SECTION 1 - PERSONNEL
(Bylaw 11)
DESIGNATION OF COACHES AND STAFF, DECLARATION OF COACHING ACTIVITIES, DECLARATION OF RECRUITING ACTIVITIES, & VOLUNTEER COACHES PROCEDURE

Purpose: To determine the number and duties of the coaching staff and associated persons within each sports program to ensure compliance with NCAA regulations. In particular, to designate those that have coaching duties.

Responsibility: Head Coach(es), Athletics Compliance Office (ACO) and Athletic Department Human Resources (ADHR) Director of University Athletics Compliance Head Coaches New Staff Member

Procedure:

Any new staff member (coach, non-coaching staff member, volunteer or paid) shall meet with, and be approved by the athletics department HR person prior to commencing any duties. In addition, if the staff member is volunteer or part-time, he or she shall meet with the Athletics Compliance Office (ACO) for Orientation. If the new staff member is full-time, then he or she will meet with the ACO for orientation with the first two weeks or as soon as a recruiting calendar allows for coaching staff members.

DUE August 1 each year (or when a change in staff after that date)

1. Designation of Coaches & Staff Form
   a) By August 1 each year, the ACO will forward to all head coaches, a Designation of Coaches & Staff Form via JumpForward.
   b) Any person associated with the program should be reported on this form including compensated and non-compensated staff. In the sports of Basketball and Football, volunteer coaches are prohibited.
   c) Using the Designation of Coaches & Staff form, the head coach for each sport will list all individuals that will be working with his/her team. If a slot is filled with a person receiving a graduate assistantship as compensation, please note with a # against his or her name. If the person is not receiving any compensation, please note with a * against his or her name. Following its completion of the form the head coach should review and sign the document(s).
   d) Once the form is completed the ACO will review and approve the form via JumpForward.

2. Declaration of Coaching Activities Form
   a) Each head coach shall sign the Declaration of Coaching Activities Form to certify that ONLY the persons listed as coaches on the Designation of Coaches and Staff form are involved in any actual coaching activities, as outlined in the NCAA manual. This form should be submitted along with the Designation of Coaches and Staff form to the ACO by August 1 each year, and then up-dated immediately if there any changes.

3. Declaration of Recruiting Activities Form
   a) Each head coach shall also sign the Declaration of Recruiting Activities Form to certify that the coaching and non-coaching staff understands that all and any recruiting contacts and evaluation with prospective student-athlete and/or their parents or legal guardians shall be entered into the
JumpForward database either directly from their SmartPhone or manually if any other form of communication is used, i.e. Viber, Skype, etc.

3. Volunteer Coach Application (All-Sports except Basketball and Football)
   a) If the sport is employing the services of a volunteer assistant coach, the Volunteer Coach Application form should be completed, giving the anticipated start date, signed by the head coach and volunteer coach (sign at #1 only in the last box), and then forwarded to the ACO at the same time as the Designation of Coaches & Staff form.
   b) The ACO will review the documentation, and upon approval will then forward the document(s) to the Athletic Director (or their designee) for final approval. Upon final approval, the Athletics Office of Human Resources (AOHR) should distribute copies to the head coach, sport administrator, ACO, and the Office of Risk Management located on campus. The original documentation should be filed in the AOHR office.

Volunteer Coach Leaving
   • A departing volunteer coach should meet with the head coach and provide the date of separation, sign and date #2 in the last box on the original Volunteer Coach form, then must meet with AOHR.
   • The departing coach (paid or volunteer) should meet with the their supervisor and provide the date of separation in writing, then meet with the AOHR.
   • The coaching staff will inform the ACO that the coach is no longer employed by FIU, and provide a copy of the completed original Volunteer Coach Form, showing the separation date.
   • The ACO will remove the coach from access to the Jump Forward Compliance Solutions Database.

4. Non-Coaching Staff Members
   Any non-coaching staff member shall complete the Non-Coaching Staff Member Agreement and meet with the ACO prior to starting any duties.

5. If any changes occur during the year, it is the Head Coach’s responsibility to submit a new Designation of Coaches & Staff, Volunteer Coach Application and/or Volunteer Non-Coaching Staff Members(s) as soon as the change occurs, then for the procedure stated above.

