics/Senior Associate Athletic Director-Legal, of all academic misconduct allegations and outcomes involving student-athletes.
- f. In support of the Athletic Department's Impermissible Communications Guideline, SASSO staff members and faculty do not encourage inappropriate communication and are encouraged to report any attempt of undue influence by Athletic Department staff members or boosters to the FAR, the Vice Provost/Dean of Undergraduate Education, or the Vice President and Chief Compliance Officer.

2. The Office of University Compliance and Integrity (Athletic Compliance)

The Athletic Compliance Office is responsible for developing and implementing a comprehensive compliance program that ensures that members of the Athletic Department adhere to NCAA, Big Ten and institutional rules. This includes education, monitoring and enforcement concerning NCAA, Big Ten and institutional rules. The following requirements apply to compliance services provided by the University to student-athletes:

- a. Coaches and staff of the Athletic Department have no direct responsibility for, nor exercise undue or improper influence over, the hiring or supervision of any member of the Athletic Compliance Office. The Athletic Director provides input into the hiring and supervision of the Associate Athletic Director for Compliance to the Vice President and Chief Compliance Officer through an administrative reporting line.
- b. The Athletic Compliance Office provides education and monitoring to facilitate the detection and prevention of violations of NCAA, Conference and institutional rules.
- c. The Athletic Compliance Office has increased its staff size to reduce the sport to staff ratio. This ensures that each sports program's compliance needs are adequately addressed. Staffing needs are reviewed regularly.
- d. All communications between Athletic Department staff and the NCAA or Big Ten are routed through the Athletic Compliance Office staff.
- e. In support of the Athletic Department's Impermissible Communications Guideline, Athletic Compliance staff members report any attempt of undue influence by Athletic Department staff members or boosters to the Vice President and Chief Compliance Officer.

3. The Office of Enrollment Services (Undergraduate Admissions)

The Office of Undergraduate Admissions is responsible for the admission, enrollment and orientation for all undergraduate students entering the University. The following requirements apply to University admissions services provided for student-athletes:

- a. The Office of Undergraduate Admissions has the final decision-making authority concerning admission to the University for all students, including student-athletes. Applications of students with special talents that require additional review are

- assessed by the Faculty Committee on Admissions. The Athletic Department has no direct contact with members of the Faculty Committee on Admissions
- b. All communications between Athletic Department coaches and staff and Undergraduate Admissions regarding prospective student-athletes are routed through SASSO staff members.
 - c. In support of the Athletic Department's Impermissible Communications Guideline, Undergraduate Admissions staff members do not encourage inappropriate communication and are encouraged to report any attempt of undue influence by Athletic Department staff members or boosters to the Vice President for Strategic Enrollment Planning or the Vice President and Chief Compliance Officer.

4. The Office of Enrollment Services (Graduate and Professional Admissions)

The Office of Graduate and Professional Admissions is responsible for the admission, enrollment for all graduate and professional students entering the University. The following requirements apply to University admissions services provided for student-athletes:

- a. The Office of Graduate and Professional Admissions oversees the admission of all graduate and professional students to the University, including student-athletes. All applications are reviewed by the appropriate graduate program's faculty, which makes recommendations on admissions according to the program's standards. The Athletic Department has no direct contact with members of The Ohio State University Graduate School or members of Graduate and Professional Admissions.
- b. All communications between Athletic Department coaches and staff and Graduate and Professional Admissions regarding prospective student-athletes are routed through SASSO staff members.
- c. In support of the Athletic Department's Impermissible Communications Guideline, Graduate and Professional Admissions staff members do not encourage inappropriate communication and are encouraged to report any attempt of undue influence by Athletic Department staff members or boosters to the Vice President for Strategic Enrollment Planning or the Vice President and Chief Compliance Officer.

5. The Office of Enrollment Services (Registrar)

The Office of the University Registrar (OUR or Registrar) is responsible for managing academic records and, working closely with other institutional offices, monitoring academic progress for all students, including student-athletes. In conjunction with other key offices, the Registrar is responsible for the certification of initial and continuing academic and competition eligibility. The following requirements apply to services from the Registrar in working with student-athletes:

- a. OUR is a liaison and resource regarding eligibility concerns for multiple constituencies on campus, including Athletic Compliance, SASSO, college offices, Admissions, Financial Aid and the FAR.
- b. OUR facilitates the academic eligibility certification process with Athletic Compliance, SASSO and the college offices.

