



**NCAA DIVISIONS I, II AND III  
AMATEURISM CERTIFICATION  
2025-26 POLICIES AND PROCEDURES**

## ADMINISTRATION

1. **Overview.** Pursuant to NCAA Division I Bylaw 12.1.1.1, Division II Bylaw 14.1.1.3 and Division III Bylaw 12.1.1.2 (international prospective student-athletes only), institutions must use the NCAA Eligibility Center to determine the validity of the information on which a PSA's amateur status is based. The amateurism certification process is governed by the policies and procedures set forth herein, as approved by the Division I Legislative Committee, Division II Legislation Committee (Legislative Review Subcommittee) and Division III Interpretations and Legislation Committee. Further, the amateurism certification process is implemented through staff's operational guidelines, which include the workflow and business practices for providing consistent, accurate and timely certifications per the policies and procedures.
2. **Jurisdiction.** The Eligibility Center certifies compliance with NCAA amateurism legislation (and Bylaw 10.1 [see Section 28]) before initial full-time enrollment at a Division I, II or III (international PSAs only) institution. This certification is limited to activities that occur before the PSA's request for final amateurism certification or initial full-time enrollment at a Division I, II or III institution, whichever occurs earlier (Division I Bylaw 12.1.1.1.1; Division II Bylaw 14.1.1.2.2; Division III Bylaw 12.1.1.2.1). However, if delayed-enrollment participation or a potential violation initially occurred before the PSA's request for final amateurism certification and related activities continued beyond the request (and before initial full-time enrollment at an NCAA school), staff may review the matter in its entirety. Further, if staff identifies information that may indicate a potential institutional violation, it may refer the matter to NCAA enforcement or conduct a joint review.
3. **Institutional Responsibility to Share Information and Report Discrepancies.** Divisions I, II and III (international PSAs only) institutions must promptly report (via the [Amateurism Inconsistency Notification Form](#)) to the Eligibility Center all discrepancies in information related to an amateurism certification and any additional information that may jeopardize a PSA's amateur status (Division I Bylaw 12.1.1.1.2.2; Division II Bylaw 14.1.1.4.3; Division III Bylaw 12.1.1.3.2). Staff will evaluate the submission and determine whether to request additional information.
4. **Conflict of Interest.** Staff members must avoid participating in any certification if a personal relationship or institutional affiliation reasonably may result in the appearance of partiality, or if they believe participation may impair or compromise the integrity of the certification. Staff members must promptly notify their supervisor upon identifying a conflict of interest.
5. **Adherence to Policies and Procedures.** National office staff members, institutional staff members, PSAs and any other individuals or representatives participating in the amateurism certification process are required to participate in accordance with the policies and procedures.

## 6. Participation.

- a. Institutional Staff Members – Primary and Secondary Contacts. The institution must designate full-time athletics compliance staff members to serve as its primary and secondary contacts for an escalated certification.

If the institution does not have any full-time athletics compliance staff members, it may designate other full-time athletics administrators to serve as its primary and secondary contacts, provided they do not have sport-specific responsibilities in the PSA's sport.

**Note:** an institutional staff member may not advise, instruct or influence a PSA or other individuals (e.g., outside team official) to answer questions in a specific manner. Staff will refer any such conduct to NCAA enforcement.

- b. Representatives. An institution, PSA or other involved individual/entity may have a representative for an escalated certification; however, staff may only communicate with the institution's primary or secondary contact (see Section 6-a).

Representatives must comply with deadlines and encourage clients (e.g., institutional staff members, PSAs, third parties) to cooperate and participate in the amateurism certification process. Failure to do so may cause a delay in resolving the PSA's amateurism certification.