6. New Staff Members
   a. A new coach cannot start his or her coaching duties until:
      • A background check has been completed by the ACO and HR;
      • The ACO has written confirmation that the coach has satisfactorily passed the NCAA Coaches Certification Exam;
      • The ACO has confirmation from HR that the coach has signed or accepted a contract or letter of employment from FIU; and
      • The ACO has confirmation from HR of the coach’s resignation and the effective date.
   b. Upon confirmation of the above mentioned, he or she may start their duties.
   c. The ACO will conduct a new coach Orientation Program.
   d. The ACO will add the new coach to the Jump Forward Compliance Solutions Database and arrange for training.
   e. All new employees, or volunteers, working with a sports program or unit MUST VISIT WITH THE ATHLETICS DEPARTMENT HR OFFICER AND THE ACO PRIOR TO STARTING HIS OR HER DUTIES.
Under NCAA Bylaw 11.7.4, there is a limit on the number of coaches & staff that may be employed by an institution in each sport. DUE AUGUST 1.

The sport of **SPORT** is allowed a total of 1 Head, ___ Assistant Coaches, and ___ Volunteer Coach. Please complete legible PRINT the information below regarding ALL your staff. *(Unpaid mark *. Paid as GA #)*

Head Coach: ________________________

Assistant Coaches: ________________________

________________________
________________________

Volunteer Coach: ________________________

GA Coach: Not permissible

Student Assistant Coach(es): ________________________

Manager(s): ________________________

Other Staff & Position(s): ________________________

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*Use the back if necessary*

I certify that the information provided above is complete and accurate. I also understand my obligation to comply with NCAA, Conference and FIU rules and regulations.

________________________
Head Coach Signature

________________________
Date

FOR ATHLETIC ADMINISTRATION USE ONLY

☐ Approved ☐ Not Approved

________________________
Athletic Compliance Office

________________________
Date

☐ Approved ☐ Not Approved

________________________
Athletic Director (or designee)

________________________
Date

(The individual sport forms are available on the Compliance Drive under Forms)
To each Head Coach: DUE AUGUST 1.

I understand that, in accordance with NCAA regulations, it is my responsibility to ensure that ONLY persons declared as a COACH may engage in ANY coaching activities, unless specifically legislated (e.g. manager may engage in very limited practice activities, such as passing a ball back, but CANNOT participate in full practice activities).

In addition, I understand that only the sport of Football can engage graduate assistant (GA) coaches. However, if a permissible coaching slot is open in my sport, it is permissible to compensate the assistant coach as a graduate assistant. In those circumstances the GA would be permitted to coach.

Finally, I understand that I must seek approval and declare ALL personnel that work with my program, on a paid or volunteer basis. The Athletics HR Administrator and Athletics Compliance should be notified of the hiring and the staff person must complete the orientation process PRIOR to him or her commencing their duties.

Head Coach: ______________________________ Sport: ________________________

Print Name     Print

Head Coach: ______________________________ Date: ________________________

Signature
DECLARATION OF RECRUITING ACTIVITIES

To each Head Coach:  DUE AUGUST 1.

I understand that, in accordance with NCAA regulations, it is my responsibility to ensure that ONLY persons declared as a COACH may engage in ANY recruiting activities, unless specifically legislated, and successfully pass the annual coaches recruiting test prior to August 1, in order to recruiting off-campus.

In addition, I understand that all recruiting contacts and evaluations made by the coaching and non-coaching staff with prospective student-athlete and/or their parents or legal guardians, shall be input into the JumpForward database either directly from the coaches SmartPhone or manually if any other form of communication is used, i.e. Viber, Skype, etc. that is not automatically entered into the JumpForward database.

Head Coach: ___________________________________  Sport: ________________________

Head Coach: ______________________________ Date: _________________

Head Coach: ______________________________ Date: _________________
Non-coaching staff members with sport-specific responsibilities (e.g., operations staff, video staff, etc.) may participate in activities involving only the coaching staff and may perform designated administrative duties (e.g., attend coaching staff meetings, analyze video of team and/or opponents, track statistics). However, such individuals are prohibited from participating in any coaching or other countable activities with student-athletes, including observing student-athletes engaging in voluntary activity. Non-coaching staff members are prohibited from engaging in any off-campus recruiting activities and may only participate in other recruiting activities (e.g., on-campus contact, communication) as NCAA legislation permits.

Please review the chart below regarding permissible and impermissible activities for sport-specific non-coaching staff members.

