

UNIVERSITY OF LOUISIANA AT LAFAYETTE

Report of Athletics Compliance Assessment

November 15, 2016

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UNIVERSITY OF LOUISIANA AT LAFAYETTE

REPORT OF ATHLETICS COMPLIANCE ASSESSMENT

November 15, 2016

I. INTRODUCTION

This is a Report of an athletics compliance assessment of the National Collegiate Athletic Association (NCAA) rules compliance program at the University of Louisiana at Lafayette (UL Lafayette or Louisiana at Lafayette). At the request of the University, the assessment was conducted and Report prepared by the Collegiate Sports Practice Group of Bond, Schoeneck & King, PLLC (Bond). The University requested a thorough and critical review of its athletics compliance program.

The objectives of the compliance assessment were to:

- ✓ Evaluate the University's existing athletics compliance systems and the ability of those systems to prevent/detect potential violations of NCAA rules;
- ✓ Subject the University's rules-compliance program to evaluation by an authority outside the athletics department;¹
- ✓ Measure the institution's level of control over its athletics program and measure its commitment to compliance with NCAA, Sun Belt Conference and institutional policies.
- ✓ Provide recommendations to the University to enhance its overall athletics compliance program; and

The primary methodologies used in this assessment were the review of requested documentation and in-person interviews conducted on the institution's campus. Information gathered through this process was used to formulate findings and enhancement recommendations for the athletics compliance program. The recommendations for changes or improvements range from those of critical importance to issues that may be smaller in nature. The volume of recommendations, in and of itself, should not be viewed as an indicator of the quality of the current athletics compliance program.

While there are findings made for each area of the athletics compliance program that was evaluated, the Report does not fully detail those athletics compliance operations that are active and functioning appropriately. In fact, the majority of the University's compliance systems function at or above industry standards.

Institutional decisions related to the implementation of recommendations in the Report should involve the President; the director of athletics; the faculty athletics representative (FAR) and

¹ Prior to August 1, 2014, NCAA Bylaw 22.2.1.2-(e) (Governance and Commitment to Rules Compliance) required that such an evaluation be performed once every four years. With the recent adoption of NCAA Proposal 2014-4, the legislated requirements of Bylaw 22.2.1.2 are no longer applicable. The Bond firm believes that as a best practice, an institution should continue to invite periodic outside evaluation of its rules-compliance program.

other University and athletics department administrators, as necessary. Prompt decisions and regularly scheduled post-review evaluations of progress are keys to successful implementation. Additionally, the University may find it helpful to consult with Bond as it works through the recommendations and prepares for the forthcoming audit in year two of the compliance review process.

II. ATHLETICS PROGRAM BACKGROUND

The University is a member of the NCAA Division I Football Bowl Championship Series (FBS) member and the Sun Belt Conference. The institution sponsors eight men's and eight women's intercollegiate athletics teams. UL Lafayette employs a total of 47 coaches (including volunteer coaches and student coaches/managers) and an additional 76 administrative members of the athletics staff.

The institution utilizes the Assistant Coach System (ACS) compliance package to automate various components of the athletics compliance program – particularly the monitoring of playing and practice seasons and on- and off-campus recruiting records. Scott Farmer is the director of athletics and he reports directly to the University's President. Jessica Leger serves as deputy AD and is the University's primary athletics compliance administrator. Leger also oversees the academic support unit for student-athletes. Leger reports directly to the President for athletics compliance matters, the University's Provost for matters involving academic support, and Farmer for all other duties.

III. INDIVIDUALS INTERVIEWED

The following individuals were interviewed during the Bond firm's in-person visit to UL Lafayette's campus on July 12-14, 2016.

Christy Alford, Director for Student-Athlete Academic Center
Jenny Andrew, Associate Head Women's Volleyball Coach
Monique Ardoin, Assistant Director of Athletics for Business Affairs
Lon Badaux, Head Track and Field Coach
Deon Bergeron, Admissions Counselor/Coordinator of Special Cohorts
Garry Broadhead, Head Women's Basketball Coach
Tom Burke, Assistant Director of Athletics for Compliance
Lewis Caralla, Head Strength and Conditioning Coach
Matt Casbon, Director of Ticket Operations
Dustin Daigle, Academic Counselor
Mickey Diez, Registrar
Karmichael Dunbar, Football Student-Athlete
Scott Farmer, Director of Athletics
Jim Harris, Executive Director, Ragin' Cajun Athletic Fund
Anita Hazelwood, Faculty Athletics Representative
Jessica Leger, Deputy Director of Athletics/Senior Woman Administrator
Eric Maron, Director of Marketing and Promotions
Dylan Moore, Baseball Student-Athlete
Tambria Neal-Bradford, Academic Counselor
Cindy Perez, Director of Financial Aid

Jodi Quinn, Women's Basketball Student-Athlete
Russell Register, Compliance Coordinator
Tony Robichaux, Head Baseball Coach
Joseph Savoie, President
Travis Soileau, Director of Athletic Training
Rob Stewart, Associate Director of Athletics for External Affairs
Jonathan Stove, Men's Basketball Student-Athlete
Kim Tanner, Assistant Director of Financial Aid
Connie Thibodeaux, Associate Director of Admissions
Shamona Touriac, Assistant Business Manager – Travel and Data
Alex Way, Women's Tennis Student-Athlete
Lynn Williams, Head Equipment Manager
Katherine Young, Women's Volleyball Student-Athlete

IV. MATERIALS REVIEWED

The following materials were reviewed as part of the compliance assessment:

- A. Louisiana at Lafayette Compliance Manual (2015-16);
- B. Louisiana at Lafayette Department of Athletics Manual (*in draft form*);
- C. Louisiana at Lafayette Department of Athletics website;
- D. Louisiana at Lafayette Student-Athlete Academic Center Academic Coach Handbook;
- E. Louisiana at Lafayette Student-Athlete Academic Center Tutor Handbook;
- F. Louisiana at Lafayette Student-Athlete Handbook (2016-17); and
- G. Louisiana at Lafayette University Athletics Committee meeting agendas and minutes (*July 1, 2014; September 17, 2014; November 12, 2014; March 3, 2015; June 25, 2015; August 27, 2015; October 22, 2015; December 3, 2015; January 26, 2016; February 16, 2016; March 22, 2016; and April 12, 2016*).