## CORE CERTIFICATIONS

7. **Purpose.** Core certification is a component of the amateurism certification process designed to address issues (e.g., delayed enrollment, prize money) that may generally be identified through self-reported information and standard research protocols.
8. **Selection.** A PSA may be selected for manual core certification review based on self-reported information to the Eligibility Center, information identified via research and/or the PSA's expected date of high school graduation. Selection for manual core certification review does not indicate a violation or delayed enrollment condition has been identified. Information may be shared with an institution even if it does not warrant additional review.
9. **Assignment.** Core certifications are reviewed in the order they become ready to process.
  - a. A certification is preliminarily ready to process when a PSA is active on a current Institutional Request List and does not have any open amateurism-related tasks.
  - b. A certification is ready to process – final when the PSA is active on a current IRL, has requested final certification and does not have any open amateurism-related tasks.
  - c. An institution may request urgent review of any account that is ready to process – final. Urgent requests may be submitted via the membership portal, and staff will generally

review urgent requests within two business days. To ensure reasonable service for all PSAs and institutions, staff may remove urgent status from an account, as appropriate (e.g., excessive or unnecessary requests).

- d. When resources permit, staff may conduct a preliminary review of PSAs on a future IRL in the order of IRL activation and amateurism-related task closure.

**10. Processing.** The Eligibility Center's core certification team sends requests for information or documentation via tasks (sent through the PSA's Eligibility Center account), which are visible in the membership portal for all institutions that have the PSA on an active IRL.

### ESCALATED CERTIFICATIONS

**11. Purpose.** Certifications may be escalated to the Eligibility Center's amateurism review team if they involve complex issues that require a higher level of membership interaction.

**12. Selection.** A PSA's certification may be escalated based on established triggers (see Section No. 13), which serve as a method for managing workflow and allocating resources. Escalation does not indicate a violation has been identified. Information may be shared with an institution, even if it does not warrant additional review.

**13. Triggers.** The following scenarios may be escalated to the Eligibility Center's amateurism review team:

- a. Receipt of payment from a professional team.
- b. Funding from an outside sponsor (e.g., national governing body, governmental entity).
- c. Receipt of prize money based on place finish or performance.
- d. Professional team participation after initial full-time collegiate enrollment.
- e. National/international competition following the legislated grace period (delayed enrollment/organized competition).
- f. Agent involvement (except scholarship agents and professional service providers).
- g. Essential information from a third party is unobtainable.
- h. Other scenarios identified on a case-by-case basis.

**14. Process.** Staff will manage escalations, as follows:

- i. Assessment/Information Sharing. After a PSA's certification has been escalated, staff will contact the institution to discuss potential issues or concerns. In addition, staff will share relevant information and/or documentation with the institution.
- a. Fact Gathering. If staff determines additional fact gathering is necessary, it will request additional information and/or documentation. The institution has discretion to determine its role in fact gathering. At any point, staff may request any additional information or documentation.

The PSA's amateurism certification will remain under review until all fact gathering has concluded and all requests (including any additional requests for information and/or documentation) have been completely fulfilled.

- b. Resolution. Staff evaluates all information and applies legislation to the facts. Before rendering a final amateurism certification decision for an escalation, staff may request a factual determination by the applicable division's fact-finding committee (i.e., conflicting documentation regarding an essential fact), seek an interpretation and/or require institutional acknowledgement (via signatures from the senior compliance administrator and athletics director) of a memorandum that specifies outstanding concerns (another institution may be required to acknowledge a memorandum if the PSA transfers).

## METHODS AND STANDARDS

**15. Information Standards.** Staff considers information that is reasonably available and relevant to a PSA's amateurism certification. All references to information in the policies and procedures also encompass documentation.

- a. Relevance. Staff determines which facts are relevant to a PSA's amateurism certification.
- b. Documentation. Contemporaneous information and/or documentation (e.g., contracts, financial records, box scores, receipts, articles, social media) is weighed most heavily and should be provided whenever possible to establish facts and validate information related to a PSA's amateurism certification.
- c. Self-Reported Information and Initial Responses. In the absence of contemporaneous documentation, initial self-reported information and initial responses received as part of the amateurism certification process are weighed most heavily.
- d. Authentication. Information (e.g., documents, contracts) put forth in a certification is presumed authentic if it reasonably appears to be what it represents. If an assertion related to authenticity is produced to rebut that initial presumption, the information may be considered only if the authenticity of the assertion can be corroborated with contemporaneous documentation (e.g., club financial records).

