DIVISION III FINANCIAL AID

ANNUAL REPORTING PROCESS

AND

FINANCIAL AID DATA MANAGEMENT SYSTEM (FADMS)

USER'S MANUAL

JUNE 1, 2024

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1. INTRODUCTION.

a. NCAA Governing Legislation.

Legislative Language: 15.3.1 Consistent Financial Aid Package.

The composition of the financial aid package offered to a student-athlete shall be consistent with the established policy of the institution's financial aid office, regular institutional agency, office or committee for all students and shall meet all of the following criteria:

(1) A member institution shall not consider athletics leadership, ability, participation or performance as a criterion in the formulation of the financial aid package;

(2) The financial aid procedures used for a student-athlete are the same as the existing official financial aid policies of the institution; and

(3) The financial aid package for a particular student-athlete, group of student-athletes or team of student-athletes cannot be clearly distinguishable from the general pattern of all financial aid for all recipients at the institution.

15.3.1.1 Annual Electronic Report **Effective Date: August 1, 2005:**

An institution shall submit an annual electronic report which includes data regarding the financial aid packages awarded by the institution to freshman and incoming transfer student-athletes and to other incoming students. The policies and procedures of the financial aid reporting process shall be established by the Financial Aid Committee and subject to approval by the Management Council. *(Adopted: 1/12/04 effective 8/1/05 revised 4/14/08)*

Committee Composition: 10 members. A minimum of two, but no more than three members from each Division III geographical area; one Management Council representative; one Student-Athlete Advisory Council member; minimum of three members who identify as female; minimum of three members who identify as male, minimum of two members who identify as Black, Indigenous, People of Color (BIPOC); minimum of one conference office staff; minimum of one Faculty Athletics Representative; minimum of one public institution/multi-sport conference representative; and no multi-sport conference shall be represented by more than one individual on each committee. At least three members shall be financial aid administrators, one of whom shall be from a public institution.

If you have questions regarding interpretation of this legislation, please contact Eric Hartung, 317/917-6306, ehartung@ncaa.org.

b. Description of the Process.

The Division III membership adopted 2004 NCAA Convention Proposal No. 56, which established an annual electronic reporting process that requires all institutions to compare the financial aid packages of freshmen and transfer student-athletes with the aid packages of other freshmen and transfers. The delayed effective date of August 1, 2005 allowed for the modification of reporting criteria and establishment of report review parameters and program procedures by the Financial Aid Committee prior to full implementation in 2005.

As suggested at the 2004 Convention and confirmed by the Financial Aid Committee and the Division III Management and Presidents Councils, the annual reporting process will provide institutions with an educational tool for self-assessment of compliance with Bylaw 15.

c. An overview of the process.

(1) The Financial Aid Data Management System (FADMS), a web-based software package, will facilitate the process.

(2) Institutional self-assessment is possible through the generation of a date-stamped interim school profile report.

(3) To meet NCAA requirements, a data file containing the required information will be submitted electronically to the NCAA for a systematic review.

(4) Each institution will receive notification that a date-stamped school profile report is available for download from the FADMS.

(5) The Financial Aid Committee will review school profile reports where one or more review triggers are present and communicate a request for justification of the perceived non-compliance with financial aid legislation.

(6) The institution that has received a request for justification of perceived non-compliance with financial aid legislation is required to respond to the Financial Aid Committee.

(7) All justifications of perceived non-compliance with financial aid legislation will be reviewed at the February meeting of the Financial Aid Committee followed by correspondence with the institution.

(8) When evidence of non-compliance is found, the Financial Aid Committee will forward the case to NCAA enforcement for processing.

d. Deadline.

Official submission of the institution's data file to generate the final report and satisfy the requirements for the Division III Financial Aid Annual Electronic Reporting Process is required by Friday September 13, 2024. Submission of data files will be accepted any time prior to September 13. A report review period will ensue, including the posting of a date-stamped school profile report following submission of data on the FADMS. The president/chancellor, designated financial aid officer and the athletics director will receive e-mail notification that the report is available for download.

For the 2024-25 reporting cycle, participating institutions will have a three-month timeframe, June 1 through September 13, to submit their 2023-24 academic year financial aid data file. The final submission deadline for the 2024-25 reporting cycle is September 13, 2024.

e. Contact Information.

For technical questions such as file layout, variable definitions, or functionality of the FADMS as well as questions pertaining to the interpretation of reports or other general issues, please contact: **Eric Hartung, 317/917-6306,** ehartung@ncaa.org.

For questions concerning the committee review process or interpretation of NCAA legislation, please contact **Eric Hartung, 317/917-6306,** ehartung@ncaa.org.

2. DATA COLLECTION.

a. The Financial Aid Data Management System (FADMS)

The Financial Aid Data Management System (FADMS) has been established to facilitate the Division III Financial Aid reporting Process. The FADMS is a Web-based software program with three primary functions: 1) data file upload; 2) data file submission and 3) report generation. The FADMS allows for member institutions to perform a self-analysis, which is one of the basic tenets of the overall process. It also allows the NCAA to gather the necessary data to maintain the parameters of a comprehensive review process and, in turn, to assess compliance with relevant NCAA financial aid bylaws. The FADMS can be accessed through the single-source sign-on program (SSO).

(1) Accessing the FADMS via SSO

FADMS users must have an individual NCAA.org account (user ID and password). If one doesn't already exist, please contact your institution's SSO administrator (typically the Director of Athletics). Once access has been assigned and users have logged back into NCAA.org/My Apps, users may then access FADMS by clicking the appropriate link located on the screen.

(2) Submission of Data

Data files can be uploaded via the upload function in the FADMS in order to generate a school profile report and to perform the final submission. If an alternate final submission method is desired, please contact Eric Hartung at the national office.

(3) Submission Deadline

The Financial Aid Committee agreed that institutions will have a three-month timeframe, June 1 through September 13, to submit their financial aid data file. The final submission deadline for the 2024-25 reporting cycle (data from the 2023-24 academic year) is Friday September 13, 2024.