V. ASSESSMENT FINDINGS AND RECOMMENDATIONS

This section of the Report includes findings related to the University's current rules-compliance practices in 13 core/primary areas, as well as recommendations to be implemented or considered to strengthen those areas. The findings and recommendations are designed to identify possible areas of concern and facilitate discussion amongst the athletics compliance staff, academic support staff, athletics administrators, the FAR and other key constituent groups regarding the appropriate manner to address those areas.

The findings in this Report are based primarily on institutional staff members' responses to questions developed specifically to test the adequacy of existing athletics compliance systems and communication between campus groups related to NCAA rules compliance.

A. Governance and Organization

UL Lafayette has established the internal structure necessary to share athletics compliance responsibilities and maintain institutional control. It is apparent that rules compliance is seen as a collective institutional responsibility across the UL Lafayette campus and not one

that solely resides within the athletics department. Individuals interviewed as part of this assessment understood that the compliance responsibilities of the athletics department (and in particular, the institution's primary athletics compliance administrator) are extensive, and they demonstrated a collective recognition of the critical roles that other departments and administrators on the University campus have with this combined effort.

The assessment evaluated whether the University:

- | | |
|--|---|
| a. Assigns senior-level institutional administrators to leadership roles in establishing institutional commitment to compliance initiatives? | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| b. Coordinates an institution-wide rules compliance program? | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| c. Develops systems and procedures exemplifying that athletics compliance is a shared responsibility that requires involvement outside the athletics department? | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| d. Defines roles of key compliance personnel (i.e., President, director of athletics, FAR, compliance administrator, University Athletics Committee)? | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| e. Has the director of athletics report directly to the President of the institution? | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| f. Allows the athletics compliance administrator to have access to the President to discuss the matters pertaining to institutional compliance with NCAA (and Sun Belt, if applicable) rules? | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| g. Appoints at least one member of the faculty (or an administrator who holds a faculty rank) as an FAR in the oversight of intercollegiate athletics? | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| h. Provides the FAR with extra resources (e.g., stipend, delineated release time from campus duties, administrative support) to support his/her active involvement in carrying out his/her responsibilities? | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| i. Has the FAR periodically consult the faculty, as a whole or through some representative body (e.g., faculty senate), regarding institutional policies and practices affecting the operation of intercollegiate athletics? | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| j. Ensures that compliance responsibilities are documented in job descriptions, letters of appointment and contracts? | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| k. Requires senior-level administrators to approve compliance policies and procedures? | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |

l. Ensures that institutional staff members (inside and outside of the athletics department) are evaluated periodically on their rules compliance responsibilities?	<input checked="" type="checkbox"/>	Yes	<input type="checkbox"/>	No
m. Takes steps to have an institutional authority outside the athletics department to periodically review the rules compliance program?	<input checked="" type="checkbox"/>	Yes	<input type="checkbox"/>	No
n. Has an athletics advisory board/committee? [It is noted that per Constitution 6.1.2, such a board/committee is not required.]	<input checked="" type="checkbox"/>	Yes	<input type="checkbox"/>	No
o. Requires that members of the faculty and administration comprise a majority of the members of an institutional committee or board according to Constitution 6.1.2?	<input checked="" type="checkbox"/>	Yes	<input type="checkbox"/>	No
p. Has a student-athlete advisory committee and does it provide input on rules-compliance related issues (e.g., practice hours)?	<input checked="" type="checkbox"/>	Yes	<input type="checkbox"/>	No

Recommendations:

1. Ensure that the University's Electronic Compliance/Recruiting Software Package is Used Uniformly and by all Sports

While certain elements of the ACS software package were cited by the athletics department and coaches as generally helpful and/or productive in assisting with the University's athletics compliance efforts, the overall response to the use of the product was mixed. In short, it appears that, for various reasons, certain UL Lafayette sports are not utilizing the ACS system to its fullest capabilities; in some reported instances, coaches are substituting less comprehensive methods of recordkeeping. For a software package to have an optimal effect on an athletics compliance program's monitoring efforts, it should be uniformly adopted and implemented.

2. Redefine the Charge of the University Athletics Committee (UAC) to Increase its Level of Engagement.

Faculty advisory groups are important to the establishment of institutional control at a Division I institution. The role of these groups should include careful review and consideration of matters related to the academic progress of student-athletes, student-athlete welfare and, in some cases, issues related to institutional control. [Note: While input from such groups is important, the group should not have delineated "powers" over decisions involving operational matters of the athletics department.] The University should consider redefining its charge to the UAC to improve its engagement in key areas.

Currently, the UAC reports in an advisory capacity to the President and the director of athletics, and it effectively satisfies certain monitoring elements necessary to

demonstrate institutional control; however, the UAC is not utilized to maximize its potential. While the group meets regularly, a review of the UAC's agendas and minutes, coupled with the direct feedback received during the campus visit, showed that too often, there is little more than a discussion of routine athletics matters.

Expanding the UAC's role could nurture better communication among campus groups, provide athletics with a voice related to policy and procedure development (when needed/requested), and consolidate certain functions (e.g., serve as financial aid and/or transfer appeals group). Additionally, greater UAC engagement could assist in emphasizing the importance of a campus-wide culture of NCAA rules compliance to entities outside of athletics.