- c. The Big Ten Certified Eligibility List is produced by this office and signed by the University Registrar, Athletic Director/Senior Women's Athletic Administrator and the FAR.
- d. Data for the NCAA Academic Progress Rate and Graduation Success Rate are collected and submitted to the NCAA by OUR.
- e. In support of the Athletic Department's Impermissible Communications Guideline, OUR staff members do not encourage inappropriate communication and are encouraged to report any attempt of undue influence by Athletic Department staff members or boosters to the Vice President for Strategic Enrollment Planning or the Vice President and Chief Compliance Officer.

6. The Office of Student Life (Student Conduct)

The Office of Student Conduct manages and oversees the University's central student conduct system for all students, including student-athletes. The following requirements apply to the University disciplinary process when a student-athlete is involved:

- a. The Office of Student Life applies the Code of Student Conduct rules, procedures, and sanctions to all students, including student-athletes.
- b. Student-athletes may be subject to additional disciplinary rules and sanctions under the Student-Athlete Standards of Conduct and team-specific policies.
- c. All communications between Athletic Department staff and Office of Student Life staff members involving student-athletes is routed through the Senior Associate Athletic Director for Student Services and Sport Administration.
- d. In support of the Athletic Department's Impermissible Communications Guideline, Office of Student Life staff members do not encourage inappropriate communication and are encouraged to report any attempt of undue influence by Athletic Department staff members or boosters to the Vice President and Chief Compliance Officer.

7. OSU Wexner Medical Center (Medical and Athletic Training Services)

Medical and Athletic Training Services is responsible for student-athlete health and well-being as related to the prevention and treatment of illness or injury of student-athletes. The following requirements apply to medical and athletic training services provided by the University to student-athletes:

- a. Coaches and staff of the Athletic Department have no direct responsibility for, or exercise any undue or improper influence over, the hiring or supervision of any member of the Medical and Athletic Training Services staff.
- b. Athletic training staff members place priority on a student-athlete's health over all other considerations, as required under the Laws and Rules Regulating the Practice of Athletic Training and the University's Athletic Training Manual.
- c. Medical staff place priority on a student-athlete's health over all other considerations, as required by the American Medical Association Code of Medical Ethics.
- d. Coaches and staff of the Athletic Department have no involvement in, or exercise any undue or improper influence over, medical protocols and decisions involving student-

- athletes, including concussed or potentially concussed student-athletes.
- e. In support of the Athletic Department's Impermissible Communications Guideline, Medical and Athletic Training Services staff do not encourage inappropriate communication and are encouraged to report any attempt of undue influence by Athletic Department coaches or staff members, athletic boosters, or others to the University's Executive Vice President of Health Services or the Vice President and Chief Compliance Officer.

8. The Office of Enrollment Services (Student Financial Aid)

The Office of Student Financial Aid is responsible for the administration of all financial aid and individual financial aid decisions affecting students, including student-athletes. The following requirements apply to financial aid decisions involving student-athletes:

- a. The Office of Student Financial Aid has the final decision making authority concerning the administration of financial aid for all students, including student-athletes.
- b. The Office of Student Financial Aid determines the University's cost of attendance for all students, including student-athletes, in accordance with federal guidelines.
- c. Coaches and staff of the Athletic Department have no involvement in, or exercise any undue or improper influence over, the determination of the University's cost of attendance, to better serve recruiting or for any other athletically related interests.
- d. Communications between Athletic Department coaches and staff and Student Financial Aid regarding current and prospective student-athletes are routed through the Athletic Compliance staff members, unless specifically outlined in the Impermissible Communications Guideline.
- e. In support of the Athletic Department's Impermissible Communications Guideline, Financial Aid staff members do not encourage inappropriate communication and are encouraged to report any attempt of undue influence by Athletic Department staff members or boosters to the Vice President for Strategic Enrollment Planning or the Vice President and Chief Compliance Officer.

III. Implementation, Enforcement, Governance, and Reporting of These Standards

A. Implementation

These Institutional Governance Standards are approved by the President and Athletic Director. These Standards are implemented through appropriate procedures (see Appendix A), which may be modified over time as appropriate and needed. Authority to approve changes to the procedures rests in the University's Athletic Council.