An institution may submit a formal request to the Financial Aid Committee through Eric Hartung, committee liaison (ehartung@ncaa.org) for an extension to the reporting deadline. The Financial Aid Committee may extend an institution's deadline if the institution is able to provide adequate explanation for not being able to meet the established deadline. The length of the extension will depend on the institution's circumstances.

b. The Cohort

(1) Cohort Definitions

a. The Undergraduate Cohort

The final submission file for the Undergraduate Cohort will contain final financial aid package data on **ALL** FULL-TIME, FIRST-TIME STUDENTS ENTERING YOUR INSTITUTION IN THE ACADEMIC YEAR REQUESTED. For example, the data file submitted for the 2024-25 reporting cycle will include all freshmen, transfers and mid-year enrollees who entered your institution in the 2023-2024 academic year as full-time students. This group includes athletes and non-athletes, international students who enrolled full time during the academic year in question and students who DID NOT receive a financial aid award as well as those who DID receive an award.

Institutions are asked to ensure that the additional criteria of "degree-seeking at your institution" be implemented when applying this definition.

It should be noted that when applying this cohort definition, "traditional" and "non-traditional" students may be captured. If a school policy exists that deems non-traditional students "ineligible" to participate in intercollegiate athletics, please contact Eric Hartung (ehartung@ncaa.org) for guidance concerning the application of the cohort definition. Also be reminded that the established review process is available for any institution that is requested to provide justification for their perceived non-compliance and believes the elevated review indicator(s) have been caused by this broad application of the cohort definition.

b. Graduate/Post-Baccalaureate Transfer Student-Athlete Cohort

The final submission file for the Graduate/Post-Baccalaureate Transfer Student-Athlete Cohort will contain final financial aid package data on **ALL** FULL-TIME, FIRST-TIME STUDENT-ATHLETES ENTERING YOUR INSTITUTION AS GRADUATE/POST-BACCALAUREATE STUDENTS IN THE ACADEMIC YEAR REQUESTED. For example, the data file submitted for the 2022-23 reporting cycle will include all transfer student-athletes that enrolled in a graduate/post-baccalaureate studies program at your institution in the 2023-2024 academic year as first time, full-time students.

Division III rules, effective with the 2019-20 academic year, allow students who enrolled in a different Division III institution from where they completed their undergraduate degree to complete their available years of athletics eligibility at the new school while enrolled full-time in a graduate/post-baccalaureate studies program.

This data file will contain student-athletes only that meet the Graduate/Post-Baccalaureate Transfer Student-Athlete Cohort. Unlike the Undergraduate Cohort file, this file will contain student-athletes ONLY.

Financial Aid Administrators are instructed to contact the Athletics Department to determine which student-athletes, if any, meet the definition and therefore be included in the data file. If no student-athletes meet the cohort definition, no data file is submitted.

(2) Student-Athlete Definition

A student-athlete is an individual listed on the institution's official roster on or after the first scheduled contest or date of competition in the NCAA championship segment. Only NCAA-sponsored sports are required for file upload. The NCAA three-letter sport code will be included in the uploaded data file to identify the sport in which the student-athlete participated. A comprehensive list of NCAA-sponsored sports and the associated three-letter code for each sport can be found in the FADMS, as well as on pages 6 and 7 of the manual. Athletics departments are strongly encouraged to establish an electronic system to identify student-athletes by the year they entered the institution and forward this information to the necessary institutional personnel for inclusion in the data file.

For multi-sport athletes, each sport in which the student-athlete meets the prescribed definition of a student-athlete will be included in the uploaded data file. Three columns (SPORT1, SPORT2 and SPORT3) must be built into the data file to enable the capturing of up to three sports for an individual student-athlete.

(3) NCAA-Sponsored Sport

An NCAA-sponsored sport is a sport in which the NCAA sponsors a championship, an emerging sport for women, or one in which your institution has received a waiver from the Division III Membership Committee to count as a sport for sponsorship purposes.

Each institution's list of the sports required for inclusion in the data file is available through the link provided in the file upload module of the FADMS.

MEN'S SPORTS

MBA	Baseball
MBB	Men's Basketball
MCC	Men's Cross Country
MFB	Football
MFE	Men's Fencing
MGO	Men's Golf
MGY	Men's Gymnastics
MIH	Men's Ice Hockey
MLA	Men's Lacrosse
MRI	Men's Rifle
MSK	Men's Skiing
MSO	Men's Soccer
MSW	Men's Swimming
MTE	Men's Tennis
MTI	Men's Track, Indoor
MTO	Men's Track, Outdoor
MVB	Men's Volleyball
MWP	Men's Water Polo
MWR	Men's Wrestling

WOMEN'S SPORTS

WAT	Women's Acrobatics & Tumbling
WBB	Women's Basketball
WBW	Women's Bowling
WCC	Women's Cross Country
WCR	Women's Rowing
WFE	Women's Fencing
WFH	Field Hockey
WGO	Women's Golf
WGY	Women's Gymnastics
WIH	Women's Ice Hockey
WLA	Women's Lacrosse
WRI	Women's Rifle
WRU	Women's Rugby
WSB	Softball
WSK	Women's Skiing
WSO	Women's Soccer
WSV	Women's Beach Volleyball
WSW	Women's Swimming
WTE	Women's Tennis
WTI	Women's Track, Indoor
WTO	Women's Track, Outdoor
WTL	Women's Triathlon
WVB	Women's Volleyball
WWP	Women's Water Polo
WWR	Women's Wrestling

CO-ED SPORTS

XCC	Mixed Cross Country
XFE	Mixed Fencing
XGO	Mixed Golf
XGY	Mixed Gymnastics
XRI	Mixed Rifle
XSK	Mixed Skiing
XSW	Mixed Swimming
XTE	Mixed Tennis
XTI	Mixed Track, Indoor
XTO	Mixed Track, Outdoor

c. What is the role of the athletics department in the reporting process?

If the institution does not currently maintain a central system, athletics departments are strongly encouraged to establish and maintain an electronic system to identify student-athletes who meet the definition of a student-athlete with the appropriate three-letter sport code by the year they entered the institution. This will allow for the merging of the sport codes into the data file compiled by the institution.

d. How does the process account for Division I student-athletes on a Division III campus?

Division I student-athletes are required to be included in the submitted data file but are not to be identified as student-athletes.

e. How do multi-division institutions report NCAA Division I student-athletes' financial aid data?