3. Explore the Involvement of a Second Faculty Member in the Leadership of the UAC.

A recent trend across the Division I landscape is to engage a second faculty member (other than the current FAR) to "chair" an advisory group such as the UAC. Such a move not only exposes a second faculty member to athletics issues, but also serves as a training ground for a potential FAR candidate once the current FAR reaches the end of her term. [Note: This recommendation is not meant as a condemnation of the current FAR's leadership of this important group and such a change, if adopted, would still have the FAR as a member of the UAC.]

4. Revise UL Lafayette's Athletics Compliance Handbook.

Athletics staff is currently in the process of combining the existing Department of Athletics and Compliance Manuals. Ultimately, the publication will serve as a complete handbook of policies, procedures and resources for UL Lafayette coaches and staff. As a part of this effort, the University should update and/or revise certain existing compliance procedures.²

The final manual should: provide clear instructions on each area of NCAA rules compliance that the program is designed to monitor; identify parties responsible for tasks; establish a timeline associated with the area; and include copies of any necessary forms or instruments used for data gathering and/or monitoring. Additionally, the date and identifying code should be incorporated into each UL Lafayette compliance form and written policy or procedure so that it can readily be determined when and by whom the document was last revised. While the current version of the Compliance Manual provides an overview of the applicable NCAA/Sun Belt legislation in each area and the forms necessary to monitor for compliance, it does not (in all instances) identify the parties responsible for each system and a timeline for the completion of those tasks.

The University should also consider placing the completed Manual (or relevant portions thereof) online so that it can be readily accessed by coaches, athletics staff and other institutional administrators.

² Where appropriate, the Report identifies areas of enhancement for the handbook.

B. Academic Support for Student-Athletes and Academic Performance Program

The SAAC program is appropriately tied to the University's overall efforts to ensure institutional control. The SAAC staff reports directly to the University's Provost. The SAAC unit understands its role within the institutional framework and is actively educated on applicable NCAA legislation and recent infractions cases dealing with academic impropriety and/or academic fraud. The SAAC unit's policies and procedures specify that all tutors annually read and sign a written statement reflecting that they have undergone training that included NCAA rules. Specifically, tutors affirm in writing that they have an understanding of the application of NCAA rules to situations in which they may find themselves.

Further, there is appropriate oversight for the data collection and reporting process for the Academic Performance Rate (APR) and Graduation Success Rate (GSR). The institution has designated the athletics compliance office and SAAC staff members with duties and responsibilities related to the procedures needed to fulfill the essential elements of the Academic Performance Program (APP), including: (1) calculating the APR and GSR; (2) submitting the APR and GSR data online; (3) evaluating and analyzing APR, GSR and retention rate data (including, but not limited to, evaluating the reasons, and developing plans for improvement, if the APR drops below the NCAA minimum standard of 930); (4) maintaining a process to develop and implement plans of improvement relating to the Academic Performance Program (APP); and (5) sharing APP data with coaches/athletics staff, as well as the President and FAR.

The assessment evaluated whether UL Lafayette:

- | | | |
|---|---|--|
| a. Has an academic support staff established to provide services exclusively to the student-athlete population? | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No |
| b. Periodically reviews the support services offered to student-athletes (e.g., at least every two years) by institutional officials not reporting to the athletics program or an outside entity? | <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No |
| c. Possesses written policies and procedures related to the academic support program for student-athletes, Academic Performance Program and Academic Progress Rate monitoring? | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No |
| d. Retains written policies for, and provides training to, tutors assisting student-athletes? | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No |
| e. Periodically reviews course and major selections by student-athletes to address any potential issues related to "clustering?" | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No |
| f. Possesses written policies for the enrollment and completion of nontraditional coursework for student-athletes and transfer student-athletes? | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No |

g. Provides training and education designed to detect, deter and prevent academic fraud and misconduct among the student-athlete population?	<input checked="" type="checkbox"/>	Yes	<input type="checkbox"/>	No
h. Possesses written policies and procedures related to student academic disciplinary procedures?	<input checked="" type="checkbox"/>	Yes	<input type="checkbox"/>	No
i. Has in place a written policy stating that coaching staff members may not contact faculty to discuss matters related to the academic performance of their student-athletes?	<input checked="" type="checkbox"/>	Yes	<input type="checkbox"/>	No
j. Mandates that the academic support program for student-athletes maintains an organizational reporting line outside of athletics?	<input checked="" type="checkbox"/>	Yes	<input type="checkbox"/>	No

Recommendations:

1. Move Away from the Use of the Title “Academic Coach” for Individuals Utilized by the SAAC.

Currently, the services offered by SAAC incorporate the use of an “academic coach” to assist student-athletes, primarily with time management. While it is understood that these individuals do not deal with anything content-related (e.g., the “academic coaches” do not advise or tutor student-athletes), a more appropriate title should be sought for the individuals serving in this capacity (e.g., “mentor”) to avoid any inference that these individuals are either (1) members of the UL Lafayette coaching staff and/or (2) assisting with academic (i.e., content) advising.

2. Subject the Academic Support Program to External Evaluation.

The institution should develop (and include in its Athletics Compliance Handbook) a written policy and procedure requiring that all academic support services provided to student-athletes be subject to a comprehensive, written evaluation and approval by appropriate academic authorities outside of athletics who do not have day-to-day responsibilities in the academic support services area (e.g., faculty members, non-institutional academic support specialists).³

3. Emphasize Existing Policies Regarding Coach Contact With Faculty Members.

Educate coaches on the University’s written policy stating that coaching staff members may not contact faculty to discuss matters related to the academic performance of their student-athletes. Various coaches reported that they were unaware of such a policy.