<table>
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<th>YOU MAY</th>
<th>YOU MAY NOT</th>
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<tr>
<td>Observe practice &amp; other organized activities (e.g. shoot-arounds, conditioning, skill instruction)</td>
<td>Engage in coaching or any other countable activities with student-athletes (e.g. shagging balls, assist in drills, signal plays)</td>
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<tr>
<td>Attend coaching/staff meetings</td>
<td>Engage in any off-campus recruiting activities</td>
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<tr>
<td>Analyze video of FIU team or opponent (this may only be done with staff, not student-athletes)</td>
<td>Scout opponents (other than via film review)</td>
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<tr>
<td>Track statistics during practice and/or competition</td>
<td>Evaluate prospective student-athletes (in-person or film)</td>
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<tr>
<td>Be on the sideline, sit on the bench, stand on deck, etc. during a contest, provided no coaching activities occur</td>
<td>Participate in any activities regarding the selection/recruitment of prospective student-athletes</td>
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<tr>
<td>Be involved in any organized activities that only involve the coaching staff (e.g., game planning)</td>
<td>Conduct, participate with, or observe student-athletes in your sport who are engaging in voluntary athletically related activities (e.g., you may not watch pick-up, 7-on-7 workouts, or voluntary weight-lifting/conditioning activities)</td>
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<tr>
<td>Develop/manage game and practice schedule</td>
<td>Engage in chalk talk or other strategic/coaching meetings with student-athletes</td>
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<tr>
<td>Coordinating filming, film exchange, editing game film/highlights</td>
<td>Officiate a FIU scrimmage/exhibition in your sport</td>
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<td>Initiate phone calls to a prospect during an official visit, including transit</td>
<td>Attend an athletics event involving prospects unless an immediate family member (e.g., child, sibling) is participating</td>
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<tr>
<td>Initiate phone calls/electronic communication to a prospect beginning the day after a prospect signs an NLI or makes a financial/housing deposit</td>
<td>Speak at banquets/meetings conducted for prospective student-athletes</td>
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<tr>
<td>Initiate phone calls/other correspondence to a prospect relating only to camp/clinic logistical issues (e.g., incomplete registration form, failed payment), provided no solicitation or recruitment of prospects occurs</td>
<td>Receive or initiate phone calls/electronic correspondence except as permitted by NCAA legislation (e.g., day after NLI/deposit, camp/clinic)</td>
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<tr>
<td>Perform administrative tasks (e.g., catalog film, assist in travel preparation, etc.)</td>
<td>Demonstrate skills, drills, or any other activity</td>
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By signing below, I acknowledge that I understand the principles and applications of this document and have been advised about and understand the provisions set forth under NCAA Bylaw 16.02.3 (extra benefits) and 10.1 & 10.3 (ethical conduct).

<table>
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<tr>
<th>Print Staff Member Name</th>
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<th>Staff Member Signature</th>
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<tbody>
<tr>
<td>Head Coach (or Designee) Signature</td>
<td>Date</td>
<td>ACO Signature</td>
<td>Date</td>
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VOLUNTEER COACH APPLICATION

Per NCAA Bylaw 11.01.5; and 11.7.4.2.3, there is a limited to ONE volunteer coach that may be utilized by an institution in sports, other than basketball and football. Basketball and football are prohibited from engaging a volunteer coach. (Exception - Track & Field may have two).

TO BE COMPLETED BY THE VOLUNTEER COACH:

Application (please print):

Sport: __________________ Name: __________________ SSN: ________________
Address: ____________________________________________________________________________
City: ______________________ State: __________________ Zip: ____________________________
Residence: __________________ Office: ______________ Cell: _______________
Automobile: Make: ________ Model: _______________ Year: ______ License: ______ State: ______

I, hereby, make application for designation as a Volunteer Coach in the sport indicated above. I understand that if I am accepted for this position, I will not be eligible to receive any compensation or remuneration of any sort, except those expenses directly related to coaching duties.

I further understand that as a Volunteer Coach, I shall not be authorized to recruit or scout off-campus. Also, I will abide by all NCAA, Sun Belt, and FIU rules and regulations, specifically NCAA Bylaw 11.01.5 (below), which pertains to volunteer coaches.