For example, if (a) league regulations require players to sign contracts or (b) contemporaneous information (e.g., articles, social media) indicates that a PSA signed a contract with a professional team, the contract must be provided before finalizing the PSA's certification, unless the team no longer exists or provides contemporaneous documentation (e.g., financial records) showing all players under contract during the applicable time.

- e. Source Information. Staff may consider any source information (e.g., anonymous, confidential) as part of an amateurism certification.

## **16. Information Gathering.**

- a. Approved Methods. The following methods (not exhaustive) may be used to gather information in the amateurism certification process:
  - (1) Information submitted via the Eligibility Center registration process.
  - (2) Communication with the PSA, institution or any party that may have relevant information associated with a certification.
  - (3) Research (e.g., media websites, social media, articles, publicly available information, subscription-based publications and services, public records).
  - (4) Interviews.
  - (5) Documents and records requests (e.g., contracts, receipts, financial records, tax returns, legal documents, phone records).
  - (6) Information developed, gathered or received via the amateurism certification process.
  - (7) Information from other Eligibility Center units or national office departments.
  - (8) Information from other processes or proceedings (e.g., court of law, government agency, accrediting body, high school athletic association, NCAA process).
  - (9) Information from sources (e.g., confidential, anonymous).
- b. Representation of Identity. Staff members must accurately identify their NCAA affiliation when seeking information from an individual in connection with a certification. Email communication must be conducted using an NCAA email address.
- c. Information from Online Sources. Staff may not use deception or other unauthorized means to access any online system or account.
- d. Requests for Information/Documentation. When requesting information or documentation that is reasonably within a PSA's influence or control, staff may establish a reasonable deadline by which to respond.

**17. Interviews.** Staff has discretion regarding whether to conduct interviews, as necessary.

- a. Methods. Interviews may be conducted by phone, videoconference or in person. All circumstances must be evaluated in determining the appropriate interview method.
- b. Scheduling. Staff and the institution must exercise reasonable efforts to conduct interviews collaboratively when a PSA, institutional staff member or a PSA's family member(s) are involved. Circumstances that may preclude joint participation in an interview include, but are not limited to, scheduling conflicts, an individual not being within the jurisdiction of any NCAA process, issues involving multiple PSAs at more than one institution, interviews conducted for background information on a matter ancillary to a particular PSA's amateur status or interviews conducted to validate previous information.
- c. Locations. Interviews may be conducted at any location agreeable to participating parties.
- d. Notice. All interviewees who are subject to Bylaw 10.1 (prospective or current student-athletes, current or former institutional staff members) must send staff a signed interview notice before the interview.
- e. Statement of Confidentiality. All individuals who attend or participate in an interview must send staff a signed Statement of Confidentiality before the interview.
- f. Recordings. It is preferred (but not required) to record interviews. Any individual who is recording an interview must provide notice on the record to other participants.
  - (1) Notification of Start and End of Recording. At the start of a recorded interview, staff must request confirmation on the record that the interviewee understands the interview is being recorded and must obtain voice identification from all parties present for the interview. At the completion of the interview, staff must indicate the point at which the recording has stopped.
  - (2) Maintaining an Accurate Record. The parties must seek to maintain an accurate record throughout a recorded interview (e.g., identifying nonverbal communication, using exhibits, passing notes, reading from supplements or other assistance).
  - (3) Transcription. After a recorded interview, staff may request a transcription. If an interview is transcribed, all individuals who attended or participated in the recorded interview may receive a copy of the interview transcript through a secure custodial website. If the interview is not transcribed, all parties who attended or participated in the recorded interview may receive a copy of the interview recording. Staff has discretion to share a redacted interview transcript.

