



UNIVERSITY OF PENNSYLVANIA

DIVISION OF RECREATION AND ATHLETICS

COMPLIANCE MANUAL

TABLE OF CONTENTS

Table of Contents

I. Introduction 4

II. Overview of the University of Pennsylvania 4

 Penn Athletics Mission Statement..... 5

 Penn Athletics Vision Statement..... 5

 Penn Athletics Core Values 5

III. Institutional Control 5

 Rules Education Opportunities 6

 Monitoring and Auditing System 6

 Rules Violations..... 7

 Head Coach Control 7

 Reporting Outside Income 8

 Local Sports Clubs 8

 Sports Wagering and Gambling 8

 Unethical Conduct..... 9

IV. Recruiting..... 9

 Recruiting Philosophy 9

 General Rule..... 9

 First Opportunity to Visit 10

 Unofficial Visit Procedure 10

 Official Visit Procedure 10

 Recruiting Monitoring..... 12

 Complimentary Admissions for PSAs and Individuals Associated with a Prospect (IAWPs)..... 12

 Donation Requests..... 13

 Camps and Clinics 13

 Recruiting Activities during Camps and Clinics 13

 Social Media: General Guidelines 13

V. Student-Athlete Eligibility 14

 DRIA Procedure for Certifying Student-Athlete Eligibility 14

 Roster Management 15

 NCAA Student-Athlete Assistance Fund 16

VI.	Academic Eligibility Requirements.....	16
	NCAA Eligibility Center	16
	First-Year, Transfer or First-Time Penn Student-Athletes	16
	Academic Policy for Participation in Intercollegiate Athletics	16
	Academic Requirements by Class	17
	Student-Athlete Academic Eligibility Committee	18
	DRIA’s Notification of Transfer Policy	19
VII.	Amateurism.....	19
	Agents	19
	Extra Benefits.....	20
	Student-Athlete Employment	20
	Promotional Activities and Use of a Student-Athlete’s Name, Image, or Likeness.....	21
VIII.	Playing & Practice Season	23
	Playing & Practice Season Limits.....	23
	Seasons of Competition	25
	Participation Waivers.....	25
	Outside (Non-Penn) Teams and Competition.....	25
	Request to Participate in a Summer League.....	26
	Occasional Meals	26
	Compliance Final Thoughts.....	26

I. Introduction

As a member of the National Collegiate Athletic Association and the Ivy League, the University of Pennsylvania is dedicated to compliance with all rules and regulations set forth by those governing organizations. The role of the Compliance Office is to avoid violations of these rules and regulations through the administration of a comprehensive compliance program. When violations do occur, they are dealt with swiftly, and appropriate corrective measures are taken to prevent future violations of this sort.

At the cornerstone of the Compliance Office's efforts is a strong commitment to rules education that targets every individual involved in our athletics programs including prospects, enrolled student-athletes, coaches, athletics staff, university faculty and staff and athletics boosters. The education program is intended to be proactive in nature, delegating compliance responsibilities and maintaining open lines of communication.

The goal of Penn's compliance program is to minimize rules violations, thereby maintaining the integrity of intercollegiate competition and the positive image of the University of Pennsylvania and its athletic programs. Through a commitment to honesty and sportsmanship, the Compliance Office and Penn Athletics seek to maintain intercollegiate athletics as an integral part of the educational program and the athlete as an integral part of the student body.

Penn is committed to maintaining its intercollegiate athletic programs within the principles and standards of the University, the Ivy League and the NCAA. Compliance to rules and regulations is a shared responsibility across departments and schools. As an employee of the Division of Recreation and Intercollegiate Athletics, you assume responsibilities for ensuring Penn's compliance to all rules and regulations pertinent to participation in athletics.

This manual presents a clear and accurate outline of the Division's Compliance Program and its related responsibilities. While we intend to cover most areas, NCAA rules are constantly changing. We encourage all members of the Penn Athletics community to reach out to Penn Compliance if you have any questions.

II. Overview of the University of Pennsylvania

The University of Pennsylvania is committed to the following core values:

INCLUSION:

- **Scholarship and Learning:** Academic life at Penn is unparalleled, with 100 countries and every U.S. state represented in one of the Ivy League's most diverse student bodies.
- **Access and Affordability:** Financial need is not a barrier to a Penn education. We admit undergraduate students without regard to need, and offer "all-grant" financial aid packages, substituting grants for loans.
- **Dynamic and Diverse Community:** Penn is committed to creating a community of students, scholars, and staff that reflects the diversity of the world we live in.

INNOVATION:

- **Integrated Knowledge:** Solving today's complex problems requires knowledge that crosses traditional boundaries.
- **Research Discovery:** Penn is one of the world's most powerful research and teaching institutions, with a research budget last year of nearly \$1 billion and more than 4,000 active faculty members.

IMPACT:

- **Beautiful Urban Campus:** Expansive college greens and recreational spaces. Twelve schools connected on a single campus. Penn's geographical unity is unique among Ivy League schools, fostering our integrated approach to education, scholarship, and research.
- **Community Engagement:** At Penn, civic engagement is an integral part of campus life.

Penn Athletics Mission Statement

Empowering individual excellence and fostering community through varsity, club and recreational athletics.

Penn Athletics Vision Statement

Impact through athletics.

Penn Athletics Core Values

1. Character First
2. Aiming Big
3. Humility
4. Enjoyment
5. Community Matters

III. Institutional Control

It is the responsibility of the Compliance Office to help educate anyone involved in Penn Athletics to help minimize violations of NCAA and conference rules and regulations. At the cornerstone of these efforts is a strong commitment to rules education that

targets every individual associated with Penn athletics programs including prospects, enrolled students, coaches, athletics staff, university faculty and staff, and athletics boosters. The education program is intended to be proactive in nature, creating and maintaining open lines of communication. This encourages individuals to “ask before they act”. The educational endeavors are bolstered through the implementation and administration of extensive documentation and monitoring programs.

Rules Education Opportunities

Education Provided to Enrolled Student-Athletes Include:

- Mandatory beginning of the year meeting with Compliance Office staff to review NCAA, Ivy League, and Penn rules and regulations, eligibility, and extra benefits.
- Completion of Eligibility Forms in TEAMWORKS COMPLIANCE + RECRUITING, which include but are not limited to:
 - Drug Testing Consent Form
 - HIPPA
 - Student-Athlete Statement
 - Employment
 - Institutional and outside aid
 - DRIA Student-Athlete Consent Declarations
 - NCAA Sexual Violence Attestation
- Student-Athlete handbook made available to all student-athletes.
- The Pottruck Center for Student-Athlete Success meets with all teams to discuss Academic Eligibility and resources.
- Student-Athlete Advisory Committee meetings.
- Mandatory end of year meeting for all returning student athletes detailing rules and regulations relevant to the end of the academic year.

Education Provided to Coaches and Athletic Department Staff Includes:

- NCAA and Ivy League Manual issued annually.
- Mandatory Rules Education sessions held every month.
- Recruiting calendars.
- Coaches complete NCAA certification rules education annually.
- Various educational memos, interpretations, announcements from Compliance Office as necessary.
- New coaches, including volunteers, are required to complete new employee orientation session with the Compliance Office.

Compliance Office Procedure for Providing Interpretations

- Question is directed to the Compliance Office via email, over the phone or in-person. Where possible, please send the question in writing.
- If the question is subject to interpretation, the Compliance Office consults the NCAA and/or Ivy League Manual, NCAA Legislative Services Database, Ivy Interpretations Database and peer Compliance Offices.
- If further clarification is necessary, the Compliance Office contacts the Ivy League Compliance Office to discuss the relevant interpretation.
- If the Compliance Office wants to further pursue the issue or needs further clarification, Compliance Office requests the conference office to consult with the NCAA AMA contact for urgent issues; for non-urgent issues, compliance staff will submit an interpretation request through the Requests and Self-Reports Online (RSRO) portal.
- The Compliance Office reports the interpretation back to the staff member in writing or over phone.
- A copy of interpretation is archived in the email files.

Monitoring and Auditing System

Teamworks Compliance + Recruiting software provides state-of-the-art technologies that centralize the entire recruiting, reporting and compliance function for our athletic department. These technologies give the department the power to automatically track all prospect communications (phone, text, email), automatically generate compliance reports, and easily view information that the coaches enter into the program (e.g., CARA logs, official/unofficial visits, contacts/evals, etc.) This ensures adequate monitoring of the process and complete transparency for the athletic department.

Teamworks Compliance + Recruiting allows the compliance office the ability to monitor all communications (phone, email, text) in one platform. The software flags and isolates potential violations into separate reports and allows only the compliance office to make changes or final determinations. Additionally, the software will alert the compliance office whenever potential violations have occurred.