B. Enforcement

The University expects compliance with these Standards and will investigate any reports or allegations of non-compliance. The University, through the Office of University Compliance and Integrity, will report to the Conference any violation of these standards in fulfillment of the Conference Standards. The Office of University Compliance and Integrity will be the central

repository for reporting of concerns related to these Standards, and will respond and investigate such concerns as required by University policy.

C. Governance

Governance of these Standards is overseen through the University's Institutional Control Review Committee. The Committee is comprised of leaders (or their delegates) of the units identified in the sections above. The Committee meets at least annually to: 1) review progress under these Standards; 2) review the effectiveness of implementation of the Standards and Procedures, including testing results; and 3) review and approve the University's annual report to the Big Ten Conference prior to submission.

D. Reporting

The University will conduct an annual internal review of these Standards, and will report to the Conference on its compliance with the Conference Standards and taking action to avoid governance-related problems in athletics. The University's Annual Institutional Control Report will include a copy of these Standards, and will submit copies of any revisions to these Standards to the Conference within thirty (30) days after adoption.

Appendix A

Institutional Governance Procedures

Institutional Governance Procedures

These Procedures implement the requirements of the University's Institutional Governance Standards. A summary of applicable requirements is attached as Appendix B.

I. The Office of Undergraduate Studies (Academic Support)

A. Applicable Laws and Regulations

SASSO is governed by NCAA, Big Ten Rules, the Family Educational Rights & Privacy Act (FERPA), and applicable state and federal laws.

B. Applicable Policies and Procedures

SASSO adheres to all institutional rules and regulations as defined within the Office of Academic Affairs Policies and Procedures Handbook and the bylaws of The Ohio State University Athletic Council.

C. Monitoring and Reporting

The following areas are reviewed on a day to day basis and regular reports are listed below.

1. Independent Study Courses

Each semester, the Assistant Provost/Director for Student Athlete Success, in cooperation with the University Registrar, will create a report identifying student-athlete enrollment in independent study courses including aggregate data for each student. This report will be reviewed by AP&E, the FAR, and the Vice Provost for Undergraduate Studies and Dean of Undergraduate Education. This report will be shared with the Athletic Director and the Athletic Compliance Office.

2. Major Clustering

Each semester, the Assistant Provost/Director for Student Athlete Success, in cooperation with the University Registrar, will create a report identifying the enrollment of student athletes by degree program. This report will be reviewed by AP&E, the FAR, and the Vice Provost for Undergraduate Studies and Dean of Undergraduate Education. The results of this report will be shared with the Athletic Director and the Athletic Compliance Office.

3. Individual Course Clustering

Each semester, the Assistant Provost/Director for Student Athlete Success, in cooperation with the University Registrar, will create a report identifying any sections of courses with significant student athlete enrollment. This report will be reviewed by AP&E, the FAR, and the Vice Provost for Undergraduate Studies and Dean of Undergraduate Education. This report will be shared with the Athletic Director and the Athletic Compliance Office.

4. Distance Education

Each semester, the Assistant Provost/Director for Student Athlete Success, in cooperation with the University Registrar, will create a report identifying student-athlete enrollment in distance education courses, including hybrid in-class and distance education combinations. This report

will be reviewed by AP&E, the FAR, and the Vice Provost for Undergraduate Studies and Dean of Undergraduate Education. This report will be shared with the Athletic Director and the Athletic Compliance Office.

5. Academic Misconduct

The University's Committee on Academic Misconduct (COAM) has oversight of all academic integrity issues at the institution. The COAM Coordinator produces an annual report on cases of academic misconduct involving student-athletes, which is provided to the Assistant Provost/Director for Student Athlete Success and the Vice Provost/Dean of Undergraduate Education. The report is also shared with the FAR, the AP&E Committee, and the Athletic Director.

6. Continuing Academic Eligibility

At the conclusion of every semester, SASSO, in cooperation with the University Registrar, creates a continuing academic eligibility summary report that is shared with the Vice Provost/Dean of Undergraduate Education, the FAR, the AP&E Committee, and Athletic Compliance.

7. External Reporting

SASSO supports the University Registrar with data collection and analysis for federal and NCAA reporting including federal graduation rates, the Graduation Success Rate, and the Academic Progress Rate.