There are 10 Division III institutions that sponsored a Division I sport(s) in 2023-24. Those schools are:

School	**Sport**
Clarkson University	Men's Ice Hockey Women's Ice Hockey
Colorado College	Men's Ice Hockey Women's Soccer
Franklin & Marshall College	Men's Wrestling
Hobart College	Men's Lacrosse
Johns Hopkins University	Men's Lacrosse Women's Lacrosse
Massachusetts Institute of Technology	Women's Rowing
Rensselaer Polytechnic Institute	Men's Ice Hockey Women's Ice Hockey
Rochester Institute of Technology	Men's Ice Hockey Women's Ice Hockey
St. Lawrence University	Men's Ice Hockey Women's Ice Hockey
Union College (New York)	Men's Ice Hockey Women's Ice Hockey

For these institutions DO NOT IDENTIFY AS STUDENT-ATHLETES in the submitted data file those who participated in that sport and met the cohort definition. These individuals who were participants in the Division I sport and met the cohort definition must be included in the submitted data file, but simply not identified by the sport code associated with the Division I sport.

f. How are international students or students who do not complete a FAFSA accounted for?

The institution must include the financial need calculation used to determine the financial aid award for every student in the uploaded data file.

In the event the student has not submitted a FAFSA, yet need-based financial aid has been awarded, the institution shall provide the financial need calculation used in the determination of the financial aid package based on other official documentation (e.g., The College Board's International Student Financial Aid Application). The financial need field in the uploaded data file cannot be left incomplete, or "missing." If a student is considered as "no need" a zero must be included in the field.

A cost of attendance must be included for each student in the data file. If a cost of attendance has not been calculated because the student has not submitted a FAFSA, a cost of attendance figure must still be included, using the institution's standard budget for that particular student-type. This will facilitate accurate calculations in the institution's report.

If a student has not submitted a FAFSA, an estimated family contribution figure is not required in the submitted dataset (i.e., the estimated family contribution field should be left blank, or missing). A "missing" estimated family contribution will be used to identify students who have not submitted a FAFSA or where a financial need analysis has not been conducted.

g. Why is it required to input a zero (0) in the Financial Need field for individuals who did not have a Financial Need calculation conducted?

Whether a student had a financial need calculation conducted resulting in a zero or a financial need calculation was not conducted, the data analysis will treat both cases as "no need." The input of a zero (0) in the Financial Need field has been made a requirement to ensure that the reporting institution understands clearly how this situation will be handled. For example, an institution that has a strict "need-based only" policy will not award financial aid to those students who did not have a calculated need or who did not file. An institution, however, that does award non-need-based aid (i.e. merit aid), may award aid to those students who did not have a calculated need or who did not file. The requirement of the zero has been implemented to ensure that institutions that offer non-need-based awards are clear that a financial need calculated as zero will be treated the same as a "missing" financial need.

h. With the requirement to input a zero (0) in the Financial Need field, how will the analysis distinguish between those who have a calculated financial need of zero and those who do not have a financial need calculated, therefore having a "missing" financial need?

In terms of the analysis to detect bias in the awarding of gift aid to student-athletes versus other students, this distinction is not a factor. The statistical models employed will carefully account for zero need, or no need, as well as zero awards.

i. Is this distinction important when evaluating potential bias in packaging between student-athletes and other students?

The distinction between these groups of individuals – those with a calculated zero need and those with a "missing" need – may be important during the evaluation of potential bias during the review process. It may have a significant effect on the information presented in the sport-by-sport breakdown field where the two groups are mixed. By cross-referencing Estimated Family Contribution, which would be input as missing when no need-analysis was conducted, and the Financial Need field, the analysis can distinguish between those who had a need analysis conducted and those who did not. Therefore, these two groups can be identified.

j. At what point in time should the Financial Aid Award be "captured?" The Financial Aid Award may change throughout the course of the awarding process. Should the Financial Aid Award reported be the award "offered" or the award "accepted" by the individual?

Due to the fact that the Financial Aid Award may change throughout the awarding process and that institutions may not have a standard means of "capturing" the amount at the point of "offer", the Financial Aid Award that will be reported is the award "accepted" by the individual.

k. How will the reporting account for students who receive aid for a portion of the academic year? Will the aid totals be "annualized?"

The aid totals, as well as the other corresponding data points (e.g., Cost of Attendance, Expected Family Contribution, Financial Need, etc.) should not be annualized. Reported totals should reflect only the term(s) for which the student was enrolled. If, however, you cannot provide "clean" amounts for the enrolled term but can provide accurate "annual" data for these students, this will be acceptable. The intent is to capture the Cost of Attendance, Expected Family Contribution, Financial Need, and gift aid the student received while enrolled at the institution. We realize that institutions may have varying procedures for one-term students depending on when the students enter the institution and when they terminate their attendance. Every effort should be made to provide accurate amounts for the actual terms of enrollment.

l. Why does the process focus on the gift aid portion of the financial aid award?

The Financial Aid Committee concluded: 1) the gift aid portion of the award is most likely where any inequitable packaging between student-athletes and other students is taking place; 2) NCAA bylaws specifically identify the gift aid portion of the award; and 3) focusing on the gift aid portion only will assist in decreasing the burden associated with the reporting process.

m. How does an institution conduct a "self-assessment?"

An interim school profile report can be generated at any time following the upload of a data file. These "instant" reports are a valuable self-assessment tool. The report is comprised of four sections: 1) Introduction; 2) Key Financial Aid Indicators; 3) Summary Tables, and 4) Summary Figure.

A self-assessment will ensure that the data being submitted in the Final Data Submission is accurate. When conducting an assessment, please carefully review each of the tables and note, among other things, the number of student-athletes and other students in the incoming class, average Cost of Attendance, the number of student-athletes in each of the sports, and the total Institutional Gift Aid awarded. If any of these figures appears inconsistent with what would be expected, please review your data file before final submission. Once a final submission occurs, data can only be corrected through an appeal to NCAA staff.

Additionally, the Policies and Procedures Worksheet included in Appendix 3 can be used to guide you through a self-assessment of your policies and procedures for administering student financial aid, as well as the impact of those policies and procedures. This is the same tool used by the Division III Financial Aid Committee when conducting the Level II Review.

"Staying Compliant with NCAA Division III Financial Aid Requirements" is an additional resource to guide a self-assessment.

n. What is a sport outlier?

A sport outlier occurs when a significant number of institutional gift aid awards in a given cohort are clustered in a particular sport. An institutional gift aid award outlier is defined as an award amount two or more standard deviations above the mean difference between the statistically predicted institutional gift aid award based on financial need and the actual institutional gift aid award for all students in the cohort. The number of outliers in a particular sport required to trigger sport outlier status is determined using the thresholds established by the Division III Financial Aid Committee.

Details of the sport outlier can be found in Appendix 5.

o. What is the estimated variance?