- g. Non-Recorded Interviews. If the interviewee objects to being recorded, the recording device malfunctions, or staff believes using a recording device would inhibit the interview, staff must prepare a written summary (within five business days) regarding the substance of the interview and attempt to obtain confirmation from the interviewee. The interviewee will be permitted to make non-substantive corrections to the written summary before affirming its accuracy. If an interviewee requests to make additions or corrections that materially alter the substance of the written summary, the new information must be treated as a separate interview. A copy of the non-recorded interview summary must be provided, on request, to any individual who participated in the interview and signed a confidentiality agreement.
- h. Participants. To encourage candid discussion, minimize undue stress for the interviewee and preserve confidentiality, attendance will be limited to the interviewee, the interviewee's representative (if applicable), an individual from the institution's compliance office and the institution's representative (if applicable). An institution's coach is precluded from participating unless that individual is being interviewed.

  - (1) Information Related to PSAs at Another Institution. The institution's representatives must be excused from any portion of an interview that relates to a PSA who attends or has committed to another institution.
  - (2) Parents or Legal Guardians. If an interviewee is a minor, the interviewee's parent or legal guardian may also be present during the interview. However, staff may determine the order and timing of interviews if the parent or legal guardian will also be interviewed.
  - (3) Roles of Interview Participants. The interviewee is expected to respond to any questions reasonably related to the matter(s) or inquiry. Another individual may not respond for the interviewee or otherwise interfere with the interview process. Objections may be noted for the record but will not be adjudicated during the interview. Any participant who unreasonably impedes the interview may be precluded from participating.
- i. Notice Requirements. The following notifications must be provided, orally or in writing, to a PSA at the start of the interview or in advance of the interview.

  - (1) Interview Purpose. To determine whether the PSA has knowledge of or has been involved in any violation of NCAA amateurism legislation.
  - (2) Complete and Accurate Information. The PSA has an obligation, per NCAA legislation, to provide complete and accurate information. Refusing to provide information or providing false or misleading information may jeopardize the PSA's eligibility.
  - (3) Confidentiality. The information discussed during the interview is confidential. Failure to maintain confidentiality may jeopardize the PSA's eligibility.



During a joint interview with another NCAA unit or department, Eligibility Center staff is not required to repeat information that has already been communicated to the interviewee.

- J. Notes Taken During an Interview.** Any individual participating in an interview may take notes during the interview. These notes constitute the individual's personal impressions, and there is no obligation to disclose such notes to any other party.

### CERTIFICATION CONSIDERATIONS

**18. Date of High School Graduation.** For Divisions I and II, a PSA's expected date of high school graduation (provided by the Eligibility Center's academic certification staff) must be used in the amateurism certification process. For Division III, a PSA's actual date of high school graduation must be used in the amateurism certification process.

- a. Questions Regarding Graduation Date Determination.** An institution should direct any questions regarding a PSA's actual or [expected](#) date of high school graduation to the Eligibility Center's customer service staff.
- b. Change in Graduation Date Determination.** If a PSA's actual or expected date of high school graduation changes after their amateurism certification decision has been issued, staff will reevaluate the certification based on the new information, provided the PSA or institution did not previously submit a high school graduation date disclaimer.
- c. Unobtainable Documentation.** In the rare circumstance in which documentation necessary to establish the actual or expected date of high school graduation is unobtainable, the institution may submit a high school graduation date disclaimer authorizing staff to establish a graduation date based on available information.

**19. Initial Full-Time Collegiate Enrollment.** When a PSA's initial full-time collegiate enrollment is relevant to the certification decision, staff may require a [matriculation letter](#) from the involved institution(s). Absent conflicting documentation (e.g., two or more matriculation letters reflect contradictory information), staff defers to the matriculation letter for determining whether a PSA has previously enrolled full time at a collegiate institution (and the initial date of full-time enrollment).

If an international school does not distinguish between full- and part-time enrollment, or if it considers all students to be full time regardless of the credit hours attempted in a term, the institution may request an [advisory opinion](#) from the NCAA International Student Records Committee regarding whether a PSA enrolled in a minimum, full-time program of studies in any quarter or semester of an academic year at an international institution.