II. The Office of University Compliance and Integrity (Athletic Compliance)

A. Applicable Laws and Regulations

The Athletics Compliance Office is governed by NCAA and Big Ten Rules and applicable state and federal laws.

B. Applicable Unit Policies and Procedures

The Athletic Compliance Office operates under a policies and procedures manual that defines its requirements and obligations to ensure adherence to NCAA and Big Ten Rules. This manual serves as the framework for the independent governance of the Athletic Compliance Office.

C. Monitoring and Reporting

1. Annual Compliance Plan

The Athletic Department develops and implements an annual compliance plan defining critical policy, training and process changes to ensure compliance with NCAA and Conference Rules and University policies. Progress under this plan is reported to the Audit and Compliance Committee of the University's Board of Trustees, the FAR, and the University Risk Management Committee on a quarterly basis.

2. Investigations

All investigations conducted by the Athletic Compliance Office are reported to the Office of University Compliance and Integrity, and the FAR. Significant investigations are overseen or

conducted by the Office of Legal Affairs or the Office of University Compliance and Integrity, and are reported to the Audit and Compliance Committee of the University's Board of Trustees.

3. Violations

All violations submitted to the Big Ten or NCAA are reported to the Office of University Compliance and Integrity, the Office of Legal Affairs, the FAR, and AP&E. Significant violations are reported to the Audit and Compliance Committee of the University's Board of Trustees.

III. The Office of Enrollment Services (Undergraduate Admissions)

A. Applicable Laws and Regulations

Admission and enrollment policies are governed by the state of Ohio, the Council on Academic Affairs, the Council on Enrollment and Student Progress (CESP) and applicable state and federal laws.

B. Applicable Unit Policies and Procedures

Admissions policies are developed by the Office of Undergraduate Admissions and are governed by the Faculty Committee on Admissions and Council on Enrollment and Student Progress (CESP).

C. Monitoring and Reporting

The Office of Undergraduate Admissions collects information concerning admissions and reports this information annually to the state of Ohio, the Council on Academic Affairs and CESP. Additionally, Undergraduate Admissions collects information regarding the admission of students, including those with special talents, and reports this information annually to CESP.

IV. The Office of Enrollment Services (Graduate and Professional Admissions)

A. Applicable Laws and Regulations

Admission and enrollment policies are governed by the state of Ohio, the Council on Academic Affairs, the Council on Enrollment and Student Progress (CESP), The Ohio State University Graduate School and applicable state and federal laws.

B. Applicable Unit Policies and Procedures

Admissions policies are developed by the Office of Graduate and Professional Admissions and are governed by The Ohio State University Graduate School and The Office of Enrollment Services.

C. Monitoring and Reporting

The Office of Graduate and Professional Admissions collects information concerning admissions and reports this information annually to the state of Ohio, the Council on Academic Affairs and The Ohio State University Graduate School

V. The Office of Enrollment Services (University Registrar)

A. Applicable Laws and Regulations

Enrollment policies are governed by the Office of Academic Affairs (OAA), the Council on Academic Affairs (CAA) and the Council on Enrollment and Student Progress (CESP). The Office of the University Registrar (OUR) is governed by FERPA, NCAA and Big Ten Rules with regard to student-athletes and eligibility and applicable state and federal laws.

B. Applicable Unit Policies and Procedures

The University Registrar also operates under institutional policies and procedures related to student-athletes and athletic eligibility, as approved by the Athletic Council.

C. Monitoring and Reporting

Working closely with the Athletic Compliance and SASSO, the University Registrar regularly provides data to AP&E. Data for the NCAA Academic Progress Rate and Graduation Success Rate are collected and submitted to the NCAA by OUR.

VI. The Office of Student Life (Student Conduct)**A. Applicable Laws and Regulations**

The Code of Student Conduct, applicable state and federal laws, and other institutional policies delineate prohibited behavior or conduct for all students.

B. Applicable Unit Policies and Procedures

Policies and procedures for investigating and adjudicating conduct cases and student appeals are delineated in the Code of Student Conduct. Procedures for appealing a student conduct case decision or sanctions are also described in the Code of Student Conduct. The practices of Student Conduct staff members for adjudicating student conduct cases are governed by the Code of Student Conduct.

C. Monitoring and Reporting**1. Internal Reporting**

The Office of Student Conduct submits an annual report to the Center for the Study of Student Life which is also a unit within the Office of Student Life.