³ The previous standard in this area was defined by the then NCAA athletics-certification standards — Operating Principle 2.2 (Measurable Standard No. 8) – those standards required the academic evaluation to occur at least once every four years. We recommend that the institution consider conducting these evaluations on a more frequent basis (e.g., annual, biennial)

C. Eligibility Certification (Initial, Continuing and Transfer)

Generally, the systems and procedures in this area are engaged and functioning. UL Lafayette student-athlete eligibility is being properly certified; however, reassigning and redefining the key tasks and responsibilities properly in the eligibility-certification process should occur. Specifically, the process currently relies too heavily on the work of the Student-Athlete Academic Center (SAAC) staff and needs to incorporate more involvement from the Office of the Registrar.

Through interviews associated with this assessment, it was apparent that the Office of the Registrar is not involved in the certification of UL Lafayette student-athlete eligibility at an appropriate level to demonstrate institutional control. The Registrar only reviews a select number of eligibility determinations, and the number of such reviews is subjective at best. In order to demonstrate institutional control in this area, the Registrar needs to review each eligibility determination for accuracy before a UL Lafayette student-athlete is permitted to represent the University in athletics competition.

The University utilizes a workflow chart as a procedural reference, and all prospective/returning student-athletes are identified and evaluated for fulfillment of their applicable eligibility requirements. Although this process is effective, it could be aided by a more robust set of written procedures. Appropriately, the SAAC performs an independent, non-athletics analysis of the eligibility status of all UL Lafayette student-athletes and that eligibility analysis involves officials from UL Lafayette's respective colleges (e.g., Deans, Associate Deans) to verify degree-completion percentages. This data is then reviewed for accuracy by the SAAC and athletics compliance staffs.

It was reported that the University has purchased (and will implement in the spring of 2017) DegreeWorks™, an automated software system that will help to minimize errors and increase the efficiency of the process. The use of this software, coupled with redefining the Registrar's responsibilities in this area, will help to minimize this risk.

The assessment evaluated whether UL Lafayette:

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|---|---|-----------------------------|
| a. Has written policies in place for verifying and monitoring the eligibility (initial, continuing and transfer) of all student-athletes? | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No |
| b. Mandates that all decisions regarding the admission of student-athletes made by institutional personnel who have authority for these matters for students generally and who are not affiliated with the athletics program? | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No |
| c. Has a copy of the institution's published entrance requirements (including provisions under which students may be admitted by special exception to the institution's standard or normal entrance requirements)? | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No |
| d. Has established a system for verifying and monitoring the eligibility of all student-athletes? | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No |

- | | | |
|--|---|--|
| e. Requires that all determinations of eligibility (e.g., progress-toward-degree requirements, transfer regulations) made or reviewed by institutional personnel who are not affiliated with the athletics program? | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No |
| f. Ensures the use of the NCAA Eligibility Center to determine the validity of the information on which the initial-eligibility status of a student-athlete is based? | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No |
| g. Has systems in place to ensure the accuracy and acceptability of any credits and grades earned from other educational institutions (including credits/grades earned in summer school and/or through correspondence courses)? | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No |
| h. Requires an official outside of athletics (e.g., office of the registrar) to validate good academic standing and progress-toward degree requirements (including the six-hour rule) for all student-athletes? | <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No |
| i. "Flags" or codes student-athletes in its mainframe computing system to ensure that course "drops" below full-time enrollment that might adversely affect eligibility are immediately brought to the attention of the athletics compliance and academic support staff? | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No |
| j. Has written policies and procedures regarding team travel and the eligibility of student-athletes therein? | <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No |

Recommendations:

1. Redefine the Role and Responsibilities of the University Registrar as the "Certifying Officer."

As detailed in the findings above, the University's current systems utilize individuals outside of the athletics department to perform the work in this area; however, the current role of the Registrar in this process is too minimal.

The University should incorporate the Registrar into the eligibility-certification process as the "certifying officer" and require that the Registrar review and verify all eligibility decisions rendered for UL Lafayette student-athletes.

2. Provide Greater Detail to the Written Procedures in the Athletics Eligibility Certification Area.

Set forth in greater detail the compliance oversight responsibilities for athletics eligibility certification of student-athletes, and the specific procedure to certifying eligibility. While the workflow chart is effective, elaborating on the process would serve to minimize mistakes in the process. Each step in the process, from advising student-athletes to final certification of eligibility, should be evaluated annually to

ensure that written procedures/forms: accurately reflect current practices; account for applicable NCAA, Conference and University regulations; accurately document the decision-making process; and provide appropriate checks and balances.

3. Increase Timeliness of Transfer Student Transcript Evaluation.

This area was identified by the coaches interviewed in this assessment as problematic inasmuch as it impacts the recruiting process. The parties involved need to focus efforts to increase the speed of the turnaround time with these evaluations.

4. Ensure All Relevant Campus Departments are Educated on the Written Policy Concerning Significant Increases in Prospective Student-Athlete Standardized Test Scores.

While the athletics department has developed and implemented a policy and protocol to flag and report significant increases in standardized test scores – and this system is functioning within athletics at the appropriate level – other campus administrators (i.e., admissions) reported that they are not familiar with the policy/protocol and have no role in it.

Compliance administrators should continue to share the policy/protocol with other campus offices that review student-athlete standardized test scores as part of their day-to-day responsibilities. Doing so will heighten awareness of the issue and serve as a second check to minimize risk.

5. Create Team Travel Procedures.

The University needs to create team travel procedures and an associated Travel Manifest Form to ensure that all personnel (e.g., student-athletes, coaches, managers) making a particular away-from-home trip are identified and cleared prior to departure. Additionally, the athletics compliance office and SAAC units should receive copies of these travel itineraries.

6. Explore All Facets of the Future Degree Audit System.

The University will begin to utilize DegreeWorks™ in the spring of 2017. The software is a web-based, degree audit and academic advising tool designed to enhance the academic planning process. It was reported that the University will examine the capabilities of the system to completely automate the continuing-eligibility process (e.g., utilize the system to apply NCAA degree-progress thresholds).

