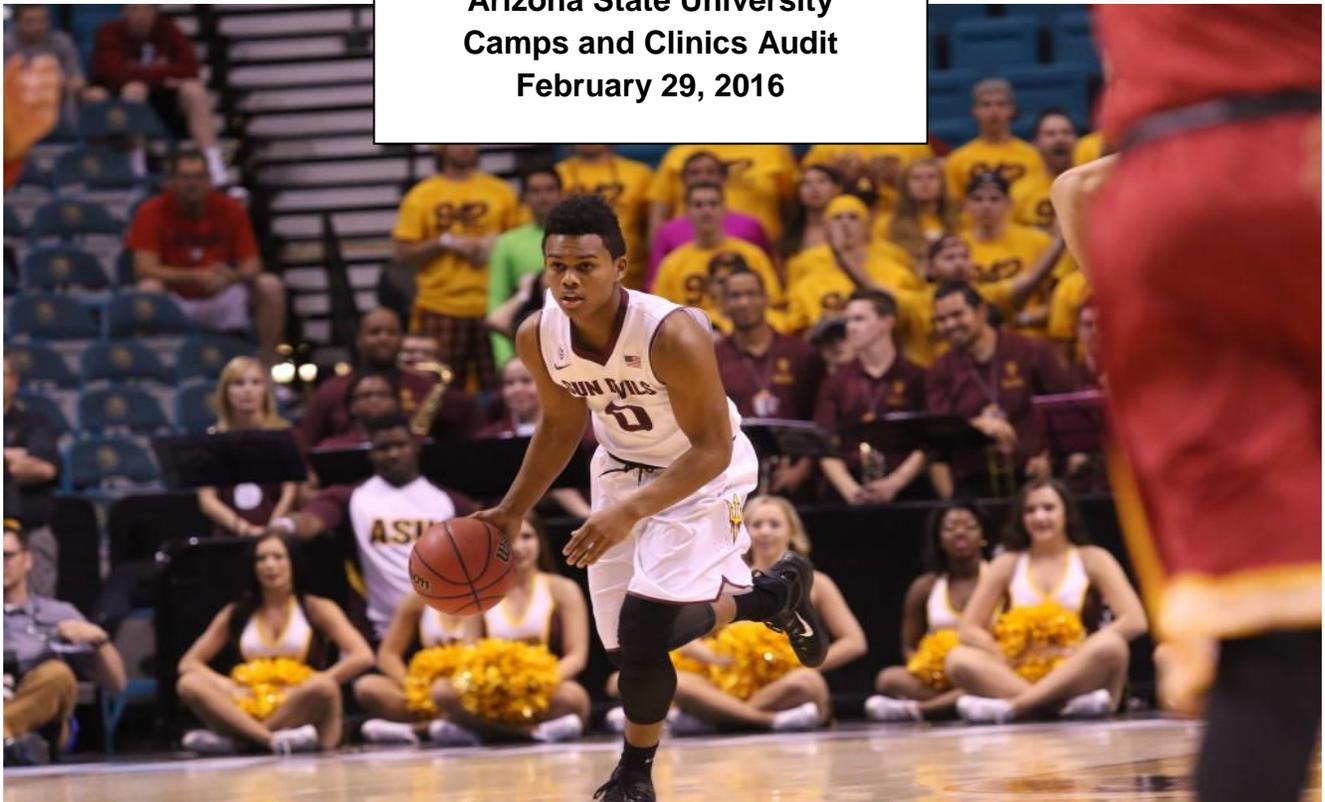


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Summary

The Sun Devil Athletics Camps and Clinics audit was included in the Arizona State University (ASU) annual audit plan for Fiscal Year 2016. This audit is historically completed on a cyclical basis, and is deemed to be of strategic importance given the reputational risk posed to the University for non-compliance with NCAA regulations and bylaws.

Background: Approximately five hundred fifty student-athletes at ASU compete in nine men's programs and fourteen women's programs in one of the most competitive conferences in the country, the Pac-12. Men compete in baseball, basketball, cross country, football, golf, ice hockey, swimming & diving, track & field, and wrestling. Women compete in basketball, beach volleyball, cross country, golf, gymnastics, lacrosse, soccer, softball, swimming & diving, tennis, track & field, triathlon, volleyball, and water polo. The University's Office of Athletics Compliance (Athletics Compliance) is responsible for administering and monitoring sports program compliance with National Collegiate Athletic Association (NCAA) regulations and bylaws. The major institutional risks the University seeks to mitigate include regulatory and reputational risk.