2. External Reporting

The Office of Student Conduct also contributes data and statistics to the Annual Clery Report that is submitted to the Department of Education by the Department of Public Safety, which is a unit of the University's Office of Administration and Planning.

VII. Medical and Athletic Training Services

A. Applicable Laws and Regulations

The Medical Services area is subject to the Health Insurance Portability and Accountability Act (HIPAA) and FERPA federal regulations and applicable state and federal laws and rules that govern physician and athletic trainer practice, including the code of ethics for those professions. Athletic Trainers report to Ohio State team physicians for all student-athlete medical issues (as required by state law), and report to the Senior Associate Athletic Director for Student Services and Sport Administration for all administrative issues (ex. budget, training, vacation, etc.).

B. Applicable Unit Policies and Procedures

Medical Services has developed a handbook that outlines practices and processes in delivering care to the student-athlete population. This manual serves as the framework for independent practice. The medical services area also follows guidelines as outlined in the NCAA Sports Medicine Handbook.

C. Monitoring and Reporting

Medical Services produces an annual report to the Equity and Student Athlete Welfare (ESAW) Committee of the Athletic Council. Athletic Trainers report all student-athletes with potential medical hardships and medical non-counters to the Athletic Compliance Office.

VIII. The Office of Enrollment Services (Student Financial Aid)**D. Applicable Laws and Regulations**

The Office of Student Financial Aid is governed by the U.S. Department of Education, FERPA, NCAA, Big Ten Rules, and applicable state and federal laws.

E. Applicable Unit Policies and Procedures

Student Financial Aid operates under a manual that outlines policies and procedures to ensure compliance with federal, state, institutional, NCAA and Big Ten Rules and regulations.

F. Monitoring and Reporting

As an institution that participates in Title IV programs, Student Financial Aid undergoes an annual compliance audit which is submitted to the Department of Education. The compliance team within Student Financial Aid coordinates the audit process, including the collection and submission of data and responses.

Appendix B

Applicable Requirements

Applicable Requirements¹

| Unit | Type | Item | Description | Source |
|--------------------------------------|--------------------------------|---|--|--|
| Academic Support Services | Governing Laws and Regulations | Code of Student Conduct (COAM) Rules | Rules governing academic misconduct | Code of Student Conduct |
| Academic Support Services | Governing Laws and Regulations | FERPA Regulations | Federal regulation that protects the privacy of student education records | U.S. Department of Education - FERPA |
| Academic Support Services | Governing Laws and Regulations | NCAA Eligibility Rules | Rules governing NCAA academic eligibility | NCAA Division I Manual |
| Academic Support Services | Governing Laws and Regulations | Big Ten Eligibility Rules | Rules governing Big Ten academic eligibility | Big Ten Manual [Hard copy available upon request] |
| Academic Support Services | Unit Level Procedure | Committee on Academic Misconduct Policies | Procedures for investigating and adjudicating reported cases of alleged academic misconduct for all students | Committee on Academic Misconduct |
| Academic Support Services | Unit Level Procedure | Athletic Council Missed Class Time Policy | Policy regarding student-athlete missed class time for team travel or competition | Athletic Council Bylaws |
| Academic Support Services | Unit Level Procedure | Policies & Procedures Manual | Office of Academic Affairs policies and procedures to adhere to Governing Laws and Regulations | OAA Policies and Procedures Manual |
| Athletic Compliance | Governing Laws and Regulations | NCAA Rules | Rules governing NCAA Division I member institutions | NCAA Division I Manual |
| Athletic Compliance | Governing Laws and Regulations | Big Ten Rules | Rules governing Big Ten member institutions | Big Ten Manual [Hard copy available upon request] |
| Athletic Compliance | Unit Level Procedure | Policies & Procedures Manual | Policies and procedures to adhere to Governing Laws and Regulations | Athletic Compliance Policies & Procedures Manual [Hard copy available upon request] |
| Undergraduate Admissions | Governing Laws and Regulations | Admissions Requirements | Rules governing undergraduate student admissions | Admissions Requirements |
| Undergraduate Admissions | Unit Level Procedure | Admissions Policy | Admissions review policy | [Hard copy available upon request] |
| Graduate and Professional Admissions | Governing Laws and Regulations | Admissions Criteria. | Rules governing graduate and professional student admissions | Admissions Criteria |
| Graduate and Professional Admissions | Unit Level Procedure | Admissions Policy | Admissions review policy | [Hard copy available upon request] |
| University Registrar | Governing Laws and Regulations | FERPA Regulations | Federal regulation that protects the privacy of student education records | U.S. Department of Education - FERPA |

