




NCAA Compliance Internal Audit Report
Project # 2015-20
June 17, 2015

Reviewed by: 
Dr. Ricardo Romo
President

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EXECUTIVE SUMMARY

Objectives:

Determine if the University of Texas at San Antonio (UTSA) Athletics Department is in compliance with the National Collegiate Athletic Association (NCAA) regulations regarding:

- Initial Eligibility Certification
- Continuing Eligibility Certification
- Transfer Eligibility Certification

Determine if appropriate access is given to coaches and staff to ensure that access to information within the Athletics Compliance Software (ACS) is only granted to authorized/known individuals.

Conclusion:

No exceptions were identified in our sample testing of student-athletes. UTSA policies and procedures are in place to ensure compliance with Initial, Continuing, and Transfer eligibility certifications of student-athletes.

However, we did identify opportunities for further improvement to the security administration procedures regarding access and password management within ACS. Most specifically the following observations were noted:

- 2 employees with active status were no longer employed with UTSA.
- 6 employees had access to high level security administration procedures which were not necessary to perform their job duties.
- Users of ACS have not been required or instructed to change passwords on a regular basis.
- The Athletics Compliance Office has no written system security procedures related to the type of access and user roles granted to Athletics staff in ACS.

The Athletics Compliance Department has addressed some of these observations and will improve their monitoring of password and access management to enhance the security administration in ACS.

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Background/Scope	<p>The NCAA Bylaw 22.2.1.2(e) requires every Division I institution to have its athletic rules-compliance program evaluated at least every four years by an authority outside of the athletics department. A university's compliance area can be divided into several sections. Over a four year period, all sections of the compliance area should be reviewed.</p> <p>Three sections are considered to have the highest risk based on NCAA guidelines:</p> <ul style="list-style-type: none">• Student-Athlete Eligibility (Reviewed in the 2009 and 2012 NCAA Compliance Internal Audit)• Financial Aid (Reviewed in the 2010 and 2013 NCAA Compliance Internal Audit)• Recruiting (Reviewed in the 2011 and 2014 NCAA Compliance Internal Audit) <p>Included in this year's review from the high risk areas listed above will be Initial Eligibility Certification, Continuing Eligibility Certification and Transfer Eligibility Certification. Additionally, the Athletics Compliance Office uses Athletics Compliance Software (ACS) to assist in monitoring high risk Athletics compliance areas. The ACS application will be reviewed for access management.</p>
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AUDIT RESULTS

Audit Objective: Determine if UTSA Athletics is in compliance with NCAA requirements regarding Student-Athlete Eligibility

Eligibility Overview	<p>UTSA shall not permit a student-athlete to represent the university in athletics competition unless the student-athlete meets all applicable eligibility requirements established by the NCAA, the member institution's conference, and the institution. While the majority of the eligibility rules relate to competition, some rules must be met prior to a student-athlete receiving institutionally administered financial aid or practicing.</p> <p>The Office of the Registrar is responsible for certifying student-athlete eligibility. Initial eligibility is completed through the NCAA Eligibility Center, an online tool the NCAA utilizes to determine if freshman are eligible. Continuing eligibility and transfer eligibility are completed by the Athletic Certification Specialist in the Office</p>
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of the Registrar. Members of the Athletics Compliance staff and the Office of the Registrar monitor the eligibility of current and incoming student-athletes. Additionally, these staff members attend NCAA Regional Rules Conferences annually and use information obtained from the conference to train Athletics' staff. To further enhance the monitoring and management of student-athlete eligibility, the Athletics Compliance Department utilizes ACS.

Initial Eligibility

UTSA Athletics comply with NCAA requirements regarding Initial Eligibility. No exceptions were identified in our sample testing. UTSA policies and procedures regarding Initial Eligibility correspond with NCAA policies and procedures.

Concerning initial eligibility, the NCAA has specific standards that incoming students must meet prior to practicing, competing, and receiving institutionally administered financial aid. A prospect who is immediately eligible for financial aid, practice, and competition upon initial enrollment at the institution is classified as a qualifier. This status is attained if the athlete graduated from high school, presented a minimum cumulative grade point average in at least 16 core courses and had a certain score on an SAT or ACT entrance exam. The sliding scale exists that compares the required GPA and test score and is detailed in Bylaw 14.3. The NCAA Eligibility Center certifies a prospect's status for the university under NCAA legislation. The prospect also must be admitted to the institution per the university's normal admissions policies. Legislation recently was enacted resulting in substantive changes to the initial eligibility standards to become effective August 1, 2016, for student-athletes initially enrolling full time in a collegiate institution on or after August 1, 2016.

Continuing Eligibility

UTSA Athletics comply with NCAA requirements regarding Continuing Eligibility. No exceptions were identified in our sample testing. UTSA policies and procedures regarding Continuing Eligibility correspond with NCAA policies and procedures.

Concerning continuing eligibility, after a student-athlete has completed his/her initial year in residence or used one season of competition, the athlete must meet the university's general requirement of "progress toward degree" as interpreted by the institution and several additional requirements as detailed in

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NCAA legislation. These include the necessity to: (i) complete a certain number of semester hours since the last season of competition and the previous semester; and (ii) declare a major and maintain a certain GPA. The progress toward degree requirements are defined in Bylaw 14.4.