Teamworks Compliance + Recruiting provides the compliance office with a full range of features for managing current student-athletes. This tool allows you to see a full view of the student-athlete's profile, details about their eligibility, and even run reports based on past and current statuses. In addition, the student-athletes can access the system to complete required forms, review practice logs submitted by the coaches, and to input/select guests for complimentary admissions to their contests. Teamworks Compliance + Recruiting also allows all parties to communicate with student-athletes through text messages and e-mails.

Modeled after a major NCAA infractions case around practice monitoring, Teamworks Compliance + Recruiting has created a two-side practice log solution that will not only allow the coaches to submit their countable hours (practice logs), but also allows compliance to monitor those activities in real-time. Coaches submit their activities to an interactive calendar that calculates all of the hours and proactively warns them of violations. Teamworks Compliance + Recruiting provides the compliance office with the ability to monitor all of the submitted activities and can submit them electronically to the student-athletes for their review and approval, as well as maintain archived documentation of all activities and approvals.

At the beginning of the year, every compliance department must go through the forms process with all their student-athletes. Teamworks Compliance + Recruiting allows the compliance office to send all those forms to the student-athletes electronically for them to review, fill out, sign, and submit back to the compliance office.

Rules Violations

At the University of Pennsylvania, all violations – big or small – need to be reported. In responding to rules violations, the University will look at such factors as whether the violation is intentional, whether any competitive advantage is gained, whether a student-athlete's eligibility is affected and/or whether violations are recurring. The University's goal in responding will be to encourage communication, to seek consistency and accountability and, above all, to send a strong message that the University is unequivocally committed to rules compliance.

Procedures for Processing and Self-Reporting Violations and for Investigating Potential Violations

All actual and potential violations of NCAA rules should be reported to a Compliance Office staff as soon as the staff member is made aware of the situation. The Compliance Office will assess if a violation has occurred.

Potential Level III violations will be investigated by the Compliance Office at the discretion of the Director of Athletics before a self-report is submitted to the NCAA via the RSRO portal. If a violation is determined, a notification of a violation will be given to the Sport Administrator and Head Coach. For violations that impact a student-athlete's eligibility, the student-athlete(s) will be declared ineligible, and reinstatement will be requested. For all non-NCAA sports, a Level III violation will be submitted to the Ivy League or applicable sport governing body.

After a preliminary investigation is done by the Compliance Office and a potential or actual violation is believed to be a Level I or II violation, it will be forwarded to the Director of Athletics and University Legal Counsel for further review and institutional control considerations. This group, in conjunction with the President of the University and the conference Commissioner, will discuss how to proceed with the investigation, including the hiring of an outside investigative individual or team.

If a preliminary investigation determines a violation or potential violation to be a Level I or II and/or has institutional control ramifications, all further investigation and interviews will be conducted by either the Faculty Athletics Representative, University Legal Counsel, and/or an outside investigative individual or firm, unless the investigation is a joint effort between the NCAA and institution. In that instance, the Compliance Office may conduct interviews in conjunction with the enforcement staff. The Compliance Office will be involved in coordinating interviews and gathering information for the investigative team and be present during any interviews with student-athletes, coaches, or staff to insure due process and ethical conduct obligations.

Violations involving another member institution will be forwarded to the Director of Athletics (or designee) of that institution for a follow-up investigation and report and vice versa if another institution alleges a violation involving the University of Pennsylvania.

Head Coach Control

An institution's head coach is presumed to be responsible for the actions of all institutional staff members who report, directly or indirectly, to the head coach. An institution's head coach shall promote an atmosphere of compliance within his or her program and shall monitor the activities of all institutional staff members involved with the program who report, directly or indirectly, to the coach.

Contact information to report a violation:

Rachel Kuperinsky: Associate AD, Compliance

- Ext. 3-9697
- rhiller@upenn.edu

Steph Brennan: Director of Compliance

- Ext. 8-6241
- szewe@upenn.edu

Reporting Outside Income

Per NCAA rules, all coaches and staff employed by the University of Pennsylvania Division of Recreation and Intercollegiate Athletics must provide an annual detailed written account of all athletically-related income and benefits from sources outside the institution. The NCAA specifies athletically-related income including, but not limited to, the following:

- Income from annuities
- Sports Camps (Non-Institutional Camps only)
- Housing benefits (including preferential housing arrangements)
- Country Club memberships
- Complimentary Ticket Sales
- Television and radio programs
- Endorsement or consultation contracts with athletic shoe, apparel, or equipment manufacturers**
- Other income or benefits reported for tax purposes***

**Prior to entering into any contract of this type, the contract must be submitted and approved by Penn Athletics.

***Only report any income from non-institutional sources.

All coaches and DRIA staff employed by the University must report this information by January 31 of each calendar year by using the Outside Income Form on Teamworks Compliance + Recruiting.

Local Sports Clubs

In sports other than basketball, a coach employed by the University of Pennsylvania may be involved in any capacity (e.g., as a participant, administrator, or in instructional or coaching activities) in the same sport for a local sports club or organization located in the institution's home community, provided all prospective student-athletes participating in said activities are legal residents of the area (within a 50-mile radius of the instruction).

All coaches employed by the University must submit the Local Sports Club form through Teamworks Compliance + Recruiting on an annual basis.

Sports Wagering and Gambling

Sports Wagering includes placing, accepting, or soliciting a wager (on a staff member's or student-athlete's own behalf or on the behalf of others) of any type with any individual or organization on any intercollegiate, amateur or professional team or contest. Examples of sports wagering include, but are not limited to:

- The use of a bookmaker or parlay card
- Internet sports wagering
- Auctions in which bids are placed on teams, individuals, or contests
- Pools or fantasy leagues in which an entry fee is required

Per NCAA rules, the following individuals shall not knowingly participate in sports wagering activities or provide information to individuals involved in or associated with any type of sports wagering activities concerning intercollegiate, amateur, or professional athletics competition:

- Staff members of an institution's athletics department;
- Non-athletics department staff members who have responsibilities within or over the athletics department (e.g., president, faculty athletics representative);
- Staff members of a conference office; and
- Student-athletes.

The prohibition against sports wagering applies to any institutional practice or any competition (intercollegiate, amateur, or professional) in a sport in which the NCAA conducts championship competition, in bowl subdivision football and in emerging sports for women.

Further, any use of insider information by virtue of one's status within DRIA to wager for or against any Penn Athletics team is strictly forbidden. A violation of the Sports Wagering and Gambling policy could result in termination of employment of a DRIA staff member, loss of eligibility for a student-athlete, and disassociation from the University for a representative of athletics interest.

Unethical Conduct

Unethical conduct by a prospective or enrolled student-athlete or a current or former institutional staff member, which includes any individual who performs work for the institution or the athletics department even if he or she does not receive compensation for such work, may include, but is not limited to:

- Refusal to furnish information relevant to an investigation of a possible violation of an NCAA regulation when requested to do so by the NCAA or the individual's institution;
- Knowing involvement in offering or providing a prospective or an enrolled student-athlete an improper inducement or extra benefit or improper financial aid;
- Knowingly furnishing or knowingly influencing others to furnish the NCAA or the individual's institution false or misleading information concerning an individual's involvement in or knowledge of matters relevant to a possible violation of an NCAA regulation;
- Receipt of benefits by an institutional staff member for facilitating or arranging a meeting between a student-athlete and an agent, financial advisor or a representative of an agent or advisor (e.g., "runner");
- Knowing involvement in providing a banned substance or impermissible supplement to student-athletes, or knowingly providing medications to student-athletes contrary to medical licensure, commonly accepted standards of care in sports medicine practice, or state and federal law;
- Engaging in any athletics competition under an assumed name or with intent to otherwise deceive; or
- Failure to provide complete and accurate information to the NCAA, the NCAA Eligibility Center or the institution's athletic department regarding an individual's amateur status.

IV. Recruiting

One of the major functions of the Compliance Office is to monitor the recruitment of prospective student-athletes by institutional staff members. This is accomplished through educational programs, as summarized in the preceding section, and through a comprehensive monitoring program. The combination of these programs helps to avoid recruiting violations and provides clear and complete documentation of each contact, evaluation, telephone call and correspondence with each prospective student-athlete.

Recruiting Philosophy

The goal of an official or unofficial visit is to introduce the prospective student-athletes to the academic and athletic opportunities that will be made available to them if they decide to choose the University of Pennsylvania. The emphasis will be on our total commitment to their development and have the prospect spend as much time with the staff for them to make an accurate assessment of that commitment.

