

NCAA Academic Progress & Graduation Success Reporting

December 14, 2023

Report No. 187-23

Office of Internal Audit & Risk Management



DATE: December 14, 2023

TO: Kyle Moats, Director of Athletics

Casey Hunt, Senior Associate Director of Athletics/SWA

CC: Rachael Dockery, General Counsel

Zora Mulligan, Executive Vice President Clifton M. Smart III, University President

FROM: Natalie B. McNish, Director, Internal Audit and Risk Management

NCAA Academic Progress & Graduation Success Reporting

BACKGROUND

The Office of Internal Audit and Risk Management determined rotational audits of athletic programs were necessary to effectively monitor associated compliance and operational risks. Twelve categories were identified as potential risk areas and audits of each category will be completed for both the Springfield and West Plains athletic programs.

As a member of the National Collegiate Athletic Association (NCAA) Division I, Missouri State University has an obligation to ensure overall compliance with all applicable rules and regulations of the Association in the conduct of its intercollegiate athletics programs. NCAA bylaws 14 and 18 provide for the purpose, disclosure requirements, and potential reward or penalty structure related to Academic Progress Rate (APR) and Graduation Success Rate (GSR). Both of these rates are calculated annually.

OBJECTIVE AND SCOPE

The objectives were to review compliance with applicable NCAA rules, documented policies and procedures, and widely accepted business practices as they apply to reporting of APR and GSR. The scope of the review was limited to the year ended June 30, 2023.

SUMMARY

We randomly selected 60 student-athletes for review, and found only one error in the reporting of APR. This error was immediately corrected and reported to the NCAA and resulted in an increase to the APR rate. We noted two issues which are reported herein related to potential conflicts of interest with employees who have responsibilities to report APR information to NCAA and are compensated based upon the APR achieved, and future process automation which could develop efficiencies and better secure data during

the process of determining both APR and eligibility based upon academic performance. Management accepted both recommendations.

Natalie B. McNish, CFE, CGAP Director of Internal Audit and Risk Management

Internal Auditors: Arti Arti, Former Internal Auditor

Audit Fieldwork Completed: November 6, 2023

OBSERVATIONS, RECOMMENDATIONS AND MANAGEMENT RESPONSES

1. Potential conflicts of interest

Two athletic employees responsible for reporting APR data to the NCAA are also compensated based upon APR achievement. Chastity Hunt, Senior Associate Athletic Director and Senior Woman Administrator, and Daniel Raines, Assistant Director of Athletics for the Dr. Mary Jo Wynn Academic Achievement Center, both have significant responsibilities for the review and transmittal of APR data to the NCAA and both of their employment contracts provide for achievement payments of \$1,250 each should all athletic teams meet or exceed the NCAA APR cut score. A conflict of interest occurs when personal interests, like the financial incentive noted above, could compromise the decisions or actions of an employee.

2. Process automation

Process automation is needed to improve efficiency, strengthen data integrity, and limit the risk of data loss associated with the current process to determine degree progress and eligibility for student-athletes. The current process to determine eligibility and degree progress is almost entirely manual. Information from two different systems is printed and used to manually complete an internally developed form which documents the assessment of degree progress and eligibility completed for each student-athlete. These paper documents are passed between the Registrar's Office, various athletic offices, and the appropriate validation committee each semester. Each time a section of the form is completed, it is signed by the appropriate approver and then forwarded to the next area for review and reporting. This manual process creates several significant risks including data integrity or loss and the amount of employee time these processes require could be dramatically reduced through automation.

Recommendations

- 1. Either remove the financial incentive from the employee's contracts or assign review and reporting tasks to an employee who is not compensated based upon APR scores.
- 2. Consider opportunities to automate processes used to determine student-athlete eligibility and degree progress.

Management's Responses

The following responses were provided by Casey Hunt, Senior Associate Director of Athletics/SWA:

- 1. Athletics will roll the APR achievement pay into the base salary for any employee who is directly involved with APR data reporting (imputing or auditing) within their contracts beginning with the July 2024 contract renewal period.
- 2. Athletics will continue to explore the option(s) to automate the eligibility processes working with IT/Registrar/etc. as needed to see if feasible.