¹ This list is not exhaustive and lists only the most applicable requirements for each unit.

| | | | | |
|----------------------|--------------------------------|---|---|---|
| University Registrar | Governing Laws and Regulations | NCAA Eligibility Rules | Rules governing NCAA academic eligibility | NCAA Division I Manual |
| University Registrar | Governing Laws and Regulations | Big Ten Eligibility Rules | Rules governing Big Ten academic eligibility | Big Ten Manual [Hard copy available upon request] |
| University Registrar | Unit Level Procedure | Athletic Council Eligibility Rules | Rules regarding minimum GPA for student-athlete eligibility | Athletic Council Bylaws |
| University Registrar | Unit Level Procedure | Institutional academic policies and rules | Rules and policies governing enrollment and academics | Faculty Rules, particularly Chapters 3335-8 (Instruction) and 3335-9 (Attendance and Graduation) |
| Student Conduct | Governing Laws and Regulations | Code of Student Conduct | Rules governing student conduct | Code of Student Conduct |
| Student Conduct | Governing Laws and Regulations | Title IX | Federal regulation that protects people from discrimination based on sex in education programs and activities that receive federal financial assistance | U.S. Department of Education - Title IX |
| Student Conduct | Governing Laws and Regulations | FERPA Regulations | Federal regulation that protects the privacy of student education records | U.S. Department of Education - FERPA |
| Student Conduct | Unit Level Procedure | Student Conduct System Process | Procedures for investigating and adjudicating reported cases of alleged student code of conduct violations for all students | The Ohio State University - Student Conduct |
| Medical Services | Governing Laws and Regulations | Laws & Rules Regulating the Practice of Athletic Training | Chapter 4755 of the Ohio Revised Code Chapters 4755-40 to 4755-48 of the Ohio Administrative Code | Occupational Therapy, Physical Therapy, and Athletic Trainers Board |
| Medical Services | Governing Laws and Regulations | HIPAA Regulations | Federal regulation that protects a patient's personal health information | U.S. Department of Health & Human Services - HIPAA |
| Medical Services | Governing Laws and Regulations | FERPA Regulations | Federal regulation that protects the privacy of student education records | U.S. Department of Education - FERPA |
| Medical Services | Unit Level Procedure | Policies & Procedures Manual | Policies and procedures to adhere to Governing Laws and Regulations | The Ohio State University Athletic Training - Policies, Guidelines and Procedures Manual [Hard copy available upon request] |
| Athletic Department | Unit Level Procedure | Student-Athlete Handbook | Additional policies governing student-athlete conduct | Ohio State Department of Athletics-Student-Athlete Handbook [Hard copy available upon request] |
| Athletic Department | Unit Level Procedure | Impermissible Communications Guideline | Guideline for communication between Athletics Department staff members and staff members of specified units on campus. | Ohio State Department of Athletics - Impermissible Communications Guideline [Hard copy available upon request] |
| Financial Aid | Governing Laws and Regulations | US Department of Education Student Financial Aid Handbook | Guidelines for administration of federal student financial aid | Federal Student Aid Handbook |
| Financial Aid | Governing Laws and Regulations | NCAA Financial Aid Rules | NCAA Rules governing distribution of financial aid | NCAA Division I Manual |

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|---------------|--------------------------------|----------------------------------|---|--|
| Financial Aid | Governing Laws and Regulations | Big Ten Financial Aid Rules | Big Ten Rules governing Big Ten financial aid | Big Ten Manual [Hard copy available upon request] |
| Financial Aid | Governing Laws and Regulations | State of Ohio - Board of Regents | State of Ohio Rules governing distribution of financial aid. | State of Ohio Board of Regents |
| Financial Aid | Governing Laws and Regulations | FERPA Regulations | Federal regulation that protects the privacy of student education records | U.S. Department of Education - FERPA |
| Financial Aid | Governing Laws and Regulations | Policies and Procedures Manual | Policies and procedures to adhere to federal, state, institutional, NCAA and Big Ten Rules governing the administration of financial aid. | Policies and Procedures [Hard copies available upon request] |

Department of Athletics Guideline: Impermissible Communication with Other University Units

1. Purpose

- 1.1 As outlined in the institution's Institutional Governance Standards, this guideline ensures that the Other University Units¹ maintain independence in their decision making abilities and freedom from potential Undue Influence from athletics.