Audit Objectives: The objectives of the engagement were to assess Sun Devil Athletics compliance and individual sports team compliance with applicable NCAA bylaws regarding Camps and Clinics and pertinent Arizona Board of Regents and Arizona State University policies and procedures. Audit also evaluated SDA processes regarding the administration and monitoring of Camps and Clinics' processes in general.

Scope: The scope of this engagement was to review and evaluate the University's compliance with the NCAA rules and bylaws pertaining to Camps and Clinics for the period June 1, 2015, to January 31, 2016. The Camps and Clinics for all twenty-three Sun Devil Athletics-sponsored teams were reviewed at the request of Athletics Compliance, which is responsible for administering and monitoring sports program compliance with NCAA regulations and bylaws.

Methodology: We evaluated supporting documentation provided by Athletics Compliance and Athletic Operations and Facilities for the sports programs under review. We reviewed Camp/Clinic approval forms, advertisement brochures, facility use by SDA staff member – Prior Approval forms, Camp/Clinic Employment forms, Camp/Clinic Student-Athlete Employment forms, Camp/Clinic Student-Athlete Time Sheets (where available), Attendee lists, payment information, and Financial Summaries (where available). We also received Rental Contract/Invoice Checklists and Rental Agreements provided by Athletic Operations and Facilities.

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Athletics Compliance provided a list of camps and clinics held during our audit period, June 1, 2015 through January 31, 2016.

All twenty-three of the ASU sponsored teams were included in the scope of the audit, and 100 percent of the camps and clinics held during the review period were reviewed. The breakdown of the audit sample by sponsored team is as follows:

Sport	Number of Camps and Clinics Held During the review period	Number of Camps and Clinics Reviewed
Women's Sports		
Basketball	3	3
Beach Volleyball	1	1
Cross Country	0	0
Golf	1	1
Gymnastics	1	1
Lacrosse	2	2
Soccer	8	8
Softball	12	12
Swimming & Diving	5	5
Track & Field	0	0
Tennis	0	0
Triathlon	0	0
Volleyball	7	7
Water Polo	0	0
Men's Sports		
Baseball	12	12
Basketball	0	0
Cross Country	0	0
Football	7	7
Golf	1	1
Ice Hockey	1	1
Swimming & Diving	5	5
Track & Field	0	0
Wrestling	3	3
Total	69	69

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Conclusion:

Athletic Compliance

Based on the audit test work performed, we noted no instances of non-compliance with the NCAA bylaws or internal Athletic Compliance procedures.

Athletics Operations and Facilities

Based on the audit test work performed, we noted no instances of non-compliance with the NCAA bylaws, and one area for potential improvement, as follows:

Athletics Operations and Facilities has consistently improved its processes and procedures over the last two Camps and Clinics audits conducted by University Audit in 2009 and 2013. A Rental Contract/Invoice Checklist has been established and utilized, and contracts are consistently signed prior to events. Documentation of procedures to follow for in-house and out-of-house camps and clinics could continue to improve the Facilities rental process.

The control standards we considered during this audit and the status of the related control environment are provided in the following table:

General Control Standard (The bulleted items are internal control objectives that apply to the general control standards, and will differ for each audit.)	Control Environment	Finding No.	Page No.
Reliability and Integrity of Financial and Operational Information	Not Applicable	N/A	N/A
Effectiveness and Efficiency of Operations	Not Applicable	N/A	N/A
Safeguarding of Assets	Not Applicable	N/A	N/A
Compliance with Laws and Regulations			
Athletic Compliance <ul style="list-style-type: none"> Compliance with ABOR and ASU Policies and Procedures 	Reasonable to Strong Controls in Place		
Athletic Operations and Facilities <ul style="list-style-type: none"> Compliance with ABOR and ASU Policies and Procedures 	Reasonable to Strong Controls in Place		

We appreciate the assistance of Athletics Compliance and Athletic Operations and Facilities staff during the audit.