In sports other than football and basketball, a volunteer coach is any coach who does not receive compensation or remuneration from the institution’s athletics department or any organization funded in whole or in part by the athletics department or that is involved primarily in the promotion of the institution’s athletics program, (e.g., booster club, athletics foundation association).

The following provisions shall apply:

(a) The individual is prohibited from contacting and evaluating prospective student-athletes off campus or from scouting opponents off campus.

(b) The individual may receive a maximum of two complimentary tickets to home athletics contests in the coach’s sport.

(c) The individual may receive complimentary meals incidental to organized team activities (e.g., pre- or postgame meals, occasional meals, but not training table meals) or meals provided during a prospect’s official visit, provided the volunteer coach actually dines with the prospect.

I recognize that the restrictions indicated above are imposed by the NCAA and that violation of any of these restrictions shall be treated as a violation of NCAA rules and regulations, which may result in sanctions being imposed against the athletic program and Florida International University, and termination of my position as a Volunteer Coach.

Furthermore, by signing this form, I acknowledge that I understand and will comply with the statements listed below during my involvement with the Florida International University Athletics Department as a volunteer coach.

Please initial each of the following items:

______ I understand that I can work for FIU outside the athletic department provided that the compensation that I receive for those duties is commensurate with that received by others performing those same or similar assignments; the time devoted to those duties is consistent with the time devoted by others receiving commensurate compensation for the same or similar assignments; and I am qualified for and am performing the duties for which I am compensated.
I understand that if I coach prospect-age individuals in a local club, they must reside within a 50 mile radius of FIU, and that I may not act as a recruiter for FIU with these individuals.

I understand that I may receive complimentary meals incidental to organized team activities (e.g., pre or postgame meals, occasional meals), but am not permitted to receive training table meals. I may receive meals associated with during a prospective student-athlete’s official visit.

I understand that the only expenses for which I may be reimbursed are for room, board and transportation costs incurred during travel to away competitions and parking expenses associated with practice and competition. However, I also understand that although these expenses may be reimbursable, any decisions on reimbursement will be made by the head coach to whom I report.

I understand that I may not receive complimentary tickets to any home athletics contest other than the sport I coach. I may receive, however, two complimentary tickets to home athletics contests in the sport I coach.

I understand that I am not covered by FIU medical coverage for any injury sustained in the workplace. The only medical coverage is the accident injury policy that covers field trips. However, this coverage is secondary to any personal medical insurance I carry.

I recognize that the restrictions indicated above are imposed by the NCAA and that violation of any of these restrictions shall be treated as a violation of NCAA rules and regulations, which may result in sanctions being imposed against the athletic program and Florida International University, and termination of my position as a Volunteer Coach.

The Volunteer Coach’s duties will be as follows: -- **Check all duties that are applicable**

- Recruiting (duties could include official visits, unofficial visits, phone calls, correspondence, etc.)
- Practice
- Home Competition
- Away Competition (duties could include van driving)
- Team Functions
- Other (describe)

**VOLUNTEER COACH’S ACCEPTANCE**

I certify that the information provided above is complete and accurate. I also understand my obligation to comply with NCAA, Sun Belt and FIU rules and regulations.

Volunteer Coach Signature: ______________________________________________ Date: ________________________________

**TO BE COMPLETED BY HEAD COACH: (Then forwarded to the Athletics Compliance Office)**

I, _____________________________, head coach for __________________________ hereby accept the services of the individual above as a Volunteer Coach and accept the responsibility for assuring compliance with the restrictions cited.

This appointment is not finalized until approved by the Athletic Director (or designee).

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<th>#1 Anticipated Start Date:</th>
<th>#2 Leave date:</th>
<th>Vol. Coach’s Signature/ &amp; date upon leaving</th>
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**FOR ATHLETIC ADMINISTRATION USE ONLY**

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OUTSIDE INCOME PROCEDURE

Purpose: This system aids in monitoring the athletically related income and benefits from sources outside FIU for all athletics department full/part time staff and coaches (excluding secretarial or clerical personnel).