The University should also explore the feasibility of utilizing additional capabilities of the system to further automate the eligibility-certification process. Among those capabilities is a “what if” application of the system that would let the Office of the Registrar and SAAC forecast potential degree program changes for student-athletes and whether those changes would have an impact on continuing eligibility-certification decisions.

D. Financial Aid Administration

The institution has procedures in place to monitor institutional (athletics and non-athletics) and outside financial aid, and there is adequate communication between the athletics compliance office and the Office of Student Financial Aid. Further, the institution has established the necessary procedures for accurate and timely completion and monitoring of the NCAA financial aid squad list for each sport. Within those procedures, key tasks and responsibilities have been assigned to the individuals involved in the financial aid process.

The assessment evaluated whether the University:

- | | | | | |
|--|-------------------------------------|------------|--------------------------|-----------|
| a. Has institutional personnel who are not affiliated with the athletics program make decisions regarding the awarding of financial aid for student-athletes? | <input checked="" type="checkbox"/> | Yes | <input type="checkbox"/> | No |
| b. Has a system for verifying and monitoring the awarding of financial aid for all student-athletes? | <input checked="" type="checkbox"/> | Yes | <input type="checkbox"/> | No |
| c. Mandates that all financial aid agreements are signed by financial aid authorities, rather than athletics personnel? | <input checked="" type="checkbox"/> | Yes | <input type="checkbox"/> | No |
| d. Ensures that Divisional minimum financial aid limitations (as specified in Bylaw 20.9.3.2) are satisfied? | <input checked="" type="checkbox"/> | Yes | <input type="checkbox"/> | No |
| e. Ensures that total financial aid limitations for each sport (as specified in Bylaw 15.5) are not exceeded? | <input checked="" type="checkbox"/> | Yes | <input type="checkbox"/> | No |
| f. Ensures that financial aid limitations for individual student-athletes are not exceeded? | <input checked="" type="checkbox"/> | Yes | <input type="checkbox"/> | No |
| g. Conducts periodic monitoring of compliance with institutional policies and procedures and NCAA regulations regarding the awarding of athletics grants-in-aid? | <input checked="" type="checkbox"/> | Yes | <input type="checkbox"/> | No |
| h. Has an established grievance process for the reduction or cancellation of individual student-athlete's grants-in-aid? | <input checked="" type="checkbox"/> | Yes | <input type="checkbox"/> | No |
| i. Provides each student-athlete who is receiving athletics aid with a financial aid agreement stating the amount, duration, conditions and terms of the award, as required in Bylaw 15.3.2.2? | <input checked="" type="checkbox"/> | Yes | <input type="checkbox"/> | No |

Recommendations:

1. Check All Calculations Used In the Production of NCAA Squad Lists With Financial Aid.

The University needs to ensure that all financial aid calculations performed within athletics (e.g., weighted average of room costs, off-campus living allowances) that

may impact a student-athlete's individual equivalency limit, and subsequently the applicable team limits, are checked annually with the financial aid office to ensure accuracy.

2. Ensure that the Office of Financial Aid is Informed of All Student Assistance Fund Disbursements.

The University needs to ensure that all disbursements made through the NCAA Student Assistance Fund (SAF) are communicated to the office of financial aid. Per applicable Federal financial aid legislation, SAF disbursements need to be reported for all recipients.

3. Define a Regular Schedule to Audit Student-Athlete Financial Aid.

Currently, this area needs more frequent reconciliation to ensure that errors have not occurred with individual and team award limitations, grant-in-aid and cost of attendance values utilized for student-athletes, and non-athletics institutional aid. A committee (e.g., UAC) or individual external to the athletics department should be charged with oversight of financial aid issues and/or systems. This should be either a financial aid office representative or the committee/individual selected to provide oversight of the entire compliance program.

E. Recruiting

Key tasks and responsibilities in the recruitment monitoring process have been identified and assigned to the athletics compliance staff, coaches and other institutional staff members, and the institution does an adequate job of monitoring on- and off-campus recruiting activities utilizing the ACS software package and selected compliance forms. Additionally, solid lines of communication are established and maintained between the athletics department and other offices on the UL Lafayette campus (e.g., admissions and financial aid) for purposes of prospective student-athlete recruitment.

The assessment evaluated whether the University:

- a. Has written policies and procedures governing the recruitment of prospective student-athletes? Yes No

- b. Monitors that only those coaches who have been certified in accordance with NCAA Bylaw 11.5 (Certification to Recruit Off Campus) may contact or evaluate prospective student-athletes off campus? Yes No

- c. Prohibits contact with prospective student-athletes by athletics program boosters (i.e., representatives of athletics interests)? Yes No

- d. Requires that NCAA rules regarding acceptable and prohibited recruiting practices be explained at least annually to all recognized booster organizations? Yes No

-
- e. Ensures that all athletics program personnel who may be involved in recruiting student-athletes participate in annual (or more frequent) continuing education regarding NCAA (and Conference, if applicable) recruiting rules and the intent of those rules? Yes No
-
- f. Conducts periodic monitoring of compliance with recruiting policies and procedures and periodic review of recruitment-monitoring documents by a senior-level administrator (e.g., compliance official, faculty athletics representative, director of athletics)? Yes No
-
- g. Requires that all expenses associated with the recruitment of student-athletes are reviewed on a timely basis by an institutional official who is not associated with the athletics program (e.g., business office)? Yes No
-

Recommendation:

Enhance Monitoring Activity Relating to Unofficial Visits.

Unofficial visits, and how prospective student-athletes travel to and from those visits, have become an area of increased analysis by the NCAA enforcement staff. In response to this increased scrutiny, the University has enhanced its compliance policies and procedures with respect to unofficial visits. The institution should continue to improve the rules education and documentation of activities during unofficial visits to the campus by prospective student-athletes (as well as the individuals who accompany the prospect) by keeping up with national trends in this area and asking pertinent questions of those involved in the visit. This increased scrutiny relates directly to the arrangements (if any) that were made in conjunction with the visit (e.g., hotel rooms, meals, complimentary tickets) for both the prospect and anyone who accompanies the prospect.