The estimated variance is the result of a statistical model that tests for the dollar impact of student-athlete status (yes or no, i.e. aid received by student-athletes versus aid received by other students) on the amount of gift aid as a function of financial need. The statistical model accounts for the potential situations of students with zero need receiving zero gift aid awards and students with greater than zero need receiving zero gift aid. These estimated variances are reported with 95 percent statistical confidence. Therefore,

an upper and lower boundary of confidence is reported. The lower boundary represents the lowest estimate of bias in gift aid for student-athletes at the institution and the higher boundary represents the highest estimate of bias in gift aid for student-athletes at the institution. To calculate the lower confidence boundary of the variance estimate as a proportion, the lower confidence boundary in dollars is divided by the average financial need of the student-athletes. Keep in mind that that variance estimate calculation does not account for the degree to which your institution engages in non-need-based student financial aid packaging.

See Appendix 4 for a technical paper concerning the calculation and interpretation of the variance estimate.

p. When will the school profile report be distributed?

A date-stamped school profile report will be available to the institution soon after the final submission of data.

q. Who will receive notice of the report posting?

An e-mail will be sent to the institution's primary financial aid contact and athletics director notifying them that the post-submission school profile report is available for download from the FADMS.

r. What are the review policies and procedures?

For a Level I Review to be initiated, the institution's case must meet one of the following conditions:

1. The identification of statistical outliers on these two measures:
    a. The difference in the proportion of financial need met by institutional gift aid between student-athletes and other students (see Key Financial Aid Indicators in school profile report).
    b. The proportionality test comparing the proportion of student-athletes in the cohort to the proportion of overall institutional gift aid awarded to them (see Key Financial Aid Indicators in school profile report).
2. A significant number of outliers are present in a sport in the current reporting cycle (see Key Financial Aid Indicators in school profile report).
3. There was no action taken on the case with the condition of continuing review in a prior reporting cycle.
4. The case had been referred to enforcement for processing of a violation in the previous reporting cycle.
5. The institution is a provisional or reclassifying member of Division III. Provisional and reclassifying institutions will initially be reviewed in the second year of the membership process pursuant to Division III Bylaws 20.10.5.1 and 20.6.5.1 which

details the requirement of these institutions to participate in the financial aid reporting program beginning in the second year.

An expedited review process has been implemented as a precursor for the Level I review for cases where no action was taken at the Level I or Level II reviews in prior reporting cycles but have met one of the Level I triggers regardless. The process is:

1. The review triggers are used to determine which cases will be subject to a Level I Review.
2. From this group, NCAA staff will identify which cases were reviewed at Level I or Level II in the previous reporting cycle and no action was taken.
3. NCAA staff will also identify cases where no action was taken at the Level I or Level II review in any past reporting cycle provided the case was not was not processed with any conditions or referred to enforcement during any of the reporting cycles between the no action decision and the most current cycle. These would be cases that did not trigger a review each cycle but where no action was taken at some point.
4. A subcommittee of the Financial Aid Committee will be forwarded the cases for review.
5. This subcommittee will convene and will, with the assistance of NCAA staff, review each case.
6. The subcommittee has two possible review outcomes:
   a. Take no action; or
   b. Forward to Level I for full committee review.
7. For those cases where no action was taken, the institutions will be notified on the same timeline that all other pre-Level I case decisions are distributed.
8. The full committee will receive an expedited review report.

The criteria used in the Level I review include, but are not limited to, statistical considerations (e.g., sample size, confidence interval), the proportion of student-athletes in incoming class, the gift aid as a proportion of cost of attendance, packaging methodology, the bylaw proportionality test (proportion of student-athletes of entering class compared to proportion of total institutional gift aid awarded to student-athletes), the financial need bracket assessment, the sport-by-sport breakdown assessment and an historical review.

A possible outcome of the Level I review is a request for justification of an institution's perceived non-compliance with financial aid legislation, related questions concerning the institution's financial aid report and other statistical outliers present in the report. A guide has been developed to help the institution compile the justification. The Policies and Procedures Worksheet can be found in Appendix 3.

Within the letter requesting justification the Committee will ask specific questions. The Committee would like direct answers to those questions. The institution is requested to use the questions put forth in the Policies and Procedures Worksheet to help shape the

justification. An adequate justification is one that has considered each of the questions in the worksheet. It is important to be clear, complete, and concise in the justification. To ensure that all relevant information is included, it also is important to include all key personnel on campus when drafting the justification, including presidents and chancellors, and those who hold leadership positions in financial aid, student recruitment, and athletics.

Following the receipt of the justification, a Level II review ensues, conducted by the Financial Aid Committee at their in-person February meeting. There are four possible outcomes:

(1) No action.

(2) No action with a conditional review in the subsequent reporting cycle.

(3) A request for additional information from the institution.

(4) Refer the case to NCAA enforcement for the finding of non-compliance with the NCAA Bylaw 15.

s. <u>If an institution's justification is not accepted, how will enforcement be involved?</u>

If the Financial Aid Committee finds evidence of non-compliance with Bylaw 15 for active Division III members at the Level II Review, that institution's case will be forwarded to enforcement for processing. The Financial Aid Committee referral will include a detailed account of the evidence of a potential violation found through the reporting process as well as recommendations for sanctioning and/or further investigation. Enforcement will take the committee's recommendation into account as they process the finding, yet the ultimate decision concerning imposition of sanctions will be made by enforcement and the Committee on Infractions. Enforcement will correspond with the school directly throughout the enforcement process.

t. What penalties may an institution with an unacceptable justification be subject to?

Upon referral to enforcement for active Division III members found to be in violation of Division III Financial Aid bylaws, the Financial Aid Committee will recommend sanctions singly or in combination. Among the disciplinary measures identified by the committee as appropriate and reasonable are:

a) Completion of a comprehensive athletics compliance assessment;
b) Public reprimand;
c) An institutional fine;
d) Ineligibility for access to NCAA benefits and services;
e) Ineligibility of the member institution to vote or its personnel to serve on committees of the association, or both;
f) Ineligibility for NCAA championship events;
g) Prohibition against an intercollegiate sports team or teams participating against outside competition for a specified period;
h) Loss of institutional NCAA active membership status; and
i) Other disciplinary action recommended by the committee.

The ultimate decision concerning the imposition of sanctions will be made by NCAA enforcement and the Division III Committee on Infractions.

u. How will confidentiality and anonymity be maintained throughout the process?