Responsibility: Athletics Compliance Office (ACO)
Office of the President
General Counsel
Athletics Department Human Resources (ADHR)
Head Coaches
Assistant Coaches
Athletics Department Staff

Procedure:

DUE September 14

1. The ACO will distribute to all full/part time, athletics department staff members the FIU Outside Income Disclosure form during the August or September All-Staff meeting.
2. All staff members shall complete the disclosure, even if there is nothing to report, but if you have something to report include the amount and source of the income or benefit, then return it to the ACO by September 14 each year. Failure to do so will result in a violation of NCAA rules.
3. The ACO will record the receipt of all athletically related income forms.
4. The ACO will then forward the form to the Athletic Director for review.
5. Once the Athletic Director has reviewed the forms, they will be forward to the University President for review and approval by September 28.
6. Once reviewed and approved by the University President, the form(s) will be returned to the ACO, copied and distributed to the staff member(s). ACO will retain a copy and the original will be filed in the ADHR.
7. Any form that is in dispute will be dealt with on a case-by-case basis by the Athletics Director.

DUE September 28

All staff member shall also complete the required FIU on-line form, “Outside Activity/Conflict of Interest” via the Electronic Reporting System by going to OA/COI Electronic Reporting System webpage that contains the OA/COI forms as well as training material that explain how the portal works. If you experience technical questions call HR at (305) 348-2181.
OUTSIDE INCOME DISCLOSURE

Outsiders' Incomes Disclosure: Per NCAA Bylaw 11.2.2, all full/part time athletics department staff members shall provide annually a detailed written account of all athletically related income, and benefits received from sources outside the institution. This is then reported to the President through the Athletics Director. In addition, this approval shall be consistent with the institution’s policy for all other FIU employees. (See FIU/State Policy regarding outside income/conflict of interest).

If you have met one of the three conditions below in the past academic year, please indicate the source of your outside income, and the actual income earned:
1. **RECEIVED** athletically related income and benefits from sources outside the institution.
2. **USED** directly or by implication the institution’s name or logo in the endorsement of commercial products or services for personal gain.
3. **ACCEPTED** outside compensation or gratuities from athletics shoe, apparel or equipment manufacturers in exchange for use of such merchandise during practice or competition.

☐ Check here if no outside income was earned for the previous academic year. Sign the bottom of this document, and return it to the Athletic Compliance Office (ACO).

Sources of such income shall include, but are not limited to, the following:

- Income from annuities; $ ___________
- Sports Camps, Clinics and/or Tournaments $ ___________
- Housing benefits (incl. preferential housing arrangements) $ ___________
- Country-club membership $ ___________
- Complimentary ticket sales $ ___________
- Speaking engagements $ ___________
- Salary supplement (from outside the athletic department) $ ___________
- Endorsement or consultation contracts
  a. Athletic shoes $ ___________
  b. Apparel $ ___________
  c. Equipment $ ___________
- Television appearances or commercials $ ___________
- Radio appearances or commercials $ ___________
- Income from corporations in exchange for charitable work $ ___________
- Other (as a result of being an FIU Athletics Dept. Staff member) $ ___________

I hereby certify that I am in compliance with all NCAA, conference and institution regulations governing outside income. I will notify the Athletic Director of any new information or sources of income that may affect this agreement. THIS FORM WILL BE COMPLETED AND RETURNED TO ACO BY SEPTEMBER 14 EACH YEAR. (Due at the President’s office by September 28.)

Print Name: _______________________________ Title: _______________________________
Signature: _______________________________ Date: _______________________________

FOR ADMINISTRATIVE USE ONLY

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GUIDELINES FOR COMPLETING OUTSIDE ACTIVITY AND CONFLICT OF INTEREST
REPORT FORM FOR OUT-OF-UNIT FACULTY, ADMINISTRATIVE & STAFF

General Remarks

Faculty, administrators and staff members may engage in outside activities which provide
service to the community and increase professional reputations or increase/supplement income.
An employee who proposes to engage in any outside activity, as listed in the Reporting
Guidelines below, shall report to the employee’s supervisor, on this form, the details of such
proposed activity prior to engaging therein. The administration is responsible for reviewing each
disclosure to determine if the activity constitutes a conflict or potential conflict of interest, or
if there are conditions necessary to manage, reduce or eliminate the conflict or potential conflict.
In the event the proposed outside activity is determined to constitute a conflict of interest, and
the employee disagrees with that determination, the employee may have the matter reviewed by
the Provost or the Vice President for Human Resources, as appropriate.