F. Amateurism

UL Lafayette's current systems ensure that all prospective student-athletes are registered with the NCAA Eligibility Center and have completed the required documentation and information regarding amateurism certification.

The assessment reviewed whether the University:

- a. Requires the use of the NCAA Eligibility Center to determine the validity of the information on which the amateur status of a student-athlete is based? Yes No
-
- b. Ensures the accuracy and completeness of the prior athletics competition record on which determinations of amateurism are based? Yes No
-

Recommendations: There are no recommendations in this area.

G. Extra Benefits and Awards

The athletics compliance systems for monitoring the receipt of impermissible benefits by student-athletes are actively engaged and the University has established systems of control to monitor the area of awards and benefits (e.g., travel expenses, awards, equipment and apparel, complimentary admissions, occasional meals, student-athlete opportunity fund, etc.). In this regard, UL Lafayette appropriately monitors: (1) complimentary admissions for student-athletes; (2) permissible and impermissible expenses for practice and competition (e.g., travel expenses); and (3) the receipt of permissible and impermissible benefits, expenses, gifts and services by student-athletes (e.g., telephone calls, travel expenses, trips home).

The assessment evaluated whether the University:

- | | | | | |
|---|-------------------------------------|-----|-------------------------------------|----|
| a. Has written policies and procedures in place to monitor extra benefits and awards provided to student-athletes? | <input checked="" type="checkbox"/> | Yes | <input type="checkbox"/> | No |
| b. Has controls in place to monitor and account for athletic equipment and apparel for student-athletes? | <input type="checkbox"/> | Yes | <input checked="" type="checkbox"/> | No |
| c. Ensures that all ordering and receiving of athletic equipment is centralized within the department (e.g., coaches do not order and/or receive equipment directly from the manufacturer)? | <input checked="" type="checkbox"/> | Yes | <input type="checkbox"/> | No |
| d. Monitors complimentary admissions provided to student-athletes? | <input checked="" type="checkbox"/> | Yes | <input type="checkbox"/> | No |
| e. Ensures that student-athlete vehicles are monitored? | <input checked="" type="checkbox"/> | Yes | <input type="checkbox"/> | No |
| f. Has policies and procedures designed to monitor team travel expenses and activities? | <input checked="" type="checkbox"/> | Yes | <input type="checkbox"/> | No |
| g. Ensures that there is a written policy for complimentary admissions provided by coaches, sport-specific personnel, administrators and other athletics staff? | <input checked="" type="checkbox"/> | Yes | <input type="checkbox"/> | No |

Recommendations:

1. Explore New Strategies for Monitoring the Complimentary Ticket Recipients of Baseball, Football and Men's Basketball Student-Athletes.

The University should amend its current procedures for complimentary admissions for student-athlete guests to require more information about those individuals' identities and their relationships with UL Lafayette student-athletes.

At the beginning of each academic year, the athletics compliance office should continue its practice of meeting with each UL Lafayette intercollegiate team to explain NCAA bylaws and Sun Belt rules and regulations that pertain to complimentary admissions. Prior to the first contest for each respective sport, every student-athlete submits the name, relationship and phone number(s) of any and all individuals who may attend a University, Sun Belt or NCAA sponsored event (in which the student-athlete may compete) to the athletics compliance office. The athletics compliance office should maintain a master list of all names submitted, and randomly contact individuals on the master lists to verify the individual's relationship with the student-athlete and to ensure that nothing of value was provided to the student-athlete in exchange for being placed on the complimentary admissions list (e.g., cash or the equivalent, tattoos, clothing).

As the season progresses and student-athletes place additional guests on the complimentary admissions list, all guests must be approved by the athletics compliance office before they can be provided a complimentary admission.

Additionally, the University should continue to request that student-athletes identify the relationship for all guests receiving complimentary admissions. Even though this is no longer a legislated requirement, it remains a best practice.

2. *Revise Existing Compliance Systems Designed to Monitor Off-Campus Housing.*

The University should revise its current system designed to monitor student-athletes' off-campus living arrangements. For higher-risk scenarios (e.g., a group of student-athletes living together), student-athletes should be required to provide: a copy of the lease/rental agreement; the name and contact information for their landlord; and the cost of rent for the week/month/semester.

3. *Explore Acquisition of an Electronic Inventory Management System for the Equipment Area.*

The equipment personnel interviewed in this assessment stated the unit's desire is to purchase an electronic system for this function to control inventory. Such an acquisition appears appropriate and will address the issues identified with respect to monitoring this area.

H. *Student-Athlete Employment*

The University has adequate systems and procedures in place regarding the monitoring of UL Lafayette student-athlete employment. It was reported that there is not a large population of student-athletes who work in or around Lafayette during the academic year or summer period, therefore the systems are seldom used.

The assessment evaluated whether UL Lafayette:

- a. Has written policies and procedures for both student-athletes and employers regarding the employment of student-athletes? Yes No
-
- b. Makes site visits to off-campus employers/job locations known to employ student-athletes? Yes No
-

Recommendation:

Educate Local and Campus Employers Known to Employ Student-Athletes.

The University should provide educational materials concerning extra benefits and preferential treatment to local Lafayette/New Orleans area employers known to employ student-athletes. The University should also consider making site visits to meet in person with employers that frequently hire student-athletes. Such outreach by the compliance staff would help to ensure that student-athletes are being paid for work performed and at a rate commensurate with the area.

I. Camps and Clinics

UL Lafayette's policies and procedures in the camps and clinics area meet industry standards and best practices. Further, the institution has assigned responsibilities for monitoring institutional camps and clinics (e.g., what documents are submitted to whom and when).