**20. Evaluating Compensation.** In evaluating compensation, staff will identify payments (e.g., salary, stipend, bonus), which will be valued using the initial currency and evaluated based on the applicable timeframe (e.g., yearly, monthly, event-specific).

Thereafter, contemporaneously documented actual and necessary expenses (e.g., receipts, bank statements) or average household expenses in the locale, whichever total amount is greater, may be used to determine whether compensation exceeded the PSA's actual and necessary expenses. Further, this approach may also apply to individual categories of actual and necessary expenses (e.g., lodging) if the PSA's contemporaneously documented expenses exceed applicable average household expenses for the category (the application is limited to the timeframe for which contemporaneously documented expenses are provided).

The value(s) used for the average household expenses in the locale is generally based on official statistical data from the country's ministry (e.g., U.S. Bureau of Labor Statistics) and may not be disputed to the fact-finding committee for the applicable division.

- 21. Post-Enrollment Competition with Professionals.** In addition to assessing whether a team declares itself to be professional, staff may compare the team's highest-paid player to an average household in the team's locale to determine whether a PSA has participated on a professional team after full-time collegiate enrollment. If privacy laws prohibit the team from sharing its highest-paid player's compensation, staff attempts to make a reasonable determination based on its knowledge of the club and league. If staff cannot make a reasonable determination, it provides the PSA's institution all available information and may issue a final amateurism certification, noting that if new information becomes available, the PSA's certification may be reevaluated.
- 22. Currency.** Compensation, benefits and expenses must be evaluated in the currency in which they were originally received. Thereafter, such values may be converted to U.S. dollars using the most recent exchange rates available on [www.xe.com](http://www.xe.com).
- 23. Low-Level and Minimally Organized Competition.** For Division I, the delayed-enrollment exception related to low-level and minimally organized competition applies rarely and includes events such as a Turkey Trot.

## RESOLVING THE CERTIFICATION

- 24. Non-Decision Statuses.** Staff may post one of the following designations to reflect the status of a review before completing the certification process:
- a. Pending Review. The PSA's certification is under review. This includes, but is not limited to, a certification in which all fact gathering has not concluded and all requests (initial requests and any additional requests for information and/or documentation) have not been completely fulfilled.
  - b. Preliminary Reviewed. The PSA's certification has been preliminarily reviewed and more information may be requested once the PSA requests final amateurism certification.
  - c. Incomplete Web Entry. The PSA has not completed registration for one or more sports.

**25. Factual Determinations.** Staff will evaluate available information and determine relevant facts (agreement with the institution and/or PSA is not required) on which to base the final amateurism certification decision. Any information and/or documentation submitted, gathered or received may be considered. However, if conflicting documentation regarding an essential fact precludes staff from issuing a final certification, staff may request a factual determination by the applicable fact-finding committee for the division.

**26. Final Certification Decision.** A PSA's account will remain under review until staff determines all fact gathering has concluded and all requests, including any additional requests for information and/or documentation, have been completely fulfilled. Thereafter, staff will evaluate all information, apply legislation to the facts and post one of the following designations to reflect its assessment of the PSA's final certification:

- a. Final Certified. Staff has completed its review. Based on available information, the PSA is certified for competition.
- b. Final Certified with Conditions. Staff has completed its review and determined that due to participation in organized competition during a PSA's delay period, the PSA is subject to games withheld, seasons charged and/or an academic year of residence.
- c. Final Not Certified. Staff has completed its review and determined an amateurism violation occurred. The PSA may not compete until eligibility has been reinstated.
- d. Not Applicable. Staff has determined it is unnecessary to provide a certification decision for the specified division.

**27. Review Summary.** If staff determines a delayed enrollment condition applies or an amateurism violation occurred, it will post a review summary (when the PSA's final amateurism certification decision is released) that includes relevant facts.