General Rule

All in-person, on- and off-campus recruiting contacts with a PSA or the PSA's family members shall be made only by authorized institutional staff members. The following are the only exceptions:

- Admissions Program – Off-campus recruiting contacts may be made by an institution's regular admission program representative and directed at all prospective students.
- Coach who is PSA's Family Member – Recruiting contact and evaluation limitations do not apply to a coaching staff member who is a family member of a participant in any activity being observed, provided the attendance by the coaching staff member does not involve any personal contact with any PSA participating in the contest.
- Established Family Friend/Neighbor – Contacts made with a PSA by an established family friend or neighbor, it being understood that such contacts are not made for recruiting purposes and are not initiated by a member of an institution's coaching staff.
- Spouse of a Staff Member –
 - On Campus – Always permissible.

- Off Campus during official visit only.
- Unavoidable Incidental Contact – An unavoidable incidental contact by a representative of the institution’s athletics interests, provided the contact was not prearranged, does not take place at the PSA’s educational institution or site of organized competition and practice, is not made for the purpose of recruitment, and involves only normal civility.
- Former Student-Athlete – On-campus contact between a former student-athlete and a PSA and his/her family is permissible.

First Opportunity to Visit

ALL DATES ARE SUBJECT TO RECRUITING CALENDAR RESTRICTIONS.

Lacrosse, Softball, Baseball:

- A PSA may not be provided an official visit or an unofficial visit before September 1 at the beginning of his or her junior year in high school.

Men’s Basketball:

- In men’s basketball, a PSA may not be provided an expense-paid (official) visit earlier than August 1 of his junior year in high school.
- An unofficial visit may be made on August 1 of the sophomore year.

Women’s Basketball:

- In women’s basketball, a PSA may not be provided an expense-paid (official) visit earlier than January 1 of her junior year in high school.
- An unofficial visit may be made anytime.

Football:

- In football, an institution may provide a PSA an expense-paid visit beginning April 1 of a PSA’s junior year.
- An institution shall not provide a PSA with an official visit in conjunction with the PSA’s participation in an institutional camp or clinic.
- An unofficial visit may be made anytime.

Men’s Rowing:

- Official visits may be made starting on the opening day of classes of the senior year.
- An unofficial visit may be made beginning August 1 of the junior year in high school.

Squash

- Official visits may be made starting January 1 of junior year in high school.
- An unofficial visit may be made beginning September 1 of the junior year.

All other sports

- Official and unofficial visits may begin on August 1 of junior year in high school.

Unofficial Visit Procedure

Due to the NCAA adopting new unofficial visit legislation, we have created a process to better protect your programs. This process applies to ALL SPORTS.

To record an Unofficial Visit, submit the Unofficial Visit Recording Form to Compliance through Teamworks Compliance + Recruiting following the process in the Teamworks Compliance + Recruiting Manual.

As a best practice, submit documentation to Compliance at least two business days prior to the unofficial visit. If the visit is unplanned, please submit documentation immediately following the visit.

Official Visit Procedure

Please refer to the Teamworks Compliance + Recruiting Manual for the Official Visit Procedure.

NOTE: All visits should be submitted to Penn Compliance at least five working days prior to the visit start date. No visit may occur without approval from Penn Compliance.

Reminders about Official Visits:

Length of Visit

- Official visits may not exceed two consecutive nights.
- Extenuating circumstances do apply. Please work with the Compliance Office to determine if such a circumstance applies.
-

Transportation

- Commercial transportation at coach-class airfare must be used.
- No chartered or private planes may be used to transport the PSA or his/her parents or guardians.
- No first-class tickets may be purchased to transport the PSA or his/her parents or guardians.
- Transportation may be provided to the PSA and up to two family members.

Campus Transportation

- The coach is required to use his/her own vehicle or a vehicle approved by Compliance prior to the visit to transport the PSA.
- A student-host is required to use his/her own vehicle or another student-athlete's vehicle to transport the PSA.

Lodging

- Hotel accommodations for official visits of a PSA and their parents/ guardians may be arranged at local hotels (e.g., The Study, Inn at Penn, Sheraton).
- PSAs may also stay on-campus in the student host's dorm room.
- Under NO circumstances may the hotel room be classified as a suite or include special accessories (e.g., Jacuzzi).
- Lodging may be provided to the PSA and up to four family members.

Meals

- The PSA (and any parents/relatives in attendance) may not be taken to any restaurants that are not comparable to the meals provided to student-athletes during the regular academic year.
- A coach should be present at each meal unless the student-host is using the student host entertainment money to purchase the meal.
- No arrangements for admittance to exclusive or elite restaurants, or exclusive tables may be made.
- An itemized receipt must be submitted to the Finance Office. Should any questions arise, the Compliance Office may ask the coaching staff for a list of those who attended the meal, including those who paid for themselves.
- Meals may be provided to the PSA and up to four family members.

Lodging/Meals while in Transit

- Actual costs for meals and lodging may be paid for a PSA and up to two family members while traveling to and from campus for an official visit.

Decorations During Visit

- An institution may decorate common areas in athletics facilities (e.g., lobby, coach's office, suite in arena) for a visit, provided the decorations are not personalized and the common areas are not accessible or visible to the general public while decorate.

Responsibilities of the Student Hosts

- All student-hosts must have sat through an eligibility meeting where education is given about being a Student Host.
- Student-hosts cannot purchase or provide alcohol or drugs for a PSA, even if they are of legal drinking age. This includes taking the PSA to a party where alcohol is present and using the host money for the entry fee.
- Student-hosts cannot consume alcohol or take drugs while performing hosting duties during the official or unofficial visit, even if they are of legal drinking age.
- Student-hosts cannot arrange and/or use host money for sexual encounters or adult entertainment for the PSA.
- Student-hosts may not take the PSA to casinos or participate in any other gambling/gaming activity (e.g., horse racing).
- The PSA and student-hosts shall not participate in any activity that violates criminal law, including but not limited to assault and battery, underage drinking, and contributing to the delinquency of a minor.

Responsibilities of the Prospective Student-Athlete

- The PSA cannot consume alcohol or take non-prescribed, illegal drugs during official/unofficial visits, even if the PSA is of legal drinking age.

- The PSA cannot engage in illicit entertainment (e.g., strip clubs).
- The PSA must sign a statement at the end of the official visit that the visit rules were reviewed at the beginning of the visit and that the PSA didn't violate any of the reviewed rules.

Responsibilities of the Coaches and Administrators

- Coaches must submit the itinerary before and after each visit. Therefore, coaches must ask the student-hosts before the visit what activities are planned for the PSA, and after the visit what activities occurred.
- Coaches must discuss the official visit policy with the PSA and parent/guardian, if applicable, on the first day of the PSA and parent/guardian's arrival on campus.
- Coaches and administrators cannot consume alcohol in the presence of the PSA.

Personalized Items

- No jerseys or uniforms with names are permitted.
- No name plates in locker rooms are permitted.
- No personalized scoreboard recruiting presentations are permitted.
- No game-day simulations are permitted.
- No other type of personalized item or event is allowed.
- A PSA can visit the locker room prior to and after the game and can stand on the sidelines/by the bench during pre-game activities. The PSA must be escorted by a staff member.

Sanctions

- Violations by PSA
 - A violation of the official visit policies by the PSA could result in the University of Pennsylvania ceasing to recruit the PSA.
- Violations by Student-host
 - If student-hosts use host money in a manner inconsistent with the policies, they must repay the host money.
 - Any student-host who violates the policies will not be permitted to be a student-host in the future.
- Penalties on Head Coach
 - Upon the first violation of these rules by a student-host, the head coach will receive a letter of reprimand.
 - After the second violation of these rules by a student-host, there will be a reduction in off-campus recruiting opportunities determined by the Director of Athletics.
- Report to conference office
 - The university will submit an annual report of violations to the conference office.

Recruiting Monitoring

Off-Campus Recruiting Activities

- Coaches are required to sit for the recruiting certification rules education presentation on an annual basis prior to participating in off-campus recruiting activities.
- The education must be completed by August 1.

Contacts and Evaluations

- Coaches must log all contacts and evaluations in Teamworks Compliance + Recruiting each time they are off-campus for recruiting purposes.
- Submission of recruiting logs are due to Penn Compliance on the 1st of every month for review.

Telephone Calls and Electronic Transmissions

- All coaching staff members are required to log all calls in Teamworks Compliance + Recruiting. If they do not use the application to make the phone call to automatically log it, they must go into the software and manually enter the call.
 - Compliance highly encourages using the software to call all PSAs since Teamworks Compliance + Recruiting has a protection feature that reminds coaches/staff of any applicable calling rules before each call.

Complimentary Admissions for PSAs and Individuals Associated with a Prospect (IAWPs)

- Prospective student-athlete complimentary admissions are provided by the Ticket Office to prospective student-athletes on official and unofficial visits upon coach's request to regular season home contests.
- Coach requests complimentary admissions for PSAs through Teamworks Compliance + Recruiting. Audits of the requests will be made at the Compliance Office's request.