An annual report should be submitted at the beginning of each academic year, or at such
time as there is a significant change in activity (nature, extent, funding, etc.) or when a
new outside activity is undertaken. This reporting provision shall apply to activities performed
while an employee is in pay status, or is on an approved leave, including a professional
development leave, but shall not apply to activities performed wholly during a period in which the
employee has no appointment with the University. The employee should still be aware of the
conflict of interest considerations that may arise from the latter activities.

An employee’s failure to report outside activities and conflicts of interest under the University's
policy or to follow any conditions imposed pursuant to the University's review of such activities
or conflicts may be grounds for disciplinary action.

Reporting Requirements

You must report the following outside activities and conflicts of interest prior to engaging in the
activity:

a. ALL compensated professional activities, including teaching for another institution.

b. Outside activities in which you use, incidentally, University facilities, equipment, and/or
   services.

c. Outside activities in which you directly or indirectly supervise a student or other employee
   with whom you also have a supervisory relationship at the University.

d. Outside activities in which you, your spouse, or child own, or have a material interest
   (greater than 5% ownership interest) in a business which seeks to do or does business with
   the University and you have the ability or authority to recommend, select, purchase or
   contract for the same kind of goods or services offered by this business.
e. You, your spouse or child own or have a material interest (greater than 5% ownership interest) in a business which competes with the University.

f. You are a candidate for, or holder of, public office.

g. You require or recommend the purchase and use of books, supplies, equipment, or other instructional resources created or published by you or by an entity in which you have a financial interest.

h. You are engaged in business activities, including service on the board of directors, or other management interest with regard to a business entity in the same discipline or field in which you are employed at this University.

i. You are engaged in any employment, contractual relationship, or have financial interests which might create a continuing or recurring conflict between your private interests and the performance of your public responsibilities and obligations here at the University, including time-commitments. This includes any outside activity in which there is assignment of your rights to intellectual property.

j. All financial, fiduciary, time-commitment and related interests that present or may appear to present a conflict of interest on research projects, whether externally funded or not, must be disclosed to the University immediately by the employee. This includes any interest of the employee or of the employee’s spouse or dependent children. See the Conflict of Interest in Research policy #2370.005 at http://policies.fiu.edu/files/572.pdf for more detail.

k. Any other outside professional activity which you should reasonably conclude may create a conflict of interest, including a conflict of time-commitment.

**Affirmation:** The signature on the Outside Activity and Conflict of Interest Report affirms an understanding of compliance with the University’s policy on outside activities and conflicts of interest as well as the completeness and accuracy of the responses. Information on the University’s policies and procedures on outside activities and conflicts of interest may be obtained from your administrative unit or on the University Policies and Procedures Library at http://policies.fiu.edu.

**Due October 28 each year.**

Revised October 2010
FOOTBALL – FALL EVALUATION EXCEPTION
PROCEDURE

Purpose: This is the formal declaration of the fall exception for football only that permits ten (10) coaches to be on the road recruiting at one time for a seven (7) consecutive days period.

Responsibility: Athletics Compliance Office (ACO)
Head Football Coach
Director of Football Operations

Procedure:

DUE Prior to the first Game:

1. The Head Football Coach and the Director of Football Operations shall complete the required Contact and Evaluation Exception Form declaring the week (seven consecutive days) when no FIU regular season game is not scheduled.
2. The form shall then be filed in the ACO as a PDF on the “Compliance Drive”; Recruiting as YEAR; FB Contact & Evaluation Fall Exception; DATE.

See Section 3 – Recruiting Logs
Per NCAA Bylaw 11.7.2.2.1, the institution shall declare the week in which it will utilize this exception and submit the declaration prior to its first regular-season contest.

### 11.7.2.2.1 - Exception -- Fall Evaluation Period.

Ten coaches (including the head coach) may evaluate prospective student-athletes at any one time during one week (any seven consecutive days) of the fall evaluation period in which no regular-season competition is scheduled. Before its first regular-season contest, the institution shall declare, in writing, the week in which it will use this exception. The selected week shall not be revised after the declaration deadline. The institution shall submit the declaration to its conference office. An independent institution shall keep the declaration on file in the office of the athletics director.

### Declaration of Week:

Date: _____________________________ TO Date: ______________________________

### No regular-season competition is scheduled between:

Date: _____________________________ TO Date: ______________________________

_______________________________________________ _______________________
Signature of Head Coach Date

_______________________________________________ _______________________
Signature of Compliance Director Date