Confidentiality and anonymity of students, as well as confidentiality of the institution, are of paramount importance to the NCAA.

Access to the FADMS is limited to the institution's single-source sign-on administrator and any other institution employee given access by the administrator.

All data will be secured and stored on NCAA servers with data access limited to the NCAA research staff through a password protected data management system.

Individual record confidentiality will be accomplished through the use of a unique identification code (e.g., a code other than the student's Social Security Number) established by the institution prior to data file submission. To ensure anonymity of the student during the analysis of data, the unique identifiers will be removed from the copy of the submitted dataset that will be used for analysis by NCAA research staff.

Confidentiality of the institution during the analysis and review process will be maintained through the use of a unique identification code established by the NCAA research staff. Only NCAA staff will know the identity of the institutions under review.

To maintain and ensure the confidentiality and anonymity of individuals and institutions through the reporting phases, the data will be aggregated to an appropriate level.

Reporting will be suppressed if the individual record level falls below three (3) in the need-bracket or sport-by-sport breakdown.

3. COMPILATION OF THE DATA FILE.

a. General Formatting.

The submission files should be formatted to the sequenced data element layout in a variable length "flat" file, using tab as the delimiter and ".txt" as the three-letter file extension. Each field must be separated with this delimiter, including fields left blank. Carriage returns or line feeds act as the record separator.

A file created in Microsoft Excel (*.xlsx) can be converted into the tab-delimited *.txt format by clicking the "File" menu in the upper left corner of the program followed by the "Save As" command. Use the pull-down menu next to "Save as type:" and choose "Text" (Tab delimited) (*.txt). Finally, click "Save".

General formatting requirements:

(1) Fields containing missing sport codes will be tab-filled.
(2) Do not include dollar signs, commas or decimal places.
(3) Round all dollar amounts to the nearest dollar.
(4) Zeroes should replace missing numerical data elements where applicable. The exception to this requirement is the estimated family contribution field where a missing EFC field will be tab-filled.
(5) Do not include variable names in the first row of the file.

A detailed file layout guide can be found in Appendix 1 and a sample file can be found in Appendix 2.

b. Definitions of Data Elements.

(1) Unique Identification Number (ID): This unique identification number will be used to protect the identity of individuals included in the report. It is requested that the institution retain the ability to link this unique identifier to the actual student financial aid record. This is necessary because of the justification phase of the review process where the institution could be required to provide justification for financial aid records.

(2) Sport (SPORT): The official three-letter NCAA sport code will be included in the uploaded data file to identify student-athletes and their sport. A student-athlete is an individual listed on the institution's official roster on or after the first scheduled contest or date of competition in the NCAA championship segment of the academic year requested. It will be the responsibility of the institution's athletics department to compile the necessary information and provide it to the financial aid office to include in the data file. A complete list of NCAA-sponsored sports and the associated three-letter code for your institution can be found on the FADMS file upload page.

(3) Cost of Attendance (COA): The cost of attendance includes tuition, fees, living expenses, books, personal and travel allowance. There may be multiple COAs for an individual institution (e.g., in-state and out-of-state tuition, dormitory and off-campus living). Provide the COA used to determine the financial aid package. A COA (greater than zero) must be supplied for each student even if a needs analysis is not conducted. If a COA was not calculated, please include a general COA based on the institution's standard budget.

(4) Expected Family Contribution (EFC): The expected family contribution includes the parent contribution, student contribution from work income, and the student contribution from assets. If an EFC cannot be calculated for a student, leave the field missing. A missing EFC will be used to identify students where a need analysis was not conducted.

(5) Financial Need (FN): The financial need is generally calculated by subtracting expected family contribution (EFC) from the institutional cost of attendance (COA). FN is calculated for each student through federal methodology or institutional methodology. The institution will include the FN used in determination of the financial aid award for each student in the uploaded data file.

In the event the student has not submitted a FAFSA, yet need-based financial aid has been awarded, the institution shall provide the financial need calculation used in the determination of the financial aid package based on other official documentation, (e.g., The College Board's International Student Financial Aid Application). The FN field in the uploaded data file cannot be left incomplete, or "missing". In this case a zero must be entered and the student will be considered as having "no need".

(6) Federal Pell Grant (PELL): This grant for the most needy of students is determined by the U.S. Department of Education's calculation of the EFC versus the COA at the school. They may be credited either to school accounts or paid directly to students. The total Pell Grant will be included in the data file.

(7) Federal Supplemental Opportunity Grant (FSEOG): This grant is administered by the institution's financial aid office and is based on need. It is intended for students with the lowest EFC's, typically Pell Grant recipients. The total FSEOG will be included in the data file.

(8) State gift aid (SGA): This gift aid is awarded by state governments and agencies and is based on various criteria (e.g., financial need, academic achievement, or special status). The total SGA will be included in the data file.

(9) Institutional gift aid (IGA): Individual institutions award this gift aid to students based on various criteria (e.g., financial need, academic achievement, special status). Institutional merit scholarships are included in this category. The total IGA will be included in the data file. DO NOT include tuition remission, tuition exchange or similar employee benefits in this category.

(10) Private/Outside gift aid (POGA): This gift aid is awarded to students by private entities based on various criteria (e.g., financial need, academic achievement, special status). The total POGA will be included in the data file.

(11) Other gift aid (OGA): This category may include items such as tuition remission, tuition exchange and similar employee benefits. The total OGA will be included in the data file.

(12) Federal or State Work Study (WS): The federal or state work study program is administered by the institution's financial aid office and is based on need. It provides minimum wage, or greater, jobs on- and off-campus. The institution will indicate for each student whether (yes or no) federal or state work study was included as part of the financial aid award.

If Federal or State Work Study was offered to the student as part of a financial aid package, please indicate this as a 1, regardless if the student actually accepted the offer or worked in a position. If the student was not offered a position through a financial aid package, please assign a 2 to this student.

(13) Campus Employment Program (CEP): The campus employment program is an institutional level program and is separate from federal work study. It may be administered by offices other than the financial aid office. The institution will indicate for each student whether (yes or no) a campus employment program was included as part of the financial aid award.

If Campus Employment was offered to the student as part of a financial aid package, please indicate this as a 1, regardless if the student actually accepted the offer or worked in a position. If the student was not offered a position through a financial aid package, please assign a 2 to this student.

(14) File Version Number (VERSION): This field applies to the Graduate/Post-Baccalaureate Transfer Student-Athlete Cohort File ONLY. Populate this field with the number 1 on each record line of the data file.