- Guests are provided complimentary admission at the event by the Ticket Office after signing Complimentary Admission Pass List.
- Records of all player guest lists are kept on file in the Ticket office.
- High School and Junior College Coach complimentary admissions are provided by Athletic Ticket Office at regular season home events only.
- Pass list is reviewed by Compliance Office upon request.

Donation Requests

Please note that the University of Pennsylvania may not provide any items to events that will directly or indirectly benefit prospect-aged individuals (e.g., 9th-12th grade, 7th - 12th grade for Men's Basketball and Volleyball).

All requests should be made through the Marketing or Ticketing Office and will be approved by Compliance.

Camps and Clinics

All individuals involved in Camps and Clinics at the University of Pennsylvania will be expected to:

- Comply with University of Pennsylvania policies on the use of University resources and comply with all applicable NCAA & Ivy League regulations.
- Comply with the annual Camp Guidelines as issued by the Penn Athletics Business Development Office.
- Submit all required documents and forms by the designated date.
- Submit all promotional material to Penn Compliance prior to publication for approval.

Recruiting Activities during Camps and Clinics

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 offers of admission 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.

- Institutional staff members are prohibited from working exclusively with certain prospects, because selective tutelage would constitute a special arrangement for the prospects.
- It is not permissible to give recruiting presentations during institutional camps or clinics.
- It is permissible to show a video during camp on scoreboards and video boards, provided the video meets the terms of Bylaw 13.4.1.9.
- It is not permissible for an institution to invite members of the media to attend a sports camp or clinic held on an institution's campus. It is also not permissible for an institution to provide members of the media special access (e.g., access to areas of the camp not accessible to the general public) to view or meet with prospective student-athletes in attendance at a camp or clinic.
- Men's and Women's Basketball and Football camps that include prospective student-athletes **MUST** include an educational session detailing NCAA initial eligibility standards and regulations related to gambling, agents, and drug use to all camp participants. This session may be presented in-person or in video format.
- Activities devoted to agility, flexibility, speed, or strength tests (e.g., timing of the 40-yard dash) are only permissible provided the activity is performed in an **instructional** context.

Social Media: General Guidelines

- Prior to a PSA accepting Penn's admissions offer, Penn may not:
 - Comment on social media, directly or indirectly, about a PSA's ability or likelihood of commitment;
 - Publicize a PSA's visit to campus.
- Penn may perform actions that indicate approval of content (like, favorite, retweet, etc.)
- CLICK, DON'T TYPE:
 - You may:
 - Friend/Follow a PSA prior to the mandated date to provide recruiting materials provided the automatically-generated notification is not modified and no additional communication is included.
 - Repost a PSA's post.
 - Endorse a PSA's post (i.e., like or favorite).
 - Direct message a PSA after mandated date.
 - You may not:

- Repost a PSA's post with a comment or response.
 - Comment on a PSA's post (emojis count!).
 - Tag and/or mention a PSA's profile in a post.
- PSAs are permitted to publicize their visits to campus and recruitment by Penn so long as it is not at the direction of the any member of the Penn Athletics staff.
- No interactions with recruiting or scouting services are permissible on social media.

V. Student-Athlete Eligibility

DRIA Procedure for Certifying Student-Athlete Eligibility

The DRIA process and procedures use to determine the eligibility of a continuing, transfer, or first-year student-athlete are described below in the following steps:

1. Preparing the Team Roster
2. Amateurism/Initial Eligibility Certifications
3. Student-Athlete Required Medical Clearance and Eligibility Forms
4. Academic Satisfactory Progress and Good Standing
5. Rules Review and Eligibility Meetings
6. Certification Reports
7. Procedures for Certification of Eligibility
 - a. Practice Certification
 - b. Competition Certification

Preparing the Preliminary Team Roster

At the conclusion of the academic year, coaching staff are required to submit initial team rosters (including team managers) for the upcoming academic year. After receipt of the initial rosters, Compliance will:

1. Move the entire NCAA Compliance Assistant (CAI) roster from the current academic year to the upcoming academic year.
2. Incoming PSAs will have profiles imported from the NCAA Eligibility Center to CAI.
3. Names of student-athlete who have exhausted eligibility and/or graduated are removed.
4. Names of any student-athletes who are not returning to the team (e.g., transferred, quit team, etc.) are removed.
5. Coaches will review the roster for accuracy. Once confirmed, this roster becomes the official team roster.
6. Once confirmed, profiles in Teamworks will be rolled over to the new academic year and profiles will be created for all new student-athletes.
7. The following are requirements to be on the official team roster.
 - a. Appearing on the NCAA Squad list by having a profile on CAI.
 - b. Being coded in the University's Banner system and appearing on the Intercollegiate Athletic Eligibility Report (Compliance codes all official student-athletes).
 - c. Teamworks Access: Only student-athletes on a team roster and coded in Banner will have access to complete required eligibility forms.

Amateurism/Initial Eligibility Certifications

The Compliance Office will update coaches throughout the summer about progress in the NCAA Eligibility Center. Coaches will work with incoming student-athletes to ensure all tasks are completed to reach Final Qualifier status. Once complete, all NCAA Eligibility Center certification data for student-athletes participating in NCAA sports is electronically transferred from the Eligibility Center database into CAI.

Non-NCAA sports will have amateurism and initial eligibility reviewed by the Compliance Office through eligibility forms on Teamworks Compliance + Recruiting. All non-NCAA student-athletes must register for profile accounts in the NCAA Eligibility Center.

Student-Athlete Required Medical Clearance and Eligibility Forms

A student-athlete cannot be certified for practice and/or competition unless all forms are completed on Teamworks Compliance + Recruiting. All forms will be sent out to preliminary rosters with a due date of August 1 (unless otherwise noted). Student-athletes are encouraged to complete their eligibility forms before the deadline.

Student-athletes will also need to be medically cleared by a Penn physician. No student is medically cleared until it is confirmed by the Athletic Trainer and Penn Compliance.

Academic Satisfactory Progress and Good Standing

The Eligibility Report and the Degree Applicable Course Unit Report, both owned and operated by the Office of the Registrar, serve as the primary instruments in evaluating academic progress and good standing. The CSAS staff will review their assigned sports and upload eligibility results to Penn Box. Compliance will review those results and record Academic Eligibility status and percentage of degree data (number of degree applicable course units) in CAI.

Rules Review and Eligibility Meetings

Eligibility meetings are mandated by the NCAA to review eligibility polices, rules, and regulations as well as general pertinent information prior to participation in intercollegiate athletics. Attendance at a meeting is necessary. Failure to attend a meeting will slow down the certification process and will result in a student-athlete having to attend a makeup session.

Certification Reports

Once the previous steps are complete, certification reports will be prepared for review by the Office of the Registrar. After the Registrar has signed off on eligibility, verification by the Sport Administrator and Head Coach is required.

Procedures for Certification of Eligibility

Practice Certification

1. Practice Certification Requirements:
 - a. Admitted through an admission program administered by the Office of Undergraduate Admissions;
 - b. Enrolled for the upcoming term;
 - c. Medical Clearance/Physical administered by Penn;
 - d. Completed NCAA Drug Testing Consent form;
 - e. Completed DRIA Student Acknowledgements form.
2. Certification for practice will be recorded on Teamworks Compliance + Recruiting.

Competition Certification

1. Competition Certification Requirements:
 - a. All other forms completed on Teamworks Compliance + Recruiting;
 - b. Enrolled in a full-time course load;
 - c. Meets progress toward degree and academic good-standing;
 - d. Squad List and Eligibility Checklist have been reviewed and signed by the Registrar, Sport Administrator, and Head Coach.
2. Upon completion of certification, Compliance will update the student-athlete profile on Teamworks Compliance + Recruiting.

Roster Management

ROSTER ADDITIONS:

- Complete Change in Roster – Add to Squad form on Teamworks Compliance + Recruiting.
- The new student-athlete must register with the NCAA Eligibility Center.
 - NCAA sports
 - If a freshman, amateurism, AND academic initial eligibility must be assessed.
 - If a sophomore or older, amateurism initial eligibility must be assessed.
 - Non-NCAA sports must have a profile account.
- Compliance will add the student-athlete to Teamworks Compliance + Recruiting and Compliance Assistant.
- The new student-athlete will receive an e-mail to log on to Teamworks Compliance + Recruiting to complete forms.
- Schedule physical through Athletic Trainer.

NOTE: A student-athlete may not begin practice activities until fully cleared by both Penn Compliance and Athletic Training.