Kim Prendergast

Kim Prendergast, CPA, CFE
Internal Auditor Senior

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Appendix A – NCAA Bylaws Reviewed

The following NCAA Bylaws were selected for inclusion in the SDA – 2015-16 Camps and Clinics audit:

13.12.1.1 Definition. An institution's sports camp or instructional clinic shall be any camp or clinic that is owned or operated by a member institution or an employee of the member institution's athletics department, either on or off its campus, and in which prospective student-athletes participate. (*Adopted: 1/11/89, Revised: 1/10/90, 4/26/01 effective 8/1/01*)

13.12.1.1.1 Definition of Prospective Student-Athlete—Men's Basketball. In men's basketball, for purposes of Bylaw 13.12, the phrase "prospective student-athlete" shall include any individual who has started classes for the seventh grade. (*Adopted: 1/17/09*)

13.12.1.1.1.1 Definition of Recruited Prospective Student-Athlete—Men's Basketball. In men's basketball, for purposes of applying Bylaw 13.12, a recruited prospective student-athlete is a prospective student-athlete who has been recruited pursuant to the definition of recruiting in Bylaw 13.02.13 or the definition of a recruited prospective student-athlete pursuant to Bylaw 13.02.13.1. In addition, a men's basketball prospective student-athlete is considered a recruited prospective student athlete if any of the following conditions have occurred: (*Adopted: 10/29/09*)

- (a) The prospective student-athlete's attendance at any institutional camp or clinic has been solicited by the institution (or a representative of the institution's athletics interests);
- (b) The institution has provided any recruiting materials to the prospective student-athlete;
- (c) An institutional coaching staff member has had any recruiting contact [including in-person or electronic contact (e.g., telephone calls, video conference, electronic correspondence)] with the prospective student-athlete (including contact initiated by the prospective student-athlete);
- (d) The prospective student-athlete has received a verbal offer of athletically related financial aid from the institution; or
- (e) The prospective student-athlete has verbally committed to attend the institution.

13.12.1.1.2 Purposes of Camps or Clinics. An institution's sports camp or clinic shall be one that:

- (a) Places special emphasis on a particular sport or sports and provides specialized instruction or practice and may include competition; (*Adopted: 1/11/89, Revised: 1/10/90, 5/9/06*)
- (b) Involves activities designed to improve overall skills and general knowledge in the sport; or
- (c) Offers a diversified experience without emphasis on instruction, practice or competition in any particular sport.

13.12.1.1.3 Football. [FBS/FCS] In bowl subdivision football, an institution's football camp or clinic may be conducted only during two periods of 15 consecutive days in the months of June and July or any calendar week (Sunday through Saturday) that includes days of those months (e.g., May 28-June 3). The dates of the two 15-day periods must be on file in the office of the athletics director. In championship subdivision football, an institution's camp or clinic may be conducted only during the months of June, July and August or any calendar week (Sunday through Saturday) that includes days of those months (e.g., May 28-June 3). **[D]** (*Revised: 4/28/05 effective 8/1/05, 1/9/06 effective 8/1/06, 1/8/07, 1/16/10, 4/29/10*)

13.12.1.1.4 Basketball. An institution's basketball camp or clinic shall be conducted only during the months of June, July and August, or any calendar week (Sunday through Saturday) that includes days of those months (e.g., May 28-June 3). **[D]** (*Adopted: 1/8/07*)

13.12.1.2 Location Restriction—Basketball and Football. In basketball, an institution's camp or clinic shall be conducted on the institution's campus or within a 100-mile radius of the institution's campus. In football, an institution's camp or clinic shall be conducted on the institution's campus, within the state in which the institution is located or, if outside the state, within a 50-mile radius of the institution's campus. (*Revised: 4/29/10; for men's*)

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basketball camps, a contract signed before 9/17/08 may be honored; for women's basketball camps, a contract signed before 9/16/09 may be honored)

13.12.1.3 Attendance Restriction. A member institution's sports camp or clinic shall be open to any and all entrants (limited only by number, age, grade level and/or gender). (See Bylaw 13.4.3.2.2.) *(Revised: 1/11/89, 1/10/91, 1/11/94, 12/12/06, 9/24/09)*