4. FINANCIAL AID DATA MANAGEMENT SYSTEM TECHNICAL INSTRUCTIONS.

a. Login.

(1) Access the program via the single-source sign-on program.

b. Main Page.

(1) Links to all FADMS functions can be found in the "Account Links" box that appears in the upper left corner of the screen.

(2) Dated communications from NCAA staff will appear in the center portion of the screen with the most recent communication listed first.

(3) NCAA contact information is available on this page as well as every page of the FADMS.

The Data File Upload and Final Data Submission process outlined below is the same for both the Undergraduate Cohort File and the Graduate/Post-Baccalaureate Transfer Student-Athlete Cohort File. The upload and submission processes must be performed twice and in order of Undergraduate Cohort File FIRST and Graduate/Post-Baccalaureate Transfer Student-Athlete Cohort File SECOND to successfully submit both files.

c. Data File Upload.

(1) Click the "File Upload" link in the "Account Links" box.

(2) Click the "Browse" button and locate the desired upload data file. Click "OK".

(3) Click "Upload". The "Data File Upload" process may take a few moments to complete. When the process is complete, a message will appear indicating that the upload was successful. If the uploaded data file did not meet the required specifications, a box will appear detailing any warnings or errors.

(4) An error message may appear following the upload process if sport codes were included in the uploaded file that could not be found in the official sports sponsorship list on file with the NCAA. A "be advised" message may also appear if the uploaded file did not include sport codes that appear on that same list. At this point you will be given the opportunity to return to the data file, make any adjustments and upload the file again, or you may proceed with the Interim Report generation or the final submission process. **Please note** that a "be advised" message does not preclude final submission. It is merely intended to alert you to data that may be erroneously missing.

(5) An error message may appear following the upload process if the specifications of the file do not meet the upload requirements. For example, missing data may have been detected, values exceeded the allowable limits or unacceptable formatting existed in the data file. The record line and a description of the error will appear on the screen. At this point, it will be necessary for you to return to the data file, make the required adjustments and upload the file again.

(6) Access the school profile report upon initial upload of the file. This report allows you to conduct a self-assessment of the data that will be submitted in the Final Data

Submission process to check for accuracy. Please review the tables in the report to ensure that the appropriate cohorts and data points were included. This report is not saved in the FADMS. If you would like to save a copy, please print the .pdf or save a copy to your computer.

d. Final Data Submission.

(1) Once the data file you have designated for final submission has been uploaded, click the "Final Data Submission" link in the "Account Links" box.

(2) By using the available pull-down menu, indicate the primary packaging methodology (federal, institutional or both) that was used by your institution to determine the financial aid awards for the students in the cohort requested.

(3) Provide the contact information for the individual who conducted the final submission of your institution's data file.

(4) Provide the contact information for the designated Primary Financial Aid contact for the institution (if different from the person conducting the final submission). This person will most likely be the Director of Financial Aid, but may have a different designation. This person may be the same person designated in step 3 above.

(5) Click "Submit Data". A message will appear confirming the receipt of your final data submission.

e. School Profile Reports.

(1) Interim School Profile Report.

(a) Once a data file has been successfully uploaded, click "Interim School Profile Report".

(b) Click "View Interim School Profile Report". An Adobe Acrobat document (.pdf) will be generated and appear in a new window. This document can be saved to your personal computer or printed.

(c) These reports can be generated as many times as you wish following a successful data file upload.

(d) These reports are strictly intended for institutional self-assessment and will never be used by the NCAA in the program's full review process.

(e) An Interim School Profile Report will not be generated for the Graduate/Post-Baccalaureate Transfer Student-Athlete Cohort.

(2) School Profile Report.

(a) Shortly following the final submission of the data file, you will be notified that the school profile report is available for download.

(b) Click “School Profile Report” in the “Reports” box.

(c) An Adobe Acrobat document (.pdf) will be generated and appear in a new window. This document can be saved to your personal computer or printed.

(d) The post-submission school profile report will be reviewed as part of the comprehensive Division III Financial Aid Annual Electronic Reporting Process.

(e) A School Profile Report WILL NOT be published for the Graduate/Post-Baccalaureate Transfer Student-Athlete Cohort.

APPENDIX 1

Order	Name	Format	Description	Validations	
				Undergraduate Cohort File	Graduate/Post-Baccalaureate Transfer Student-Athlete Cohort File
1.	ID	alpha-numeric	Provided by the institution.	≤ 10 numbers and/or letters no punctuation	≤ 10 numbers and/or letters no punctuation
2.	SPORT1	alpha	Official NCAA 3-letter sport code. This code will be confirmed against sports listed in membership database for the institution.	NCAA 3-letter sport code missing permitted	NCAA 3-letter sport code
3.	SPORT2	alpha	Same as above	Same as above	Same as above
4.	SPORT3	alpha	Same as above	Same as above	Same as above
5.	COA	numeric	Cost of Attendance	• ≥$1, ≤ $999,999 • no commas rounded to nearest dollar	• ≥$1, ≤ $999,999 • no commas rounded to nearest dollar
6.	EFC	numeric	Expected Family Contribution	• ≥$0, ≤ $999,999 • no commas rounded to nearest dollar • missing permitted	• ≥$0, ≤ $999,999 • no commas rounded to nearest dollar • missing permitted
7.	FN	numeric	Financial Need	• ≥$0, ≤ $999,999 • no commas rounded to nearest dollar	• ≥$0, ≤ $999,999 • no commas rounded to nearest dollar
8.	PELL	numeric	Federal Pell Grant	• ≥$0, ≤ $99,999 • no commas rounded to nearest dollar	= 0
9.	FSEOG	numeric	Federal Supplemental Educational Opportunity Grant	• ≥$0, ≤ $99,999 • no commas rounded to nearest dollar	= 0
10.	SGA	numeric	Total State gift aid	• ≥$0, ≤ $99,999 • no commas rounded to nearest dollar	• ≥$0, ≤ $99,999 • no commas rounded to nearest dollar
11.	IGA	numeric	Total Institutional gift aid (DO NOT include tuition remission, tuition exchange or similar employee benefits)	• ≥$0, ≤ $99,999 • no commas rounded to nearest dollar	• ≥$0, ≤ $99,999 • no commas rounded to nearest dollar
12.	POGA	numeric	Total Private/Outside gift aid	• ≥$0, ≤ $99,999 • no commas rounded to nearest dollar	• ≥$0, ≤ $99,999 • no commas rounded to nearest dollar
13.	OGA	numeric	Total Other gift aid (Include tuition remission, tuition exchange or similar employee benefits)	• ≥$0, ≤ $99,999 • no commas rounded to nearest dollar	• ≥$0, ≤ $99,999 • no commas rounded to nearest dollar
14.	WS	numeric	Was federal or state work study included in the financial aid award package accepted by the student?	1=Yes 2=No	= 2 (No)
15.	CEP	numeric	Was campus employment included in the financial aid award package accepted by the student?	1=Yes 2=No	= 2 (No)
16.	VERSION	numeric	This field is required to distinguish between the two required data files if two files are submitted. If the institution is submitting the Undergraduate Cohort file only, the Version field is not required.	= 0	= 1