The assessment evaluated whether UL Lafayette:

- a. Has written policies and procedures that govern the operation of camps and clinics? Yes No
-
- b. Allows coaching staff members to "own" institutional camps and clinics? Yes No
-
- c. Ensures that the written policies and procedures in this area require that those to be employed by the camp or clinic identify the individuals to be employed prior to the camp or clinic? Yes No
-
- d. Necessitates that operators of institutional camps or clinics detail expenses and revenue associated with the conduct of the camp or clinic? Yes No
-
- e. Requires that the financial information related to the "camp store" is included in the camp's financial documents, which can be audited? Yes No
-

- | | |
|---|---|
| f. Has procedures in place related to campers attending portions of camps (e.g., half-day, "menu" pricing) and paying a prorated camp fee? | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| g. Specifies that camps or clinics owned by members of the coaching staff that are held off campus are monitored consistent with University policies and applicable NCAA legislation? | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |

Recommendations: There are no recommendations in this area.

J. Playing and Practice Seasons

UL Lafayette monitors countable athletically related activities (CARA), contest limitations and requires days off for each student-athlete during the playing season and outside the playing season. The athletics compliance office has implemented systems to monitor playing and practice season declarations, dates of competition/contest limitations, and daily/weekly countable athletically related activities CARA restrictions.

The assessment evaluated whether the University:

- | | |
|---|---|
| a. Regularly monitors the extent to which the time devoted by student-athletes to athletics pursuits intrudes on the time required for their academic progress or limits their opportunity to participate in campus life? | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| b. Has established written policies related to the scheduling of intercollegiate athletics competition to help minimize the number of classes missed? | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| c. Educates student-athletes and coaching staff members on voluntary activities? | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| d. Requires each intercollegiate sport to declare its playing season, in writing, prior to the start of the academic year? | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| e. Requires that each intercollegiate sport's competition schedule be declared, in writing, prior to the beginning of each academic year? | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |

Recommendation:

Maintain and Record On-Field Monitoring Activities.

The institution should continue to conduct on-the-field monitoring activities of the practices and contests of all sports teams. The athletics compliance staff should

establish a consistent approach for the conduct of all monitoring activities, including, but not limited to: monitoring practices, locker rooms and sidelines (during contests); and checking transportation prior to a sports team's travel to an off-campus athletics event. Further, the athletics compliance staff should maintain a comprehensive record/log of all its monitoring activities.

K. Rules Education

The athletics compliance office provides comprehensive rules education on a consistent basis to UL Lafayette athletics staff and individuals outside the department of athletics who have athletics compliance responsibilities. This is completed through the use of traditional means (e.g., monthly meetings, emails, written materials), as well as through other techniques. The current program meets or exceeds industry standards but, as with any NCAA rules-education program, greater attention can always be provided in this critical area.

The assessment tested whether the University:

- | | |
|--|---|
| a. Has an ongoing educational program for all individuals associated with the athletics program, including boosters, institutional staff members, student-athletes and athletics department staff? | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| <hr/> | |
| b. Describes, in writing, its rules education program, including the frequency of all routinely scheduled meetings and a description of the groups in attendance at those meetings? | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| <hr/> | |
| c. Provides education and a system for the University's head coaches to document control of their program consistent with Bylaw 11.1.1.1? | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| <hr/> | |

Recommendations:

1. Continue Extensive and Varying Rules Education Activities and Techniques.

The athletics compliance office is encouraged to continue its use of varying methods to convey pertinent NCAA athletics compliance information (i.e., workshops/seminars, student-athlete handbook, athletics compliance handbook, compliance website, brochures, electronic materials, examinations, videos and small-group discussions).

Additionally, the rules education program needs to continue to educate any outside consultants, and individuals from offices such as the Registrar and Financial Aid should be encouraged to attend Conference or regional professional association meetings. Specifically, the University Registrar should attend the NCAA Regional Rules Seminars.

2. Continue to Enhance UL Lafayette Booster Education.

The institution should increase the frequency and scope of its rules education to alumni and athletics booster organizations. The rules education program should provide detailed information relating to areas or issues impacting alums and boosters including, but not limited to, extra benefits, recruiting and student-athlete employment.

Additionally, a one-page primer covering applicable NCAA rules on extra benefits, contact with student-athletes and recruiting should be created for boosters accompanying UL Lafayette teams on away-from-home trips (e.g., charter travel for football and basketball). These trips create an optimal environment for individual education of the University's most involved boosters.

Further, the University should consider having a member of the compliance staff travel to select away-from-home men's basketball and baseball games. [NOTE: A member of the athletics compliance staff currently travels to all away-from-home football contests.] The presence of compliance staff will assist with the rules education in this area, as well as relationship building with the baseball, football and men's basketball staffs, student-athletes and boosters.

L. Investigating and Self-Reporting of Rules Violations

The University has established a protocol concerning the investigation and self-reporting of NCAA rules violations, and the protocol meets industry standards. Further, the system for self-reporting and investigating violations appears to be effective, and there is a clear understanding that violations and irregularities must be reported.

The assessment verified that the University:

- | | | |
|--|---|-----------------------------|
| a. Has written policies and procedures for investigating and reporting violations of NCAA (and Conference, if applicable) rules? | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No |
| b. Demonstrates a history of self-reporting Level III and Level IV violations? | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No |
| c. Ensures that appropriate University personnel are copied on all Level III and Level IV violations (e.g., FAR, director of athletics, sport supervisor). | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No |
| d. Safeguards that the University President is provided with regular updates regarding the University's monitoring efforts and self-reports submitted to the NCAA. | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No |

Recommendations: There are no recommendations in this area.

M. Commitment of Personnel to Rules Compliance Activities

There is a demonstrated and extensive commitment to rules compliance present at UL Lafayette.