13.12.1.4 Additional Restrictions—Men's Basketball. In men's basketball, an institution's basketball camp or clinic shall not offer a different participation, registration procedure, fee structure, advertisement and/or logistical experience (e.g., lodging, meals, transportation or awards/mementos) than other institutional men's/boys' basketball camps or clinics. *(Adopted: 8/26/10)*

13.12.1.5 Recruiting Calendar Exceptions. The interaction during sports camps and clinics between prospective student-athletes and those coaches employed by the camp or clinic is not subject to the recruiting calendar restrictions. However, an institutional staff member employed at any camp or clinic (e.g., counselor, director) is prohibited from recruiting any prospective student-athlete during the time period that the camp or clinic is conducted (from the time the prospective student-athlete reports to the camp or clinic until the conclusion of all camp activities). The prohibition against recruiting includes extending written offers of financial aid to any prospective student-athlete during his or her attendance at the camp or clinic (see Bylaw 13.9.2.2), but does not include recruiting conversations between the certifying institution's coach and a participating prospective student-athlete during the institution's camps or clinics. Other coaches wishing to attend the camp as observers must comply with appropriate recruiting contact and evaluation periods. In addition, institutional camps or clinics may not be conducted during a dead period. *(Revised: 4/3/02, 4/26/12)*

13.12.1.6 Advertisements. Restrictions relating to advertisements of an institution's sports camps and clinics in recruiting publications are set forth in Bylaw 13.4.3.2. Such restrictions do not apply to sports camp and clinic advertisements in nonrecruiting publications (e.g., a member institution's game program). **[D]** *(Revised: 8/5/04)*

13.12.1.7 Employment of Prospective Student-Athletes/No Free or Reduced Admission Privileges.

13.12.1.7.1 General Rule. An institution, members of its staff or representatives of its athletics interests shall not employ or give free or reduced admission privileges to a prospective student-athlete who is an athletics award winner or any individual being recruited by the institution per Bylaw 13.02.13.1. An institution may offer discounted admission to its camps and clinics based on objective criteria unrelated to athletics abilities (e.g., registration prior to a specific date, online registration, attendance at multiple sessions, group discounts), provided such discounts are published and available on an equal basis to all who qualify. **[R]** *(Revised: 3/10/04, 4/20/09, 9/24/09)*

13.12.1.7.1.1 Exception—Employment After Commitment. An institution may employ a prospective student-athlete in a camp or clinic, provided he or she has signed a National Letter of Intent or the institution's written offer of admission and/or financial aid or the institution has received his or her financial deposit in response to its offer of admission. Compensation may be paid only for work actually performed and at a rate commensurate with the going rate in the locality for similar services. Such compensation may not include any remuneration for value or utility that the student-athlete may have for the employer because of the publicity, reputation, fame or personal following that he or she has obtained because of athletics ability. A prospective student-athlete who only lectures or demonstrates at a camp/clinic may not receive compensation for his or her appearance at the camp/clinic. *(Adopted: 1/19/13 effective 8/1/13)*

13.12.1.7.2 Payment of Expenses. A representative of an institution's athletics interests may not pay a prospective student-athlete's expenses to attend a member institution's sports camp or clinic. **[R]**

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13.12.1.7.3 Concession Arrangement.

13.12.1.7.3.1 Prospective Student-Athlete. An institution may not permit or arrange for a prospective student-athlete, at the prospective student-athlete's own expense, to operate a concession to sell items related to or associated with the institution's camp. **[R]** *(Revised: 8/5/04)*

13.12.1.7.3.2 Enrolled Student-Athlete. A student-athlete, at the student-athlete's own expense, may not operate a concession to sell items related to or associated with his or her institution's camp to campers or others in attendance because such an arrangement would be considered an extra benefit. However, the institution may employ the student-athlete at a reasonable rate to perform such services for the camp. **[R]** *(Revised: 8/5/04)*

13.12.1.7.4 Awards. Prospective student-athletes may receive awards from a member institution's sports camp or clinic with the understanding that the cost of such awards is included in the admissions fees charged for participants in the camp or clinic. **[R]** *(Adopted: 1/10/92, 8/5/04)*

13.12.1.8 Educational Session. An institution's basketball sports camp or clinic must include an educational session presented in-person or in a video format detailing NCAA initial-eligibility standards and regulations related to gambling, agents and drug use to all camp and/or clinic participants. *(Adopted: 1/14/97, Revised: 1/13/03)*