Once fully cleared for practice and competition, Compliance will initiate the Squad List and Eligibility Checklist to be signed by the Institutional Eligibility Officer, the Head Coach, and the Sport Administrator.

ROSTER DELETIONS:

- Complete Change in Roster – Remove to Squad form on Teamworks Compliance + Recruiting.
- Compliance will change the status of the student-athlete:

- Teamworks Compliance + Recruiting – the student-athlete will be changed to inactive and will no longer appear on your roster.
- CA – the student-athlete will be: (a) removed if the season has not yet started; or (b) will be changed and he/she will continue to appear on your squad list if the season has already begun.

NCAA Student-Athlete Assistance Fund

A student-athlete who is a Pell Grant recipient per Penn Student Financial Services is also eligible for certain financial assistance from the NCAA through the Student-Athlete Assistance Fund. All reimbursements must go through the Concur system.

Permissible purchases must fall into the following categories:

- Health and Medical Expenses – prescriptions not paid for by insurance, school insurance that financial aid does not cover, contact lenses or glasses.
- Academic Supplies – up to \$500.
 - Pens, pencils, paper, ink, and other expendable items.
 - The following items are **not eligible** for reimbursement: textbooks, items NOT purchased for educational use (so please explain the educational use if it's not clear, e.g., headphones or batteries).
- Emergency travel home.
- One (1) roundtrip home during the academic year.
- Clothing and Essentials (limited to \$500) – winter jacket, boots, clothes, and other necessities such as shampoo, soap, and detergent.
 - Items **not eligible** for reimbursement include jewelry, perfume, food, beverages, gum, candy, entertainment, and gifts.
 - Freshman and sophomores – You may submit for reimbursement for your laptop up to \$500 immediately or you may wait until the end of the academic year to get a full reimbursement, subject to available funds to cover the whole cost of the laptop.

If a student-athlete at any point loses their Pell Grant or leaves a team, they will no longer be eligible for this program.

Please send all student-athletes to Penn Compliance if they have any questions about the Student-Athlete Assistance Fund.

VI. Academic Eligibility Requirements

NCAA Eligibility Center

All first-time Penn student-athletes must register for the NCAA Eligibility Center. Initial eligibility is reviewed by the NCAA for NCAA sponsored sports. If you are a participant in a non-NCAA championship sport (Sprint Football, Squash, Heavyweight Crew or Lightweight Crew), your certification of these requirements is conducted by Penn Compliance.

First-Year, Transfer or First-Time Penn Student-Athletes

Certification of NCAA initial eligibility or amateurism requirements for student-athletes participating in NCAA Championship-sponsored sports can only be made by the NCAA Eligibility Center. If you are an incoming first-year or transfer student, or a current Penn student participating in intercollegiate athletics for the first time, you must register with the NCAA Eligibility Center.

- **If you are a first-year college student**, NCAA regulations require that you be certified as having satisfied NCAA initial eligibility (academic) and amateurism requirements.
- **If you are a transfer student from a non-NCAA Division I or II school**, NCAA regulations require that you be certified as having satisfied NCAA initial eligibility.
- **If you are a transfer student from an NCAA Division I or II school**, NCAA regulations require that you be certified as having satisfied NCAA amateurism requirements.
- **If you are a Penn student who will be participating in Penn Athletics for the first time**, NCAA regulations require that you be certified as having satisfied NCAA amateurism requirements.
- First-year student-athletes may practice for a maximum of 45 days without the certification being completed.
- All non-NCAA student-athletes must register for an NCAA profile account. Initial eligibility will be assessed by Penn Compliance.

Academic Policy for Participation in Intercollegiate Athletics

To be certified as academically eligible to participate in intercollegiate athletics at the University of Pennsylvania, a student:

- Shall be full-time degree seeking undergraduate student;
- Shall declare a major/concentration by the beginning of the fifth term of full-time enrollment (at Penn or anywhere); and
- Shall satisfy all applicable academic progress requirements, including, but not limited to, progress toward degree and GPA minimums.

Please note, LPS students are not eligible to be Penn Student-Athletes. For more information, review the Admission Policy in this handbook.

PROVISIONAL ELIGIBILITY

Provisional eligibility may be granted one time in a student-athlete's career at Penn when he/she does not satisfy the prescribed norms for progress. If granted, the provisional eligibility will expire at the end of two consecutive terms of enrollment.

To be considered for provisional eligibility a student-athlete shall meet with the school eligibility officer to discuss the academic deficiency and to develop an Academic Enhancement Plan (AEP) which shall record the plan for academic improvement and agreed-upon conditions of provisional eligibility between the student-athlete and the school. The student-athlete shall then review the AEP with the Assistant Director of Athletics for Academic Services who may add additional stipulations. Following these two meetings, the student-athlete shall acquire signatures (in sequence) endorsing the AEP from the sport's head coach and the Assistant Director of Athletics for Compliance.

Academic Requirements by Class

FRESHMAN REQUIREMENTS:

- Full-time college enrollment (3 CUs)
- Satisfied NCAA Eligibility Center requirements for Final Qualifier status (NCAA sports only)
- Satisfied 1.5 CUs in the fall semester for recertification in the spring.

SOPHOMORE REQUIREMENTS:

- Full-time college enrollment (3 CUs)
- Minimum GPA of 2.00
- Satisfied 1.5 CUs in previous spring for fall certification and again in the fall for recertification in the spring.
- Satisfied 4.5 CUs in the previous two academic semesters.
- Satisfied a minimum of 8 CUs in previous academic year (fall + spring + summer terms)

New transfer students (matriculating at Penn for first time), to be academically eligible you must:

- Be a full-time student, and
- Have been awarded 24 credit hours of course work (equivalent of 6 Penn CUs) at your former school.

Provisional Eligibility – After two full-time semesters.

If by the beginning of the third full-time semester a student-athlete satisfies all of the above requirements except for the cumulative GPA of at least 2.00 and/or eight (8) awarded course units on the transcript, the student-athlete may be considered for provisional eligibility.

- Minimum cumulative GPA for provisional eligibility consideration is 1.85.
- Minimum total number of awarded course unit credit is 6 CUs.

JUNIOR REQUIREMENTS:

- Full-time college enrollment (3 CUs)
- Be in a degree program or have an approved major and satisfied 40% of that degree.
- Minimum GPA of 2.00
- Satisfied 1.5 degree applicable CUs in previous spring for fall certification and again in the fall for recertification in the spring.
- Satisfied 4.5 CUs in the previous two academic semesters.
- Satisfied a minimum of 16 CUs in previous two academic years (fall + spring + summer)

Provisional Eligibility – After four full-time semesters.

If by the beginning of the fifth full-time semester a student-athlete satisfies all of the above requirements except for the cumulative GPA of at least 2.00 and/or sixteen (16) awarded course units on transcript, the student-athlete may be considered for provisional eligibility.

- Minimum cumulative GPA for provisional eligibility consideration is 1.90.
- Minimum total number of awarded course unit credit is 14 CUs.

SENIOR REQUIREMENTS

- Full-time college enrollment (3 CUs), unless you satisfy the criteria for an exception under NCAA rules.
- Satisfied 60% of the declared degree.
- Minimum GPA of 2.00
- Satisfied 1.5 degree applicable CUs in previous spring for fall certification and again in the fall for recertification in the spring.
- Satisfied 4.5 CUs in the previous two academic semesters.
- Satisfied a minimum of 24 CUs in previous three academic years (fall + spring + summer)

Provisional Eligibility – After six full-time semesters.

If by the beginning of the seventh full-time semester a student-athlete satisfies all of the above requirements except for having the twenty-four (24) course units awarded, the student-athlete may be considered for provisional eligibility provided a graduation audit has been completed.

- Minimum cumulative GPA for provisional eligibility consideration is 2.00.
- Minimum total number of awarded course unit credit is 22 CUs.

FIFTH YEAR REQUIREMENTS

- Full-time college enrollment (3 CUs), unless you satisfy the criteria for an exception under NCAA rules.
- Satisfied 80% of the declared degree.
- Minimum GPA of 2.00
- Satisfied 1.5 degree applicable CUs in previous spring for fall certification and again in the fall for recertification in the spring.
- Satisfied 4.5 CUs in the previous two academic semesters.
- Satisfied a minimum of 32 CUs in previous four academic years (fall + spring + summer)

Provisional Eligibility –After eight full-time semesters.

If by the beginning of the ninth full-time semester a student-athlete satisfies all of the above requirements except for having thirty-two (32) course units awarded, the student-athlete may be considered for provisional eligibility provided a graduation audit has been completed.

- Minimum cumulative GPA for provisional eligibility consideration is 2.00.
- Minimum total number of awarded course unit credit is 30 CUs.