- e. Delayed Enrollment. If staff determines a PSA is subject to delayed-enrollment legislation, a certification decision will be posted based on the applicable legislative condition (or as amended by guidelines for the [Division I Council Approved Review Process](#) or the [Division II Streamlined Review Process](#)).
- a. Amateurism Violation. If staff determines an amateurism violation occurred, a Final Not Certified decision will be posted. A member institution may request student-athlete reinstatement via Requests/Self-Reports Online.

**28. Bylaw 10.1 Procedures (Unethical Conduct).**

- a. Definition. Unethical conduct (Bylaw 10.1) by a PSA may include, but is not limited to, failure to provide complete and accurate information to the NCAA, the NCAA Eligibility Center or an institution's athletics department regarding their amateur status.

- b. Notice Regarding Bylaw 10.1. As part of Eligibility Center registration, as well as before any interview, a PSA receives notice of the obligation to provide complete and accurate information and that failure to do so may jeopardize the individual's NCAA eligibility.
- c. Bylaw 10.1 Violations. Staff may determine whether the PSA failed to provide complete and accurate information regarding their amateur status. This may include, but is not limited to, providing false information (in response to questions and/or document requests during an escalated certification) that materially impacts the PSA's certification and is subsequently contradicted by contemporaneous documentation. If a 10.1 violation is included in the PSA's review summary, the institution may seek an interpretation, similar to any other legislative application. Staff may refer the matter to enforcement if it identifies information that may indicate a potential institutional violation of Bylaw 10.1.

**29. Reconsideration Requests.** The institution may request reconsideration of a final amateurism certification decision (via the [Decision Inquiry Process](#)) based on new relevant information (supported by contemporaneous documentation) that was not reasonably available to any involved individual at the time of the previous certification decision (threshold). The reconsideration request must include a decision inquiry form (obtained via Eligibility Center customer service), a statement on letterhead that explains why the institution believes the information meets the threshold and supporting contemporaneous documentation.

Staff has discretion to determine whether the institution's reconsideration request meets the threshold (new assertions or incomplete submissions may require further inquiry). If so, staff will validate the new information, review any facts that may be affected and reevaluate the certification. If not, staff will deny or close the reconsideration request.

Staff will convey its determination within five business days of receiving a complete decision inquiry submission, and an informational task will be added to the PSA's account.

**30. Fact-Finding Requests.** The institution has 30 calendar days after a review summary has been posted to the PSA's account to provide written notice of its intent to seek a factual determination by the applicable fact-finding committee for the division (see [2025-26 Amateurism Fact-Finding Policies and Procedures](#)). By requesting an interpretation (or joint interpretation), submitting a waiver or seeking student-athlete reinstatement, the institution acknowledges agreement with the facts in the posted review summary and is precluded from seeking a factual determination.

**31. Legislative Application.** Staff will apply the legislation to the facts and issue a final amateurism certification decision. If there is an outstanding interpretive issue, staff may post a review summary to the PSA's account and submit an interpretation (or joint interpretation) before releasing the PSA's final amateurism certification.

- a. Interpretation Requests. If an institution disagrees with staff's legislative application, it may submit an interpretation request (via RSRO) to the academic and membership affairs staff. The interpretation request should include the PSA's NCAA ID number and be based on

information determined by the Eligibility Center (e.g., per the review summary) or the applicable fact-finding authority for the division.

- b. Interpretation Appeals. An institution may appeal an interpretation in accordance with the established policies and procedures for the applicable division. The appeal should be based on information determined by the Eligibility Center (e.g., per the review summary) or the applicable fact-finding authority.

### **32. Seeking Relief after Final Certification.**

- a. Student-Athlete Reinstatement Requests. If a PSA has been Final Not Certified, an institution may submit a student-athlete reinstatement request (via RSRO) to the academic and membership affairs staff. Decisions regarding certification conditions will be made in accordance with the applicable committee's policies and procedures for the division.
- b. Legislative Relief Waivers. If a PSA has been certified with a delayed-enrollment condition, an institution may submit a legislative relief waiver (via RSRO) to the academic and membership affairs staff. Decisions regarding certification conditions will be made in accordance with the applicable committee's policies and procedures for the division.
- c. Waiver and Reinstatement Decision Appeals. An institution may appeal a legislative relief waiver or student-athlete reinstatement decision in accordance with the applicable committee's policies and procedures for the division.