13.12.2 Employment at Camp or Clinic.

13.12.2.1 Student-Athletes. A student-athlete may be employed in any sports camp or clinic, provided compensation is provided pursuant to the criteria of Bylaw 12.4.1. A student-athlete who only lectures or demonstrates at a camp/clinic may not receive compensation for his or her appearance at the camp/clinic. *(Revised: 4/24/03 effective 8/1/03, 1/19/13 effective 8/1/13)*

13.12.2.1.1 Self-Employment. A student-athlete with remaining eligibility is not permitted to conduct his or her own camp or clinic. **[R]** *(Revised: 4/24/03 effective 8/1/03)*

13.12.2.2 High School, Preparatory School, Two-Year College Coaches or Other Individuals Involved With Prospective Student-Athletes. A member institution (or employees of its athletics department) may employ a high school, preparatory school or two-year college coach or any other individual responsible for teaching or directing an activity in which a prospective student-athlete is involved at its camp or clinic, provided: **[R]** *(Adopted: 1/11/89, Revised: 1/11/94, 6/25/08, 8/12/10)*

(a) The individual receives compensation that is commensurate with the going rate for camp counselors of like teaching ability and camp experience; and

(b) The individual is not paid on the basis of the value he or she may have for the employer because of his or her reputation or contact with prospective student-athletes. (See Bylaw 13.12.3.)

13.12.2.2.1 Prohibited Compensation. A member institution may not compensate or reimburse a high school, preparatory school or two-year college coach, or any other individual responsible for teaching or directing an activity in which a prospective student-athlete is involved based on the number of campers the individual sends to the camp. **[R]** *(Revised: 4/20/11)*

13.12.2.2.2 Employment as a Speaker in an Institutional Camp or Clinic—Basketball. An institution shall not employ (either on a salaried or a volunteer basis) a speaker in any basketball camp or clinic (including a coaches clinic or a camp or clinic involving nonprospects) who is involved in coaching prospective student-athletes or is associated with a prospective student-athlete as a result of the prospective student-athlete's participation in basketball. Such an individual may be employed as a camp counselor (except as prohibited in Bylaw 13.12.2.2.3), but may not perform speaking duties other than those normally associated with camp counselor duties (e.g., skill instruction). *(Adopted: 1/17/09, Revised: 8/26/10)*

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13.12.2.2.3 Individual Associated With a Recruited Prospective Student-Athlete—Men's Basketball.

In men's basketball, an institution or staff member shall not employ (either on a volunteer or paid basis) an individual associated with a recruited prospective student-athlete at the institution's camp or clinic. *(Adopted: 8/26/10)*

13.12.2.3 Athletics Staff Members. A member institution's athletics staff member may be involved in sports camps or clinics unless otherwise prohibited in this section (see Bylaw 11.3.2.6). **[D]** *(Revised: 8/5/04)*

13.12.2.3.1 Camp/Clinic Providing Recruiting or Scouting Service. No athletics department staff member may be employed (either on a salaried or a volunteer basis) in any capacity by a camp or clinic established, sponsored or conducted by an individual or organization that provides recruiting or scouting services concerning prospective student-athletes. In addition, an athletics department staff member may not be employed (either on a salaried or a volunteer basis) in any capacity by a coaches clinic established, sponsored or conducted by an individual or organization that provides recruiting or scouting services concerning prospective student-athletes, even if prospective student-athletes are not involved in the coaches clinic. This provision does not prohibit an athletics department staff member from participating in an officiating camp where participants officiate for, but are not otherwise involved in, a scouting services camp. **[D]** *(Adopted: 1/11/89, Revised: 1/10/90, 1/10/92, 8/5/04, 7/24/14)*

13.12.2.3.2 Institutional/Noninstitutional, Privately Owned Camps/Clinics—Basketball. In basketball, an institution's coach or noncoaching staff member with responsibilities specific to basketball may be employed only at his or her institution's camps or clinics. Participation in such camps or clinics is limited to the months of June, July and August or any calendar week (Sunday through Saturday) that includes days of those months (e.g., May 28-June 3). It is not permissible for a basketball coach or a noncoaching staff member with responsibilities specific to basketball to be employed at other institutional camps or clinics or at noninstitutional privately owned camps or clinics. **[D]** *(Adopted: 4/28/05 effective 4/28/05 for men's basketball, 8/1/05 for women's basketball, Revised: 1/9/06 effective 8/1/06)*