APPENDIX 2

Undergraduate Cohort

1234567890			37725		0	0	0	0	6000	0	0	1	2	0
2345678901	WVB		37865	8600	29265	4000	2000	0	18600	0	0	2	2	0
3456789012			38815	4625	34190	1150	2000	0	26375	0	0	2	1	0
4567890123			38504	9935	28569	0	0	0	23904	2000	0	1	2	0
5678901234	MSO	MLA	37655	23194	14461	0	0	1686	3210	0	5400	1	2	0
6789012345	MFB		37655	38007	0	0	0	0	7500	0	0	2	2	0
7890123456			37725	9822	28903	0	0	500	24863	0	0	2	2	0
8901234567			37725	8311	29414	4000	0	0	19749	500	0	2	1	0
9012345678	WSB		38215	4780	33435	950	2000	0	24820	2000	0	1	2	0

Graduate/Post-Baccalaureate Transfer Student-Athlete Cohort File

2345678901	WVB		37865	8600	29265	0	0	0	18600	0	0	2	2	1
5678901234	MSO	MLA	37655	23194	14461	0	0	1686	3210	0	5400	2	2	1
6789012345	MFB		37655	38007	0	0	0	0	7500	0	0	2	2	1
9012345678	WSB		38215	4780	33435	0	0	0	24820	2000	0	2	2	1

APPENDIX 3

NCAA DIVISION III FINANCIAL AID REPORTING PROGRAM: POLICIES AND PROCEDURES WORKSHEET

This worksheet has been designed as a guide for the clear, complete, and concise compilation and presentation of the institution's policies and procedures for administering student financial aid as it relates to Division III financial aid bylaws. To ensure that all relevant information is included, it is important to involve all key personnel on campus when compiling the responses, including presidents and chancellors, and all those who hold leadership positions in financial aid, student recruitment, admissions, enrollment, and athletics.

If you have any questions, please contact Eric Hartung, Division III Financial Aid Committee Liaison, at (317) 917-6306 or ehartung@ncaa.org.

I. INSTITUTIONAL GIFT AID

Need-Based Awards

1. What methodology (federal, institutional, or both) is used to determine financial need for purposes of awarding need-based institutional gift aid?

2. Is there a policy directing the proportion of financial need that will be met by institutional gift aid?
3. What is that policy? In addressing this, please consider the following: 1) criteria beyond financial need that determines the proportion of financial need to be met by institutional gift aid (e.g., student type, demographics, academic rating, enrollment in targeted programs, residential status, etc.) and 2) a policy calling for differential need-based awarding based on the level of financial need (e.g., individuals with lower financial need have a higher proportion of their need met than do individuals with higher financial need).

Non-Need-Based Awards

1. Is non-need based aid awarded?

2. Compile a description, criteria and awarding policies for all non-need-based institutional gift aid awards available to full-time, first-time enrollees. This includes merit, leadership and all other scholarships awarded by admissions, financial aid or any other campus entity. Include criteria for endowed scholarship and grants, regardless of how those endowed grants are used in the awarding process. Compile blank copies of any ratings or evaluation forms used in the awarding process and any written policies that guide the individuals making these award decisions and any marketing materials related to these

awards. Ensure that the materials provided will allow for the understanding of how awards are made.

a. If the criteria for non-need based aid includes consideration of academic performance that will qualify the student for a set amount of aid, include a copy of the awarding grid used.

3. Is there an application process for the non-need-based awards?

   a. How is the process communicated to incoming and returning students?

   b. Include a copy of the application(s).

4. Who makes non-need based award decisions? (Please indicate all parties are responsible depending on the award. For example, faculty award department aid and admission awards merit aid, etc.)

   a. Whether it is the admission department, financial aid department or an awards committee comprised of individuals from various departments that determines the recipients and award amounts of non-need based aid, provide details of those policies and any documentation employed in the decision-making process (e.g., written rating instructions and blank rating forms).

   b. Are athletics personnel or individuals representing athletics (e.g., Board or Foundation members representing athletics interests) <u>currently involved</u> in the award decisions at any level (e.g., sit on an interview committee for an award)? Explain.

   c. Could athletics personnel or individuals representing athletics (e.g., Board or Foundation members representing athletics interests) <u>potentially be involved</u> in the award decisions at any level (e.g., sit on an interview committee for an award)? Explain.

5. Is participation in high school or college extra-curricular activities, whether as a stated criterion or as part of a list of acceptable activities, considered for any non-need-based awards?

   a. Is participation or ability in high school or college athletics included as a criterion or consideration in published financial aid materials?

   b. Is participation or ability in high school or college athletics considered in the award decision?

6. Are leadership positions held in high school or college extra-curricular activities, whether as a stated criterion or as part of a list of acceptable activities, considered for any non-need-based awards?
   a. Is team captain in high school or college athletics included as a criterion or consideration in published financial aid materials?

b. Is team captain in high school or college athletics considered an acceptable leadership position in the award decision?

II. SPECIAL STUDENT POPULATIONS

Student Sub-Populations

If your institution has different awarding policies for various sub-populations of students, describe those differences. Are student-athletes disproportionately represented in any of these groups in comparison to the proportion of student-athletes at the institution overall? If so, include the proportion of student-athletes and other students for each sub-population. The six sub-populations listed are examples of such groups. If there are others, include them in this section as well.

1. Transfers;

2. Residential and Commuter Students;

3. Geographic sub-populations (for example; in-state/out-of-state, specific cities)

4. International Students: If need-based institutional gift aid is awarded to international students, the procedure for determining the financial need must be included.