NULLIFICATION OF AN ACADEMIC ENHANCEMENT PLAN

If you are deficient in course units for any reason that can be resolved (e.g., incomplete grade, professor is tardy in posting grades), your AEP will be voided at the conclusion of the academic year when the deficiency is eliminated within the time period agreed upon in your AEP. It is the responsibility of the student-athlete to notify his or her school eligibility officer when the deficiency is resolved.

Student-Athlete Academic Eligibility Committee

The charge of the Student-Athlete Academic Eligibility Committee is to advise the faculty on University policy and make recommendations for requirements pertaining to participation in intercollegiate athletics. It is also the charge of the committee to review the academic performance of student-athletes and to render eligibility decisions. This committee is chaired by the Institutional Eligibility Officer and the Faculty Athletic Representative and comprises assistant deans and academic advisors representing the undergraduate divisions of the College of Arts and Sciences (CAS), the School of Engineering and Applied Science (SEAS), the Nursing School (NUR) and the Wharton School (WH). The Assistant Athletics Directors for the Center of Student Athlete Success and Compliance serve as staff assistants to the committee.

The committee meets quarterly to discuss issues pertinent to student-athlete eligibility, evaluate appeals and requests for waivers and exceptions, and to review current standing of those student-athletes participating under the provisional eligibility guidelines.

Committee on Student-Athlete Academic Eligibility
Department of Intercollegiate Athletics Staff Assistants

Rachel Kuperinsky
215/573-9697
Associate Director of Athletics/
Compliance
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DRIA's Notification of Transfer Policy

Penn student-athletes who wish to transfer and/or discuss the possibility of transferring with other institutions must email athletic compliance stating his/her intent to transfer and request his/her name to be uploaded in the NCAA transfer portal. Student-athletes may not contact coaches from other institutions, directly or indirectly, without obtaining authorization from Penn Athletics (i.e. – the compliance office adding his/her name into the NCAA transfer portal).

Penn Athletics' policy for transfers is as follows:

- The student-athlete must submit the Notification of Transfer form on Teamworks Compliance + Recruiting to the Compliance Office to initiate the intent to transfer.
- Per NCAA regulations, the institution has two business days to add a student-athlete's name to the NCAA transfer portal. The student-athlete will receive written notification that his/her name has been uploaded to the NCAA portal and is free to discuss transferring with coaches from other institutions.
- Upon receiving notification of a student-athlete's intent to transfer, the athletic department reserves the right to terminate a student-athlete's access to varsity-only designated spaces and educational opportunities, including, but not limited to the Weiss weight room, athletic training room, varsity locker rooms, academic tutors, and programming through our CSAS office.

In the event the student-athlete would like to terminate his/her placement on the Transfer Portal, the request must be made in writing to the Compliance Office.

VII. Amateurism

To prevent amateurism and extra benefit NCAA violations, the compliance staff monitors the interaction of agents and student-athletes, student-athlete employment, and promotional activities involving Penn student-athletes.

Agents

The NCAA supports the Uniform Athlete Agents Act (UAAA) and its adoption in every state. There can be significant damage resulting from the impermissible practices of some athlete agents. Violations of NCAA agent legislation impact the eligibility of student-athletes for further participation in NCAA competition. Violations also may result in harsh penalties on the team and the university, including forfeiture of contests and fines. The UAAA is an important tool in regulating the activities of athlete agents and protecting NCAA student-athletes and member institutions.

If a student-athlete has eligibility remaining and a student-athlete or his/her parents/legal guardians involve themselves with an agent, a student-athlete may put his/her continued eligibility at risk. For the most up-to-date information on rules pertinent to intercollegiate athletics and seeking a career in professional athletics, visit www.ncaa.org/enforcement/agents-and-amateurism.

An individual loses amateur status and becomes automatically ineligible for competition in a particular sport if the individual:

- Uses his or her athletic skill (directly or indirectly) for pay in any form in that sport (unless expressly permitted under NCAA or Ivy League rules);
- Accepts a promise of pay even if such pay is to be received following completion of intercollegiate athletics participation;
- Signs a contract or commitment of any kind to play professional athletics, regardless of its legal enforceability or any consideration received;
- Receives, directly or indirectly, a salary, reimbursement of expenses, or any other form of financial assistance from a professional sports organization based upon athletics skill or participation, except as permitted by NCAA rules and regulations;
- Competes on any professional athletics team even if no pay or remuneration for expenses was received;

- Subsequent to initial full-time collegiate enrollment, enters a professional draft; or
- Enters into an agreement with an agent.

NEGOTIATIONS:

An individual may request information about professional market value without affecting his or her amateur status. Further, the individual, his or her legal guardians, or the institution's professional sports counseling panel may enter into negotiations with a professional sports organization without the loss of the individual's amateur status. An individual who retains an agent shall lose amateur status.

NON-BINDING AGREEMENT:

An individual who signs a contract or commitment that does not become binding until the professional organization's representative or agent also signs the document is ineligible, even if the contract remains unsigned by the other parties until after the student-athlete's eligibility is exhausted.

GENERAL RULE ON AGENTS:

An individual shall be ineligible for participation in an intercollegiate sport if he or she ever has agreed (orally or in writing) to be represented by an agent now or in the future for the purpose of marketing his or her athletic ability or reputation in that sport. Further, an agency contract not specifically limited in writing to a sport or particular sports shall be deemed applicable to all sports, and the individual shall be ineligible to participate in any sport.

BENEFITS FROM PROSPECTIVE AGENTS:

An individual shall be ineligible if he or she (or his or her relatives or friends) accepts any form of benefit from:

- Any person who represents any individual in the marketing of his or her athletics ability. The receipt of such expenses constitutes compensation based on athletic skill and is an extra benefit not available to the student body in general; or
- An agent, even if the agent has indicated that he or she has no interest in representing the student-athlete in the marketing of his or her athletic ability or reputation and does not represent individuals in the student-athlete's sport.

LEGAL COUNSEL:

Securing advice from a lawyer concerning a proposed professional sports contract shall not be considered contracting for representation by an agent under this rule, unless the lawyer also represents the individual in negotiations for such a contract.

Extra Benefits

An extra benefit is any special arrangement by an institutional employee or a representative of Penn's athletics interests to provide a student-athlete or the student-athlete's relative or friend a benefit not expressly authorized by NCAA legislation. Receipt of a benefit by student-athletes or their relatives or friends is not a violation of NCAA legislation if it is demonstrated that the same benefit is generally available to Penn students or their relatives or friends or to a particular segment of the student body (e.g., foreign students, minority students) determined on a basis unrelated to athletics ability.

Below are "Extra Benefits" not permissible under NCAA rules. Please remember these are only examples and this list is not exhaustive:

- A special discount, payment arrangement or credit on a purchase (e.g., airline ticket, clothing) or a service (e.g., dry cleaning, laundry);
- A professional service without charge or at a reduced cost;
- The use of a telephone or credit card for personal reasons without charge or at a reduced rate;
- Services (e.g., movies tickets, dinners, use of car) from commercial agencies (e.g., movie theaters, restaurants, car dealers) without charge or at reduced rates;
- Free or reduced-cost admission to professional athletic contests;
- A loan of money;
- A guarantee of bond;
- The use of an automobile;
- Signing or co-signing a note with an outside agency to arrange a loan;
- Preferential treatment, benefits, or services (e.g., loans on a deferred payback basis) for your athletic reputation or skill or payback potential as a future professional athlete.

Student-Athlete Employment

It is permissible for student-athletes to be employed, provided the job has the following characteristics:

- Job must be real.
- Your hiring must comply with normal hiring practices of the employer.
- Your compensation must be the same as that of others in the same position.

- Your compensation must be unrelated to your athletics reputation or value.
- Your compensation must be actual work done.

EMPLOYMENT MONITORING FORMS

In an effort to alleviate misunderstandings of NCAA legislation surrounding employment by student-athletes, all student-athletes are required to complete an employment monitoring form (history of employment for prior year) as a condition of eligibility in TEAMWORKS COMPLIANCE + RECRUITING.

Promotional Activities and Use of a Student-Athlete’s Name, Image, or Likeness

Effective July 1, 2021, University of Pennsylvania student-athletes may begin to receive compensation from third parties (but NOT from the institution) for use of their Name, Image, and Likeness in endorsements or business activities. **Please refer to the Penn Name, Image, Likeness Policy for the full policy and list of definitions.**

COMPENSATION FOR SERVICES: A student-athlete may receive compensation from a third party (but not from the student-athlete’s institution) for NIL Activity as long as such compensation is provided in exchange for services, activities, intellectual property, appearances, or other value actually provided by the student-athlete and is NOT provided in exchange for athletic performance. Compensation that does not meet this requirement, or is provided in exchange for athletic performance, could be deemed “pay for play” and may lead to a determination of ineligibility to participate in college athletics.