2. Guideline

- 2.1 This guideline prohibits Ohio State Athletics Department staff members and boosters from engaging in Impermissible Communication with the staff members of Other University Units regarding student-athletes or prospective student-athletes.

3. Persons Affected

- 3.1 Ohio State Athletics Department staff members
- 3.2 Ohio State Athletics Department boosters
- 3.3 Ohio State University faculty members
- 3.4 The Office of Athletics Compliance
- 3.5 The Office of Undergraduate Admissions
- 3.6 The Office of Graduate and Professional Admissions
- 3.7 The Office of the University Registrar
- 3.8 The Office of Student Conduct
- 3.9 Ohio State Medical and Athletic Training Services
- 3.10 The Office of Student Financial Aid
- 3.11 The Office of University Compliance and Integrity
- 3.12 The Student-Athlete Support Services Office
- 3.13 Faculty Athletics Representative

4. Definitions

- 4.1 "Athletics Department staff members" means all full-time or part-time staff members employed by the Athletics Department, volunteer staff and graduate assistants.
- 4.2 "Booster" means an individual or organization that has ever (1) made financial contributions to the Athletics Department or athletics booster organization of the institution, including the purchase of athletics tickets; (2) provided benefits to student-athletes or their families; (3) assisted in the recruitment of prospective student-athletes, or (4) otherwise promoted the institution's athletics program.
- 4.3 "Faculty members" means all professors, course instructors, teaching assistants, tutors, and college advisors.
- 4.4 "Impermissible Communication" means (1) Undue Influence; or (2) direct communication to Other University Units in violation of the procedures below.

¹ Other units will be added to this guideline as deemed necessary.

- 4.5 “Medical and Athletic Training Services” means team physicians, athletic trainers, physical therapists and any other Ohio State personnel associated with providing medical or athletic training services to student-athletes.
- 4.6 “Other University Units” means faculty members, the Office of Undergraduate Admissions, the Office of Graduate and Professional Admissions, the Office of the University Registrar, the Office of Student Conduct, Medical and Athletic Training Services, and the Office of Student Financial Aid.
- 4.7 “Prospective student-athlete” means an individual who has started classes for the ninth grade and beyond.
- 4.8 “Student-athlete” means an individual on the institution’s squad list for the applicable academic year.
- 4.9 “Student Financial Aid” means staff members in the Office of Student Financial Aid.
- 4.10 “Undue Influence” means undue pressure or insistence encouraging the Other University Unit to act in a manner contrary to its best practices or requirements.
 - 4.10.1 Conversations intended to understand the parameters of the Other University Unit’s practices or requirements do not constitute Undue Influence.

5 Procedures

- 5.1 Except as otherwise noted herein, Athletics Department staff members and boosters will not engage in Impermissible Communication with the staff members of the Other University Units².
 - 5.1.1 Faculty members: All communication from Athletics Department staff members or boosters with faculty members regarding the academics or graduate admission of a student-athlete or prospective student-athlete must be made by the Director of SASSO, his or her designees, the Faculty Athletics Representative, or the Athletics Compliance Office as needed.
 - 5.1.1.1 Exception: communication between an Athletics Department staff member and a faculty member for the purpose of scheduling an academic meeting during a prospective student-athlete’s visit to campus is permitted.
 - 5.1.1.2 Exception: communication between an Athletics Department staff member or booster and a faculty member if such Athletic Department staff member or booster is the parent or legal guardian of the student-athlete or prospective student-athlete.

² Nothing in this guideline is intended to prohibit necessary communications during the course of an investigation of a legal issue, NCAA rules violation, or Student Code of Conduct violation, including an allegation of academic misconduct.