13.12.2.3.3 Noninstitutional, Privately Owned Camps/Clinics—Bowl Subdivision Football.

[FBS] In bowl subdivision football, an institution's coach or noncoaching staff member with responsibilities specific to football may be employed (either on a salaried or volunteer basis) in any capacity (e.g., counselor, guest lecturer, consultant) in a noninstitutional, privately owned camp or clinic at any location, provided the camp or clinic is operated in accordance with restrictions applicable to an institutional camp or clinic (e.g., open to any and all entrants, no free or reduced admission to or employment of athletics award winners). However, employment in such a camp or clinic is limited to two periods of 15 consecutive days in the months of June and July or any calendar week (Sunday through Saturday) that includes days of those months (e.g., May 28-June 3). The dates of the two 15-day periods must be on file in the office of the athletics director. **[D]** *(Adopted: 1/16/10)*

13.12.2.3.4 Noninstitutional, Privately Owned Camps/Clinics—Championship Subdivision

Football. [FCS] In championship subdivision football, an institution's coach or noncoaching staff member with responsibilities specific to football may be employed (either on a salaried or volunteer basis) in any capacity (e.g., counselor, guest lecturer, consultant) in a noninstitutional, privately owned camp or clinic at any location, provided the camp or clinic is operated in accordance with restrictions applicable to an institutional camp or clinic (e.g., open to any and all entrants, no free or reduced admission to or employment of athletics award winners). However, employment in such a camp or clinic may occur only during the months of June, July and August or any calendar week (Sunday through Saturday) that includes days of those months (e.g., May 28-June 3). **[D]** *(Adopted: 1/16/10)*

13.12.2.3.5 Institutional/Noninstitutional, Privately Owned Camps/Clinics—Women's Volleyball.

In women's volleyball, an institution's coach or noncoaching staff member with responsibilities specific to women's volleyball may serve in any capacity (e.g., counselor, guest lecturer, consultant) in a noninstitutional, privately owned camp or clinic, provided the camp or clinic is operated in accordance with

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restrictions applicable to an institutional camp or clinic (e.g., open to any and all entrants, no free or reduced admission to or employment of athletics award winners). However, it is not permissible for a women's volleyball coach or noncoaching staff member with responsibilities specific to women's volleyball to be employed (either on salaried or a volunteer basis) in an institutional camp or clinic or a noninstitutional, privately owned camp or clinic that is conducted off the institution's campus during a quiet period. **[D]** *(Adopted: 1/16/10 effective 8/1/10)*

13.12.2.3.6 Other Noninstitutional Privately Owned Camps/Clinics—Sports Other Than Basketball, Football and Women's Volleyball. In sports other than basketball, football and women's volleyball, an institution's athletics department personnel may serve in any capacity (e.g., counselor, guest lecturer, consultant) in a noninstitutional, privately owned camp or clinic, provided the camp or clinic is operated in accordance with restrictions applicable to institutional camps (e.g., open to any and all entrants, no free or reduced admission to or employment of athletics award winners). Participation in such camps or clinics is not subject to the location restriction in Bylaw 13.12.1.2. **[D]** *(Revised: 8/15/04, 4/28/05 effective 8/1/05, 5/26/06, 1/16/10 effective 8/1/10)*

13.12.2.3.7 Noncoaching Athletics Staff Members With Department-Wide Responsibilities. A noncoaching athletics staff member with department-wide responsibilities may present an educational session at a noninstitutional, privately owned camp/clinic that is not operated under the restrictions applicable to institutional camps/clinics, provided the staff member does not make a recruiting presentation. **[D]** *(Adopted: 4/29/04 effective 8/1/04, Revised: 8/5/04)*

13.12.2.3.8 Noninstitutional Fundamental Skills Camp/Clinic. An institution's athletics department personnel may serve in any capacity at a noninstitutional camp or clinic conducted under the following conditions: **[D]** *(Adopted: 1/13/03, Revised: 8/5/04)*

- (a) The camp or clinic is designed to develop fundamental skills in a sport (rather than refine the abilities of skilled participants in the sport);
- (b) The camp or clinic is open to the general public (except for restrictions in age or number of participants);
- (c) The camp or clinic is conducted primarily for educational purposes and does not include material benefits for the participants (e.g., awards, prizes, merchandise, gifts);
- (d) Participants do not receive a recruiting presentation; and
- (e) All participants reside in the state in which the camp/clinic is located or within 100 miles of the camp/clinic.