Transfer Eligibility

UTSA Athletics comply with NCAA requirements regarding Transfer Eligibility. No exceptions were identified in our sample testing. UTSA policies and procedures regarding Transfer Eligibility correspond with NCAA policies and procedures.

Concerning transfer requirements, a student-athlete who transfers from one member institution to another may need to meet certain NCAA requirements. Generally, an athlete must sit out from competition at the next institution for one academic year unless the athlete meets certain transfer exception requirements.

Audit Objective: Determine if appropriate access is given to coaches and staff to ensure that access to information within the Athletics Compliance Software (ACS) is only granted to authorized/known individuals.

Athletics Compliance Software

The Athletics Compliance Software is a software application that is hosted by a third party and used by the UTSA Athletics staff to assist in managing athletics' operations, recruiting, compliance, communications, and student-athlete information. The UTSA Athletics Compliance office is responsible for administering access to the software and ensuring data integrity. Due to the nature of the system, sensitive student-athlete information is kept within. Therefore, a review of security administration procedures was conducted. The system security administration in password and access management could be improved to ensure access to the information within the ACS is granted to authorized/known individuals and at the appropriate level.

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Observation:	Two former Athletics' employees still had active access to the Athletics Compliance Software (ACS) with the most recent individual being employed more than three months ago.
Risk:	Allowing terminated employees to continue to have access to the web based database information contained in ACS could make UTSA Athletics' information vulnerable to other users.
Management Response/Action Plan:	<i>Access should be removed upon an employee's appointment being terminated. Therefore with the new Athletics' HR position, communication should improve regarding Athletics' staff leaving the department. Additionally, the Athletics Compliance staff will monitor staff changes and remove access as appropriate.</i>
Implementation Date:	<i>November 30, 2015</i>

Observation:	The Athletics Compliance Software (ACS) system at UTSA is currently not requiring users to change passwords through expiration and the configurations have not been modified to be in compliance with UTSA or industry best practice to ensure the selection of strong passwords.
Risk:	The user's password and information in ACS could be compromised.
Management Response/Action Plan:	<i>The Athletics Compliance Staff will require ACS users to use the UTSA passphrase requirements. Furthermore, the Athletics Compliance staff will inquire with ACS regarding our ability to monitor the passphrase requirements.</i>
Implementation Date:	<i>November 30, 2015</i>

Observation:	Six individuals had the highest level of security permissions in the Athletics Compliance Software (ACS) allowing them to perform security administration procedures such as adding and deleting users and modifying system configurations.
Risk:	Allowing employees an excessive level of permissions to perform tasks (i.e. adding /deleting users, configuring activities, etc.), which were not necessary to perform their job duties, could affect the integrity of information into the system whether intentional or not intentional.
Management Response/Action Plan:	<i>This has been corrected to where only the Athletics Compliance Staff has been able to add or delete users in ACS.</i>
Implementation Date:	<i>November 30, 2015</i>


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Observation:	An "Athletic Intern" and two "Volunteers" were listed as having "Sport-Operations & Sport-Coaches" permissions, respectively which allowed them to input recruiting data into the Athletics Compliance Software (ACS).
Risk:	Not defining an employee's general role in ACS and allowing employees an excessive level of permission to perform tasks (i.e. adding /deleting users, configuring activities, etc.), which were not necessary to perform their job duties, could affect the integrity of information into the system whether intentional or not intentional.
Management Response/Action Plan:	<i>Supervisors may ask some individuals to perform certain tasks regardless of title and this may require greater levels of access to ACS. These additional tasks will be monitored by the Athletics Compliance Staff and discussed should there be concerns.</i>
Implementation Date:	November 30, 2015

CONCLUSION

In our opinion, UTSA Athletics complies with NCAA requirements for Initial Eligibility Certification, Continuing Eligibility Certification and Transfer Eligibility Certification.

However, we did identify opportunities for further improvement to security administration procedures regarding password and access management within ACS.


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This engagement was conducted in accordance with The Institute of Internal Auditors' International Standards for the Professional Practice of Internal Auditing.

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Appendix A – See chart below for the 22 possible areas of review from the ACUA NCAA Audit Guide. Additionally we reviewed Athletics Compliance Software (ACS) to determine if appropriate access was given to coaches, student-athletes, and staff for assurance that access to information was granted to authorized/known individuals.

	FY13	FY14	FY15	FY16
1. Governance and Organization		X		
2. Initial Eligibility Certification			X	
3. Continuing Eligibility Certification			X	
4. Transfer Eligibility Certification			X	
5. Academic Performance Program	X			
6. Financial Aid Administration	X			X
7. Recruiting – Off Campus		X		
8. Recruiting – On Campus		X		
9. Camps and Clinics		X		
10. Investigations and Self-Reporting of Rules Violations	X			
11. Rules Education				
12. Extra Benefits – Athletic Apparel and Equipment				
13. Extra Benefits – Complimentary Admissions	X			
14. Extra Benefits – Student-Athlete Vehicles		X		
15. Extra Benefits – Team Travel				
16. Extra Benefits – Representatives of the University’s Athletic Interests		X		
17. Playing and Practice Seasons	X			
18. Student – Athlete Employment				X
19. Amateurism				X

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20. Commitment of Personnel				X
21. Commitment of Personnel to Rules – Compliance Activities – Coaching Staff Limits and Contracts				X
22. Athletics Compliance Software (ACS)			X	