Examples of Impermissible Compensation:

- a) \$100 payment to a soccer student-athlete for each goal scored.
- b) \$10,000 payment to a basketball student-athlete for Player of the Year award.
- c) Free use of a car by a car dealer for a student-athlete when the student-athlete does not provide anything to the car dealer in exchange.

DISCLOSURE: Student-athletes must disclose any NIL Activity to Penn Athletics through the Teamworks Influencer platform that results in compensation within seven days of either the receipt of the compensation or the execution of an agreement for future compensation, whichever occurs first. Absent disclosure, Penn Athletics is unable to assist a student-athlete with eligibility implications that may result from violation of current or future NCAA rules, state, or federal law.

*Any changes to a disclosure must be made within **fourteen days** of the change through Teamworks Influencer as defined by Pennsylvania state law.*

INSTITUTIONAL ROLE:

The University, including its employees, contractors, representatives and agents, MAY:

- Educate student-athletes on NIL, including but not limited to topics intended to educate student-athletes regarding:
 - rules and risks,
 - best practices,
 - how to engage in NIL, and
 - how to build one’s personal brand.
- Assist student-athletes with evaluation of a professional service provider to support NIL Activity.
- Provide student-athletes with a license to use digital content created by the institution or one of its vendors (e.g., photos and videos), whether owned by the university or a third-party contractor, only for activities for which the student-athlete is **not** directly compensated.
 - Note that ownership of such content shared with student-athletes remains with the University or any other owner, and not with the student-athlete.
- Allow student-athletes to access and use institutional facilities for NIL Activity under the same rules, regulations, and fees in effect for any third-party user requesting.
- Provide support to student-athletes that would be provided to any other University student.

The University, including its employees, contractors, representatives and agents, MAY NOT:

- Be involved in the development, operation, or promotion of a noninstitutional NIL Activity.
- Purchase a student-athlete’s work product or service (except that a product or service developed as part of a student-athlete’s coursework is not subject to this restriction).
- Use the promise of any NIL Activity as an inducement to attend the institution.
- Contract with or otherwise knowingly allow any institutional partner or contractor to engage in activity that is impermissible for the institution.

- Pay for, provide, or facilitate a relationship between a professional service provider and any student-athlete.

PROFESSIONAL SERVICE PROVIDERS: Student-athletes may utilize the services of any professional services provider for assistance with NIL Activity. **However, an individual or entity who serves as a student-athlete’s professional service provider for NIL Activity may not also serve as the student-athlete’s agent as defined herein.** Student-athlete use of agents must be consistent with current NCAA rules governing “agents.”

USE OF INSTITUTIONAL NAME OR MARKS: Student-athletes at the University may state that they play “[insert name of sport] at Penn” or that they are “a member of the [insert name of sport] at Penn” to identify themselves in connection with NIL Activity. Student-athletes **may not** use the University’s name in any other manner or any other logo, marks, or other intellectual property owned by the University in connection with noninstitutional NIL Activity.

CONFLICT WITH INSTITUTIONAL CONTRACTS: Student-athletes at the University may enter endorsements or business activities with sponsors of the University or entities that compete with sponsors of the University with the exception of the category of footwear and apparel.

Specifically, the University’s student-athletes are required to wear Nike footwear and apparel while training or competing on behalf of the University, unless Nike has provided a team exemption due to lack of product or an individual exemption for medical reasons.

CONFLICT WITH NCAA OR INSTITUTIONAL VALUES: Student-athletes may not endorse or enter into business activities in categories that conflict with NCAA legislation or Pennsylvania state law.

These areas include:

- Adult entertainment products and services;
- Alcohol products;
- Casinos and gambling, including sports betting, the lottery and betting in connection with video games, online games, and mobile devices;
- Tobacco and electronic smoking products and devices;
- Prescription pharmaceuticals;
- A controlled dangerous substance or any other drug category; and
- Firearms.

The University maintains the right to expand on this list in the future should new areas of conflict arise.

CONFLICT OF COMMITMENT: Student-athletes may not miss class or other mandatory academic requirements or required team activities to engage in NIL activities.

RECRUITING INDUCEMENT AND BOOSTERS: Neither an institution nor a representative of athletics interests, often known as “boosters,” can use NIL Activity or a promise related thereto in any manner that could be deemed an inducement for a prospective student-athlete to attend the University, or for a current student-athlete to remain enrolled at the University.

PROSPECTIVE STUDENT-ATHLETES: Prospective student-athletes may not engage in any NIL Activity that is impermissible for current student-athletes at the University under this policy. Prospective student-athletes do not need to disclose NIL transactions that will not continue during such student-athletes’ enrollment at the University to the University.

INTERNATIONAL STUDENT-ATHLETES: International student-athletes may be limited in their ability to receive NIL compensation from a third party by the terms of their visa or other immigration status. Please contact the Office of International Students and Scholar Services for additional information to ensure that you do not jeopardize your status as a student in the United States.

INSTITUTIONAL PROMOTIONAL ACTIVITIES: Student-athletes may be asked to participate in institutional promotional activities such as appearances, autograph signings, digital content creation, photo shoots, and similar activities in accordance with existing NCAA rules, but may not be paid by the University to participate in any such activity. Student-athletes may opt out of any such activity by notifying their head coach or Penn Compliance.

EQUITY: The University and Athletics are committed to equity in the provision of all permissible institutional services under this policy. Student-athletes are entitled to compensation only from noninstitutional entities and not from the institution; University is not responsible for monitoring, overseeing or enforcing equity in opportunities, compensation or other consideration provided by noninstitutional entities.

EMPLOYMENT STATUS: Although University student-athletes may be employed by the University in a job on campus, student-athletes are not considered employees of the University under any federal, state, or local law, regulation, or ordinance based on their status as student-athletes, regardless of whether the student-athlete receives athletics financial aid, signs a National Letter of Intent, or signs a scholarship agreement with the University. A student-athlete's receipt of NIL compensation from a noninstitutional entity does not alter the non-employee status of the student-athlete as set forth herein.

WITHHOLDING, TAX & OTHER OBLIGATIONS: Student-athletes are responsible for all tax, withholding, reporting, licenses, permissions, permits, expenses, fees and any other obligations, liabilities or costs associated with NIL Activity.

ROYALTY PAYMENT: A person that produces a college team jersey, a college team video game or college team trading cards for the purpose of making a profit shall make a royalty payment to each college student-athlete whose name, image, likeness or other individual identifiable feature is used. The University is not liable or otherwise responsible to any student-athlete for such royalty payments.

DISCLAIMER: The University is not liable or otherwise responsible to any student-athlete, noninstitutional entity that partners with a student-athlete, professional service provider or other entity involved with NIL Activity.

CONSEQUENCES:

The NCAA currently lacks clarity regarding NCAA consequences for violations of this policy. Notably, we expect that student-athletes may be subject to NCAA sanctions up to and including permanent ineligibility to participate in college athletics, for violations of this policy. In addition, student-athletes may be subject to institutional sanctions if they are deemed ineligible. In order to avoid such consequences, NIL disclosures should be made in accordance with this policy.

STUDENT-ATHLETES INVOLVED IN STUDENT ORGANIZED ACTIVITIES

You may participate in student organized activities that involve modeling provided your athletics reputation or ability is not considered in any manner in your selection for the activity and **you have obtained authorization through Penn Compliance.** Therefore, it would not be an infraction of NCAA legislation for you to be a member of a student performing arts group or other student group or event such as a student-run fashion show provided your name, likeness and image are not to be used in a matter impermissible under NCAA legislation. Any monies generated from the activity or event as well as photographs or merchandise produced in conjunction with the activity or event must be compliant with NCAA regulations. The student group's president (or administrative head) must also agree that your name, likeness and image are not being used in a matter impermissible under NCAA legislation.

To safeguard eligibility, all student-athletes should review participation in non-Penn athletics activities with a member of the Penn Compliance staff.

VIII. Playing & Practice Season

Playing & Practice Season Limits

The NCAA and Ivy League rules provide limitations for how much a student-athlete should be participating in countable athletically related activity (CARA). Those rules are:

IN-SEASON:

- Maximum of 4 hours per day.
- Maximum of 20 hours per week.
- Competition counts as 3 hours.
- 1 mandatory day off.
 - This day may not be included in the Ivy Rest Period.
- Upon return to campus from an away-from-home competition, Ivy League teams are required to have 10 hours during which there will be no CARA.
- NOTE: Multi-sport athletes are limited to individual sport limits, i.e., 4 hours per day and 20 hours per week.
- NOTE: There are sport-specific guidelines for the non-championship segment for TEAM SPORTS. Please consult with Penn Compliance or the Ivy League manual for these specific rules.
- At the end of the championship season, teams are required to have 14 consecutive days off (free from any and all CARA), which may be included in the rest period if classes are in session (see below for more information on the Ivy Rest Period).