**33. Reevaluation After Final Certification.** If the Eligibility Center receives information regarding activities that may have occurred before the PSA's request for amateurism certification or initial full-time enrollment at a Division I, II or III institution, whichever occurred earlier, staff may reopen an amateurism certification, provided the information was not disclosed or reported to the Eligibility Center during the PSA's certification. This includes, but is not limited to, additional participation identified via the Decision Inquiry Process or additional information that has been added to a PSA's account after it has been unlocked.

If staff reopens a review, the PSA's certification decision will be changed to Pending Review until the review process concludes.

**34. Released Error Policy.** In the amateurism certification process, the Eligibility Center may apply its [Released Error Policy](#).

## MAINTAINING AND RETAINING INFORMATION

**35. Confidentiality.** Staff must maintain confidentiality in all amateurism certifications.

**a. Public Announcements.**

(1) Any public inquiries must be directed to the Eligibility Center's vice president or managing director of external affairs, who may facilitate a response in accordance with national office and department policies.

(2) If the institution, PSA or an involved individual comments publicly regarding an amateurism certification, staff may confirm such information and/or address erroneous or incomplete information.

**b. Recordings or Documents.** Staff must treat any recordings or documents (e.g., transcripts, interview summaries) prepared during a certification as confidential. Such documents may only be shared in accordance with the policies and procedures or as required by law.

**c. Confidential Sources.** To the extent permissible under law, staff must protect the identity of any confidential source. If legal action requires staff to disclose the identity of a source, the NCAA will exercise every option to limit the scope and audience of that disclosure.

Any information and/or documentation obtained as part of an amateurism certification may be shared with other national office staff members (e.g., enforcement) or as required by law.

**36. Reporting Legal or Well-Being Concerns.** Legal or well-being concerns identified during a certification may be shared with the institution and/or the NCAA's office of legal affairs, which may disclose such information to applicable entities, to the extent permissible by law.

**37. Responsibility to Maintain Information.** Staff maintains relevant information from a certification.

**a. Exclusions.** Personal notes, impressions, confidential source information and internal communications are not considered part of the case file.

**b. Information Related to Multiple Reviews.** Independent research, source information, interview summaries (or transcripts) or other documentation that may relate to one or more certifications is not considered part of the case file until such information is determined to reasonably relate to a particular certification, at which time such information must be modified as reasonably necessary to maintain the privacy of PSAs or other individuals whose circumstances are not related directly to the current certification.

**c. Document Retention.** Staff must follow the national office document retention policy.

### **38. Communication and Information Sharing.**

- a. Information Sharing. There may be rare instances when staff has information that, if shared immediately with the involved institution or PSA, could compromise the integrity of the certification, even without malicious intent to do so. In those instances, and after consulting with the director of academic and amateurism review, staff must inform the involved institution that such information will be shared in a timely manner after concluding that disclosure will not materially jeopardize the review.
- b. Communication with Compliance Administrators. Staff will only communicate with the institution's primary or secondary contact (see Section 6-a) related to an escalated certification (coaches may not be involved in such conversations); however, staff also may request information directly from the PSA, who should work closely with the athletics compliance office. If the PSA appears on multiple active IRLs but has not signed an athletics aid agreement, staff will ask the PSA to designate an institution for their certification.
- c. Confidentiality. All individuals who participate in a PSA's amateurism certification must treat all information and documentation (e.g., records, transcripts) as confidential.
- d. Communication with Other Member Institutions. Staff may not share information with a member institution regarding an amateurism certification unless the involved PSA is active on the institution's IRL, does not have a valid athletics aid agreement with another institution and is not enrolled at another institution. However, staff may communicate information that has been sufficiently redacted or aggregated to support the governance process or serve as a resource for the amateurism certification process.