The assessment evaluated whether the University:

- | | | |
|---|---|-----------------------------|
| a. Has procedures in place both within and outside of the athletics department (e.g., did the Registrar understand his/her role in the NCAA certification process)? Are these procedures being used? | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No |
| b. Demonstrates that during the past year, have all institutional personnel with formal compliance responsibilities received a written notification of their specific oversight responsibilities? | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No |
| c. Provides information on the importance of rules compliance in all of the following: contracts or letters of appointment, performance evaluations, and job descriptions for all administrative staff and coaches associated with athletics? | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No |
| d. Demonstrates that during the past year, have all institutional personnel with formal compliance responsibilities received continuing education to reinforce their understanding of existing NCAA (and Conference, if applicable) rules? | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No |
| e. Actively monitors its athletics compliance systems? Similar to above, this monitoring would include within and outside of the athletics department and within and outside of the institution? | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No |
| f. Develops processes for institutional authority outside the athletics department to periodically review the rules compliance program? | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No |
| g. Documents athletics compliance policies and procedures in writing and make those materials available to staff? | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No |
| h. Maintains supporting documentation to substantiate compliance with policies and procedures? | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No |
| i. Requires that candidates for employment (especially coaching staff members) be asked (or the NCAA enforcement staff contacted) whether they have been involved in past NCAA rules violations? | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No |

-
- j. Formally assigns responsibilities for overseeing all aspects of institutional compliance with NCAA (and Conference, if applicable) rules? **Yes** **No**
-
- k. Has the President (or a designated representative) annually review with all athletics department staff members the rules and regulations of the NCAA as they apply to the administration and conduct of intercollegiate athletics? **Yes** **No**
-
- l. Requires that the director of athletics explicitly stress to all athletics program personnel the necessity to self-report possible NCAA (and Conference, if applicable) rules violations? **Yes** **No**
-
- m. Possesses employment agreements for all athletics program personnel stipulating that the violation of NCAA (and Conference, if applicable) rules is prohibited and may result in disciplinary action up to and including termination of employment? **Yes** **No**
-
- n. Requires that all coaches participate in annual (or more frequent) continuing-education programs regarding NCAA (and Conference, if applicable) rules? **Yes** **No**
-
- o. Reminds head coaches of their responsibility to promote an atmosphere of compliance within their programs and to monitor the activities regarding compliance of all assistant coaches and other administrators involved with the program who report directly or indirectly to the coach? **Yes** **No**
-
- p. Has established clear standards and appropriate disciplinary processes (including grievance procedures) related to the conduct of its student-athletes? **Yes** **No**
-
- q. Possesses disciplinary processes for misconduct by student-athletes outside of athletics competition that are the same (or more stringent) than those in place for the student body in general? **Yes** **No**
-
- r. Explicitly prohibits athletics department staff members from maintaining funds or accounts that are not subject to institutional control and/or review? **Yes** **No**
-
- s. Utilizes any computer software programs (other than the NCAA CA²) to monitor compliance with NCAA legislation? **Yes** **No**
-

Recommendations:

1. Ensure that Rules Compliance Expectations are Clearly Detailed in All Contracts/Letters of Appointment, Job Descriptions and Performance Evaluations.

The institution should review the personnel/human resource files of all individuals inside the department of athletics (coaches and staff) and individuals outside the department of athletics who are involved in athletics compliance activities to ensure that employment contracts/agreements contain a clear stipulation that the violation of NCAA (and Conference, if applicable) rules is prohibited and may result in disciplinary action up to and including termination of employment.

2. Take Steps to Safeguard that Sport-Specific Strength and Conditioning Staff are Part of the Overall Student-Athlete Wellness Program.

UL Lafayette has sport-specific strength and conditioning coaches within its baseball program. While those staff members may be identified as part of the overall strength and conditioning staff, in reality, they report directly to the head baseball coach. The University needs to ensure that such individuals – in baseball, and other sports, if applicable – have an organizational reporting structure through the strength and conditioning area, as well as reporting directly to the head coach. This is to ensure that all activities performed to benefit the overall health and wellness of football and basketball student-athletes (e.g., use of permissible supplements) is monitored collectively by the sports medicine and strength and conditioning staffs.

VI. CONCLUSIONS

This assessment revealed that the athletics compliance systems at UL Lafayette are sound and complete. The overall organization and structure of the athletics compliance program has been established in a manner that sufficiently monitors each respective area evaluated within this Report and the institution displays a high level of commitment to NCAA rules compliance at all levels. The demonstration of UL Lafayette's commitment to enhancing its athletics compliance operation in recent years has been shown by increasing the number of athletics compliance staff, promoting the head athletic compliance official to Deputy Director of Athletics (and naming her as a member of the Director of Athletics' Executive Staff), and establishing institutional policies and procedures designed to share the responsibilities for institutional control and compliance.

Additionally, the University demonstrates a strong "culture of compliance" that is advocated by both the President and Director of Athletics. UL Lafayette has a demonstrated history of being proactive in identifying and responding to compliance issues, and there is exceptional communication regarding rules compliance matters between UL Lafayette athletics department and other units on campus.

The recommendations noted in this Report should be taken into consideration to improve the current systems and to help foster an even greater awareness and understanding regarding the importance of rules compliance at an NCAA FBS Division I institution. While the President and Director of Athletics are ultimately responsible for the operation of the athletics department and compliance with NCAA and Sun Belt rules, it is imperative that each individual continue to

accept and understand his or her role as a shared responsibility to the institution's commitment to rules compliance.

It is recommended that senior-level institutional administrators review this Report and coordinate, support and monitor the activities of institutional personnel who will implement an action plan to address the Report's recommendations. The action plan should specify the timetables and individuals responsible for implementing the strategies, corrective measures, and policies and procedures that relate to the recommendations in this Report.