OUT-OF-SEASON

- Maximum of six hours per week, of which not more than 4 hours may be dedicated to skill instruction.
- 2 mandatory days off.
 - These may be included in the Ivy Rest Period.
- All CARA is prohibited one week prior to the beginning of final exams through the conclusion of each student-athlete's exam period.
- Under Ivy League rules, all CARA is VOLUNTARY.
 - The student-athlete must not be required to report back to their coach or any other athletics department staff member (i.e., strength coach, trainer, manager).
 - A student-athlete may not be subject to penalty if he or she elects not to participate in the voluntary activity.

Examples of CARA that must be counted against the daily and weekly time limitations (this list is not exhaustive):

- Practice – any meeting, activity, or instruction involving sports-related information and having an athletic purpose, held for one or more student-athletes at the direction of or supervised by any member of Penn's coaching staff.
- Competition.
- Required weight training and conditioning activities held at the direction of, or supervised by, any member of Penn's coaching staff.
- Participation in a physical-fitness class.
- Film review that is required, supervised, or monitored by an institutional staff member.
- Required participating in camps, clinics, or workshops.
- Meetings initiated by coaches or other institutional staff members on athletically-related matters.

CARA logs are due to the Compliance Office on a weekly basis on the Monday following the completion of each week through Teamworks Compliance + Recruiting.

IVY LEAGUE REST PERIOD

The Ivy League Rest Period is the 49 days within the academic year designated as rest days. An Ivy Rest Day is a day on which a student-athlete shall have no athletically-related activity commitments and no interaction with the coaching staff for athletically-related purposes. This includes:

- No required activity;
- No voluntary activity under the supervision of a team-coach;
- No team athletic activities (e.g., captain's practices); and
- No team or team member athletically related activities resulting from encouragement by the coaching staff to engage in such activities.

Student-athletes will be free to participate in any recreational venue or activity open to all other students. Sport-specific facilities and equipment normally open only to team members or permitted to be used only under the supervision of the coaching staff for safety reasons (e.g., gymnastics venue, rowing tanks) may NOT be used on an Ivy Rest Day. The varsity weight room may be used with no advanced scheduling or team-coach supervision. Strength and conditioning coaches who perform such duties may be present to supervise but may not conduct workouts.

INTERCOLLEGIATE COMPETITION:

By August 1 of each academic year, finalized competition schedules should be sent to Compliance for verification of NCAA and Ivy League numerical limits. Once verified, the schedule will be sent to the Sport Administrator for budgetary approval.

Once schedules have been input onto Teamworks Compliance + Recruiting, it is the responsibility of the coaching staff to confirm both the playing & practice season and the competition schedule are correct and report back to the Compliance Office's request for confirmation.

NOTE: no competition is approved until both Compliance and the Sport Administrator have approved the event. If at any point there is a change to a competition schedule, it is the Head Coach's responsibility to inform the Sport Administrator and Compliance.

Seasons of Competition

Each student-athlete has four seasons of eligibility in any one sport. Under Ivy League rules, you are expected to use your eligibility during your first four years of enrollment. A student-athlete's participation in any intercollegiate athletic competition can cause that season to count as one of the allotted seasons of competition. Please note, the Ivy League does not recognize a "red shirt" year, referring to the practice of intentionally holding a student-athlete out of competition for an entire season.

Participation Waivers

There are several participation waivers available to Penn student-athletes that may be used to recapture a season of competition that was prematurely ended due to injury or illness.

1. **NCAA Medical Hardship Waiver** – a student-athlete may be granted an additional year of competition by the Ivy League for reasons of "hardship." Hardship is defined as an incapacity resulting from an injury or illness that has occurred under the following conditions:
 - The incapacitating injury or illness occurs in one of the four seasons of intercollegiate competition at Penn.
 - The injury or illness occurs prior to the completion of the first half of the playing season and results in incapacity to compete for the remainder of that season.
 - The student-athlete's participation in intercollegiate competition has not exceeded the greater of three contests/dates of competition or 30% of the contests/dates of competition scheduled for that sport.
2. **Ivy Non-Participation Waiver** – Per Ivy League policy, a student-athlete is charged with having used an opportunity to participate in intercollegiate athletics when he or she satisfies the academic requirements for participation and is physically able to compete. If you are seeking a non-participation waiver due to you not being physically able to compete, you must present medical documentation to support the claim.
3. **Ivy Fifth-Year Waiver** – Under Ivy League guidelines, a student is to utilize his or her first four opportunities to participate in intercollegiate athletics. Therefore, any Penn student-athlete who has not participated in four seasons of competition at the end of his or her fourth calendar-year of matriculation but wishes to participate in athletics must petition the Ivy League. The Ivy League will generally grant this waiver when it can be demonstrated that the student-athlete has:
 - A bona-fide academic reason for not completing his or her degree requirements, and
 - Not used four seasons of eligibility (supported with the Medical Hardship Waiver or Ivy Non-Participation Waiver).

Outside (Non-Penn) Teams and Competition

An **outside team** is any team that does not represent Penn's intercollegiate athletics program, or a team that includes individuals other than eligible Penn student-athletes (e.g., members of the coaching staff, ineligible student-athletes, and members of the faculty.)

Outside competition is any competitive athletic event in which the Penn student-athlete represents him or herself; or a group, organization or team other than the University of Pennsylvania's intercollegiate program.

EFFECT ON ELIGIBILITY

The eligibility of a student-athlete who engages in outside competition is affected as set forth in the following regulations.

- **Outside Competition, Sports Other Than Basketball.** A student-athlete who participates **during the academic year** as a member of any outside **team** in any non-collegiate, amateur competition becomes ineligible for intercollegiate competition unless eligibility is restored by the NCAA. A student-athlete is permitted to practice with such a team.
 - There are some exceptions to this rule when it pertains to outside competition during vacation periods. If you are interested in learning more, please contact Penn Compliance.
 - **Outside Competition, BASKETBALL.** A student-athlete who participates in any organized basketball competition except while representing Penn in intercollegiate competition in accordance with the NCAA permissible playing season becomes ineligible for any further intercollegiate competition in the sport of basketball. Contact Penn Compliance for information on summer league participation.
- **Competition as Individual/Not Representing Institution.** It is permissible for a student-athlete to participate in outside competition as an individual during the academic year in the student-athlete's sport, as long as the student-athlete represents only himself or herself in the competition and does not engage in such competition as a member of or receive expenses from an outside team. However, prior approval from your Sport Administrator and Penn Compliance is required through the Outside Competition Request Form.

Requesting Approval for Outside Competition:

To request approval for Outside Competition, student-athletes should submit the Outside Competition Form through Teamworks Compliance + Recruiting following the process in the Teamworks Compliance + Recruiting Manual.

As a best practice, submit documentation to your Sport Administrator at least five business days prior to the competition. If the student-athlete will be missing class, all documentation must be turned in prior to leaving campus.

Request to Participate in a Summer League

Over the summer, student-athletes may want to take part in a summer league. In the sports of Men's and Women's Basketball, pre-approval by Penn Compliance is required. If a student-athlete is interested in participating in summer league basketball, they must send an e-mail to Penn Compliance with the name of the summer league and the contact person.

A student-athlete is not permitted to participate in the league until he or she receives the letter from compliance approving participation in that summer league.

Occasional Meals

An occasional meal is a meal given to a team that is not in conjunction with practice or competition activities. There are only three permissible types of occasional meals:

- **Institutional Staff Members** – A student-athlete or the entire team in a sport may receive an occasional meal in the locale of the institution on infrequent and special occasions from an institutional staff member. An institutional staff member may provide reasonable local transportation to student-athletes to attend such meals.
- **Representative of Athletics Interest** - a student-athlete or the entire team in a sport may receive an occasional family home meal from a representative of the institution's athletics interest at any location. The booster or an institutional staff member may provide reasonable local transportation to student-athletes to attend such meals.
- **Occasional Meals to Team Members Provided by Relatives or Legal Guardians** - Occasional meals to team members provided by the relatives or legal guardians of a student-athlete are permissible and may be provided at any location (e.g., Tailgating)

Prior to any occasional meal, the Occasional Meal form must be completed and turned in on Teamworks Compliance + Recruiting. The meal has been approved upon confirmation from the Compliance Office.

Compliance Final Thoughts

NCAA and Ivy League rules and interpretations are constantly changing, and it is Penn Compliance's charge to help you navigate through all the rules. Please remember to always ASK BEFORE YOU ACT to minimize any potential violations.

GO QUAKERS!!