13.12.3 Notification of Ineligibility and Consequences of Violation—Men's Basketball. In men's basketball, if a violation specified below occurs, the institution shall declare each involved prospective student-athlete ineligible. Within 30 days of becoming aware of the violation, the institution shall provide written notification to each involved prospective student-athlete that the actions of the institution affected the prospective student-athlete's eligibility. The written notification shall also include an explanation of the consequences of the violation for the prospective student-athlete. *(Adopted: 8/12/10)*

- (a) A violation of Bylaw 13.12.2.2-(b) in which an institution or men's basketball staff member employs (either on a salaried or a volunteer basis) an individual associated with a recruited prospective student-athlete at the institution's camp or clinic.
- (b) A violation of Bylaw 13.12 in which an institutional boys' basketball camp offers a participation registration, procedure, fee structure, advertisement and/or logistical experience (e.g., lodging, meals, transportation or awards/mementos) that differs from other institutional boys' basketball camps.

13.4.3.2 Camp or Clinic Advertisements or Promotions. An institutional camp or clinic advertisement or promotion (e.g., camp brochure, website, newspaper or magazine advertisement) must indicate that the camp or clinic is open to any and all entrants (limited only by number, age, grade level and/or gender). *(Revised: 4/22/14)*

13.4.3.2.1 Camp or Clinic Advertisements in Recruiting Publications. Advertisements for an institution's camp or clinic may be placed in a recruiting publication (other than a high school, two-year college or

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nonscholastic game program), provided the publication includes a camp directory that meets the following requirements: **[D]** (*Revised: 1/11/94, 9/12/03, 9/24/09, 4/22/14*)

(a) The size (not to exceed one-half page) and format of such advertisements must be identical; and

(b) The camp directory must include multiple listings of summer camps on each page (at least two summer-camp advertisements of the same size must appear on each page).

13.4.3.2.2 Advertisements Directed Toward a Particular Audience. An institution may advertise or promote an institutional camp or clinic toward a particular audience (e.g., elite camp), provided the advertisement or promotion indicates that the camp or clinic is open to any and all entrants (limited only by number, age, grade level and/or gender). **[D]** (*Adopted: 9/24/09*)

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Appendix B – NCAA Compliance

2.1 The Principle of Institutional Control and Responsibility. [*]

2.1.1 Responsibility for Control. [*] It is the responsibility of each member institution to control its intercollegiate athletics program in compliance with the rules and regulations of the Association. The institution's president or chancellor is responsible for the administration of all aspects of the athletics program, including approval of the budget and audit of all expenditures. *(Revised: 3/8/06)*

2.1.2 Scope of Responsibility. [*] The institution's responsibility for the conduct of its intercollegiate athletics program includes responsibility for the actions of its staff members and for the actions of any other individual or organization engaged in activities promoting the athletics interests of the institution.

2.8 The Principle of Rules Compliance. [*]

2.8.1 Responsibility of Institution. [*] Each institution shall comply with all applicable rules and regulations of the Association in the conduct of its intercollegiate athletics programs. It shall monitor its programs to assure compliance and to identify and report to the Association instances in which compliance has not been achieved. In any such instance, the institution shall cooperate fully with the Association and shall take appropriate corrective actions. Members of an institution's staff, student-athletes, and other individuals and groups representing the institution's athletics interests shall comply with the applicable Association rules, and the member institution shall be responsible for such compliance.

2.8.2 Responsibility of Association. [*] The Association shall assist the institution in its efforts to achieve full compliance with all rules and regulations and shall afford the institution, its staff and student-athletes fair procedures in the consideration of an identified or alleged failure in compliance.

2.8.3 Penalty for Noncompliance. [*] An institution found to have violated the Association's rules shall be subject to such disciplinary and corrective actions as may be determined by the Association.