- 5.1.2 The Office of Athletics Compliance: Communications from Athletics Department staff members or boosters which places Undue Influence on the staff members in the Office of Athletics Compliance are Impermissible Communications.
- 5.1.2.1 It is not an Impermissible Communication for Athletics Department staff members or boosters to communicate directly with staff members in the Office of Athletics Compliance
- 5.1.3 The Office of Undergraduate Admissions: All communication from Athletics Department staff members or boosters with staff members in the Office of Undergraduate Admissions regarding scholarships, grants or admission of a prospective student-athlete or student-athlete must be made by a member of the Student-Athlete Support Services Office or Athletics Compliance Office as needed.
- 5.1.3.1 Exception: communication between an Athletics Department staff member or booster and staff members in the Office of Undergraduate Admissions if such Athletic Department staff member or booster is the parent or legal guardian of the student-athlete or prospective student-athlete.
- 5.1.4 The Office of Graduate and Professional Admissions: All communication from Athletics Department staff members or boosters with staff members in the Office of Graduate and Professional Admissions regarding the admission of a prospective student-athlete must be made by a member of the Student-Athlete Support Services Office or Athletics Compliance Office as needed.
- 5.1.4.1 Exception: communication between an Athletics Department staff member or booster and staff members in the Office of Graduate and Professional Admissions if such Athletic Department staff member or booster is the parent or legal guardian of the student-athlete or prospective student-athlete.
- 5.1.5 The Office of the University Registrar: All communication from Athletics Department staff members or boosters with staff members in the University Registrar regarding the academic eligibility of a student-athlete must be made by a member of the Student-Athlete Support Services Office or Athletics Compliance Office as needed.
- 5.1.5.1 Exception: communication between an Athletics Department staff member or booster and staff members in the University Registrar if such Athletic Department staff member or booster is the parent or legal guardian of the student-athlete or prospective student-athlete.

- 5.1.6 The Office of Student Conduct: All communication from Athletics Department staff members or boosters with staff members in the Office of Student Conduct regarding student conduct or academic misconduct issues involving a student-athlete must be made by the Athletics Director or his or her designees.
- 5.1.6.1 Exception: communication between an Athletics Department staff member and a staff member in Student Conduct for the purpose of scheduling a meeting with a student-athlete is permitted provided Student Conduct initiates the contact.
 - 5.1.6.2 Exception: communication between an Athletic Department staff member or booster and staff members in Student Conduct if such Athletic Department staff member or booster is the parent or legal guardian of the student-athlete.
- 5.1.7 Medical and Athletic Training Services: Communications from Athletics Department staff members or boosters with staff members in Medical and Athletic Training Services which places Undue Influence on the staff members in Medical and Athletic Training Services regarding prospective student-athlete or student-athlete health or welfare are Impermissible Communications.
- 5.1.7.1 It is not an Impermissible Communication for Athletics Department staff members to communicate directly with staff members in Medical and Athletic Training Services.
 - 5.1.7.2 It is an Impermissible Communication for boosters to communicate directly with staff members in Medical and Athletic Training Services.
 - 5.1.7.2.1 Exception: communication between a booster and staff members in Medical and Athletic Training Services if such booster is the parent or legal guardian of the student-athlete or prospective student-athlete.
- 5.1.8 Student Financial Aid: All communication from Athletics Department staff members or boosters with staff members in Student Financial Aid regarding the financial aid of a student-athlete or prospective student-athlete must be made by a member of the Athletics Compliance Office.
- 5.1.8.1 Exception: communication between an Athletics Department staff member or booster and staff members in Student Financial Aid if such Athletic Department staff member or booster is the parent or legal guardian of the student-athlete or prospective student-athlete.

5.1.9 The Student Athlete Support Services Office: Communications from Athletics Department staff members or boosters which places Undue Influence on the staff members in the Student Athlete Support Services Office are Impermissible Communications.

5.1.9.1 It is not an Impermissible Communication for Athletics Department staff members or boosters to communicate directly with staff members in the Student Athlete Support Services Office.

5.2 Staff members of the Other University Units are encouraged to report violations of this guideline by Athletics Department staff members or boosters to the Faculty Athletics Representative or Vice President and Chief Compliance Officer.

6 Approvals and Revision History

- 6.1 Approved by Big Ten Working Group –02/23/2015
- 6.2 Approved by Big Ten Working Group Subcommittee – 02/25/2015
- 6.3 Revised to include the University Registrar– 05/27/2015
- 6.4 Revised to include Graduate and Professional Admissions and redefine impermissible communication – 08/20/2015
- 6.5 Revised to include the Student Athlete Support Services Office and redefine undue influence – 12/17/2015