5. Non-Traditional Students;

6. First Generation and/or Ethnic Minority Students

III. OTHER POLICIES

Financial Aid Awarding Matrices

Does your institution use an awarding matrix, such as one developed with the help of an outside consultant where various need-based and non-need-based factors are accounted for in the determination of an award amount?

1. Include a copy of the matrix used for award level determinations.

2. Describe the process.

3. What factors are accounted for and how are they weighted in the matrix?

4. Is participation in extra-curricular activities in high school or college a factor in the matrix?

    a. Is athletics participation or ability in high school or college part of that factor?

5. Is leadership in high school or college activities a factor in the matrix?

    a. Is athletics leadership (e.g., team captain) part of that factor?

6. Does the matrix include a factor related to the desire of the student to attend the institution or the desire of the institution to enroll the student?

    a. Is athletics participation, ability or leadership part of that factor?

Targeted Awarding

Do your awarding policies target any individuals or specific groups of students?

1. Identify those individuals or groups and describe those policies here.

2. Are student-athletes disproportionately represented in any targeted group as compared to the proportion of student-athletes at the institution overall? If so, include the proportions of student-athletes and other students for each targeted group.

Financial Aid Award Appeals

Does your institution have a financial aid package appeals process?

1. Provide a description of the process and include any specific policies in place used to determine appeal outcomes and any award amount adjustments that result from an appeal approval.

2. Indicate how the process is communicated to students and the campus community.

3. Describe the role of advocates (e.g. families, coaches, teachers) in the process.

4. In the previously completed awarding cycle, how many appeals requests did you receive?

    a. How many were from student-athletes and in which sports?

5. In the previously completed awarding cycle, how many appeals requests did you grant?

    a. How many were for student-athletes and for which sports?

Tuition Remission/Exchange Programs

Does your institution have a tuition remission or exchange program?

1. Describe each program in detail.

2. How is the program communicated?

3. Is it a competitive program? If so, describe how.

4. What are the factors used to make the award decision for a competitive program?

5. Who is responsible for the award decision?

6. In the previously completed awarding cycle, how many tuition remission/exchange grants did you process?

    a. How many were for student-athletes and for which sports?

IV. ASSESSMENT OF POLICIES AND PROCEDURES

The Division III Financial Aid Committee believes self-assessment is a valuable process to assess compliance with Bylaw 15. Resources, such as "Staying Compliant with NCAA Division III Financial Aid Requirements," are available to provide guidance.

Does a representative(s) of the athletics department meet on a regular and periodic basis with the various campus constituents involved in the administration of student financial aid (e.g. enrollment, financial aid, admissions, development) to assess the institution's compliance with NCAA Division III Bylaw 15?

1. Who on your campus engages in the assessment? Which departments are represented? Who represents the various departments?

2. How often does your institution conduct this type of assessment?

3. Describe the content of this assessment. What are you assessing and how?

APPENDIX 4

NCAA Division III Financial Aid Reporting Program: Calculating and Interpreting the Variance Estimate

(Prepared by NCAA Research Staff – June 1, 2015)

Summary

A key piece of information used by member institutions and the NCAA Division III Financial Aid Committee in their assessment of compliance to NCAA financial aid bylaws is the variance estimate. The variance estimate is derived from a statistical model that tests for the dollar impact associated with being a student-athlete on the amount of institutional gift aid received, as compared to other students with similar financial need. Institutional gift aid refers to the institution's discretionary funds.

Formula for Calculating the Variance Estimate

A simple regression model is used where the independent variables are the dollar amount of financial need and student-athlete status (athlete vs. non-athlete). The dependent variable is the dollar amount of institutional gift aid.

Because the independent variable, institutional gift aid, is left-censored (e.g., the variable distribution looks truncated at an aid value of zero), a censored regression model is used to detect potential bias related to student-athlete status. To calculate the variance estimate, the Tobit regression model for limited dependent variables is used.

Variable Definitions

Variable Name	Description
Status (SA)	= 1 if individual is a student-athlete = 0 otherwise
Financial Need (FN)	= result of financial need calculation used by institution to determine financial aid award package
Institutional Gift Aid (IGA)	= total institutional gift aid included in the financial aid award package

The Tobit model is based on a person (n) at an institution (i):

$$\$IGA_{(n,i)} = \beta_0 + \beta_1 \ \$FN_{(n,i)} + \beta_2 \ SA_{(n,i)} + e_{(n,i)}$$

where $\$IGA > 0$,

β_0 = \$IGA when the \$FN=0 and the SA=0,

β_1 = increment in \$IGA for each \$1 in \$FN, controlling for student status

β_2 = increment in \$IGA if SA=1, controlling for financial need.

The variance estimate (β_2) is reported with 95 percent statistical confidence. Therefore, an upper and lower boundary of confidence is reported around that parameter estimate. The lower boundary represents the lowest estimate of bias in institutional gift aid for student-athletes at the institution and the higher boundary represents the highest estimate of bias in institutional gift aid for student-athletes at the institution. To calculate the variance estimate as a proportion, the estimate in dollars is divided by the average financial need of the student-athletes.

While the accuracy of the prediction may increase with the addition of independent variables, such as secondary school academic performance indicators, these variables are currently difficult to collect from institutions in a reliable and standardized fashion.

APPENDIX 5

Implementation of the Sport Filter

The "residual" from the overall Tobit regression model without the "athlete-status" coefficient is calculated for each individual record at the institution level. This capitalizes on the strength of the overall size of the dataset, and avoids the adverse effect of small sample size at the team level. The residual is the difference between the statistically predicted institutional gift aid award based on financial need and the actual institutional gift aid award. The residual is then standardized and the outliers identified for each institution. An individual is considered an outlier if s/he has a calculated residual that is two or more standard deviations above the mean for all students at the institution. At the institution-level, the student-athlete outlier cases are then grouped by sport. In other words, we have isolated all outliers at each institution, student-athletes and other students, and then, after removing the other students, have grouped the student-athletes by sport group.

We then determine whether there are sufficient student-athlete outliers to trigger further review. To enact this trigger, the following condition must be met.

Based on its overall cohort size, a team must meet a minimum threshold of outliers. A cut-point was determined by a combination of the number of outliers per sport group and the number of student-athletes in the overall sport group for each institution. This approach will allow for the identification of very small sport groups (i.e., two, three, or four) and very large ones (i.e., 20 or greater).

Overall Sport Group Size	Minimum Number of Outliers Required
1	Exempt
2	Exempt
3	2
4	2
5	2
6	2
7	2
8	2
9 and above	3