



**TEXAS**

The University of Texas at Austin

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**NCAA Bylaw 13**  
**Recruiting**  
*Intercollegiate Athletics*

***December 2025***

**Audit & Advisory Services**  
*UT Austin's Agents of Change*



## Executive Summary

### NCAA Bylaw 13—Recruiting Intercollegiate Athletics Project Number: AUS26ASCF0862

#### Audit Objective

The objective of this audit was to determine whether the Intercollegiate Athletics (Athletics) compliance program provides reasonable assurance that prospective student-athlete official visits and transfer student-athlete recruiting practices comply with National Collegiate Athletics Association (NCAA) Bylaw 13 and institutional policies.

#### Conclusion

Athletics maintains a strong compliance framework, and the compliance program provides reasonable assurance that recruiting activities for prospective and transfer student-athletes comply with NCAA Bylaw 13. However, there are opportunities to evaluate processes to reduce inefficiencies and enhance official visit documentation and expense reporting practices.

#### Audit Observations<sup>1</sup>

Recommendation	Risk Level	Estimated Implementation Date
Official Visit Documentation and Expense Reporting	Medium	September 2026

#### Engagement Team

Jason Boone, CFE, Auditor  
Anthony Orange, Auditor  
Melanie Tolen, CPA, Senior Auditor

<sup>1</sup> Each observation has been ranked according to The University of Texas System Administration (UT System) Audit Risk Ranking guidelines. Please see the last page of the report for ranking definitions.



## Detailed Audit Results

### Observation #1 Official Visit Documentation and Expense Reporting

Athletics does not consistently follow its on-campus pre-visit documentation procedures. In some cases, required documentation is incomplete, inaccurate, or documented approvals occurred outside the compliance software. Additionally, sport program staff reporting of official visit expenses in Concur varies resulting in inconsistent classification and documentation of expenses. This requires the Athletics Risk Management and Compliance Services (Compliance) staff to manually search Concur expense reports for supporting documentation, increasing administrative burden and the risk of inaccurate reporting or inability to verify compliance with NCAA Bylaw 13.

**Management’s Corrective Action Plan:** Compliance staff will evaluate current official visit procedures to identify avenues to reduce inefficiencies and enhance official visit documentation and expense reporting practices while also monitoring potential legislative deregulation in this area given current shifts to the intercollegiate model. Compliance will ultimately modify its written procedures to reflect any necessary modifications.

**Responsible Person:** Assistant Athletics Director, Compliance

**Planned Implementation Date:** September 1, 2026

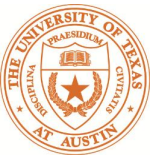
## Additional Risk Considerations

### Official Visit Policy Review

Athletics engaged in an external review of its official visit policies that was in a report dated October 2020. The NCAA Bylaw 13.6.1 requires an external review of official visit policies at least once every four years, and the Southeastern Conference (SEC) interprets this requirement as a “four-year cycle” and not a specified interval. Based on the SEC interpretation, Athletics remains compliant until the end of fiscal year 2028; however, the dynamic nature of NCAA landscape suggests that Athletics could benefit from proactively pursuing more frequent external reviews of their policies. These reviews would not only strengthen institutional integrity but could position Athletics to adapt swiftly to evolving standards and best practices in collegiate recruiting.

### Transfer Rules Training Improvements

In 2024, the NCAA implemented significant updates to Division I transfer rules, most notably allowing student-athletes immediate eligibility, regardless of the number of previous transfers. Additionally, the transfer notification windows were shortened across several sports. Compliance has routinely educated Athletics staff as rules have changed; however, documented training materials and policies and procedures include limited information that specifically addresses transfer recruitment and rules. Athletics should consider revising the current training materials and documented policies and procedures to more directly address increased transfer activity and the updated transfer-related rules and requirements.



## Conclusion

Athletics maintains a strong compliance framework, and the compliance program provides reasonable assurance that recruiting activities for prospective and transfer student-athletes comply with NCAA Bylaw 13. However, there are opportunities to evaluate processes to reduce inefficiencies and enhance official visit documentation and expense reporting practices.

## Background

NCAA Bylaw 13 governs the recruiting of prospective and transfer student-athletes, establishing standards to ensure fairness, integrity, and institutional control. The bylaw defines permissible recruiting contacts, communications, and visits, and it outlines rules for evaluations, offers, and recruiting materials. Athletics’ Compliance team oversees recruiting compliance through interpreting legislation, educating coaches and staff, monitoring recruiting activity, and investigating potential violations.

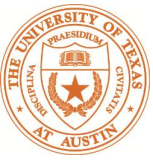
## Scope, Objectives, and Methodology

This audit was conducted in conformance with The Institute of Internal Auditors’ Global Internal Audit Standards. Additionally, we conducted the audit in accordance with Generally Accepted Government Auditing Standards and meet the independence requirements for internal auditors. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions on our audit objectives.

The scope of this review includes current processes, procedures, and controls. Specific testing data was reviewed for academic year 2024-2025.

**Table: Objectives, Methodology and Controls Assessment**

Audit Objective	Methodology	Controls Assessment
Determine whether the Athletics compliance program provides reasonable assurance that prospective student-athlete official visits and transfer student-athlete recruiting practices comply with NCAA Bylaw 13 and institutional policies	<ul style="list-style-type: none"> <li>• Reviewed official visit procedures and related controls.</li> <li>• Tested a sample of official visits for appropriate documentation and expenses.</li> <li>• Evaluated educational materials and records related to official visit and NCAA transfer regulations.</li> <li>• Reviewed prior external assessment of official visit policies.</li> <li>• Evaluated access controls for the NCAA transfer portal.</li> </ul>	Effective with Medium Risk Opportunities



## Criteria

- NCAA Bylaw 13.6, Recruiting
- Intercollegiate Athletics: On-Campus Visit, Policy and Procedure, RMCS-3410

## Observation Risk Ranking

Audit observations are ranked according to the following definitions, consistent with UT System Audit Office guidance.

Risk Level	Definition
Priority	If not addressed immediately, has a high probability to directly impact achievement of a strategic or important operational objective of The University of Texas at Austin (UT Austin) or the UT System as a whole.
High	Considered to have a medium to high probability of adverse effects to UT Austin either as a whole or to a significant college, school, or unit.
Medium	Considered to have a low to medium probability of adverse effects to UT Austin either as a whole or to a college, school, or unit.
Low	Considered to have minimal probability of adverse effects to UT Austin either as a whole or to a college, school, or unit.

In accordance with directives from UT System Board of Regents, Audit & Advisory Services will perform follow-up procedures to confirm that audit recommendations have been implemented.

## Report Submission

We appreciate the courtesies and cooperation extended throughout the audit.

Respectfully Submitted,

Sandy Jansen, CIA, CCSA, CRMA, Chief Audit Executive

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**AUDIT & ADVISORY SERVICES: NCAA BYLAW 13—RECRUITING**

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