

MEMORANDUM

TO: Division I Institutions & Conferences
FROM: College Sports Commission
DATE: June 23, 2026
RE: Update on NIL Deal Review and Agent Agreements

The College Sports Commission (“CSC”) is writing to provide the following information related to an updated enforcement policy, continued refinement of the range-of-compensation model, and consulting agreements between institutions and player agents.

I. Updated Enforcement Policy

As a reminder, in order to determine whether a payment is at rates and terms commensurate with similarly situated individuals as required by NCAA Bylaw 22.1.3, the CSC uses a model, developed in partnership with Deloitte, that evaluates whether a deal’s compensation exceeds a range of compensation (“RoC”) of similarly situated individuals based on multiple factors that are organized into three pillars reflecting institution market reach, social media reach, and student-athlete performance. If a deal’s compensation is within the RoC of at least one pillar, the CSC determines that a particular deal is commensurate with rates and terms of similarly situated individuals. Otherwise, the CSC will conduct additional holistic tests that provide additional opportunities for a deal to be considered at rates and terms commensurate with similarly situated individuals.

The Board of Managers of the CSC recently approved a new enforcement policy for the coming academic year, to take effect July 1, 2026, whereby the CSC will not subject deals valued between \$600-\$15,000 to RoC review unless and until a student-athlete has exceeded \$50,000 in Associated deals in an academic year. This updates the prior policy, in effect since April 2026, that exempted deals up to \$2,500 from RoC review unless and until a student-athlete reached \$15,000 in Associated deals. The policy change is intended to allow the CSC to continue to focus its resources in NIL Go on higher-dollar deals. All Associated deals still must be “for a valid business purpose related to the promotion or endorsement of goods or services provided to the general public for profit.” *See* NCAA Bylaw 22.1.3.

By way of example, assume a student-athlete submits three Associated deals in July 2026: one for \$10,000, one for \$15,000, and one for \$20,000. The first two of these deals – for \$10,000 and \$15,000 – will not be subject to RoC review. The third of these deals – for \$20,000 – will be subject to RoC review. After submission of those three deals, the student-athlete’s aggregate (i.e., total) Associated deal compensation stands at \$45,000. If the next Associated deal submitted by the student-athlete is \$5,000 or less, it will not be subject to RoC review. But if instead the next Associated deal submitted exceeds \$5,000, the deal will be subject to RoC review because the

student-athlete has now, via this fourth deal, exceeded \$50,000 in Associated deals in the academic year.

II. Continued Refinement of RoC Model

The CSC, working with Deloitte, periodically updates the RoC model to ensure it accurately reflects the current market, including to account for new data that is available based on Non-Associated deals that are submitted and cleared. The process of adding new data points, referred to as “batching,” occurs on a routine basis, approximately quarterly.

The CSC Board recently approved another update to further refine the RoC model. Beginning in early July, the model will use prediction intervals rather than confidence intervals. This methodological change has been contemplated since the launch of NIL Go, and sufficient data now exists in the model to evolve as planned. Prediction intervals account for the natural variability in how similarly situated student athletes are compensated, making them well-suited for evaluating whether a single deal falls within the range of what comparable individuals receive.

Until this methodological change is implemented, the CSC will postpone taking action on Associated deals that involve compensation above the current upper bound of the RoC but are close enough that they could fall within the range once the model is updated, in the interest of giving student-athletes the most generous possible evaluation of their deals. We do not anticipate this to cause significant delays, but we appreciate your patience while we make this update. The CSC will not postpone clearing deals that are currently within the RoC and otherwise comply with the rules.

III. Consulting Agreements Between Institutions and Player Agents

The CSC has received reports that player agents or other individuals representing student-athletes are seeking compensation from schools through NIL “consulting” agreements. These individuals are allegedly using the agreements to (1) route funds from the institution to their student-athlete clients and/or (2) supplement or replace representation fees otherwise owed by the student-athlete to the agent. In some reported instances, the agents are not informing their student-athletes that they are seeking such compensation from the institutions.

Financial agreements between agents and institutions may directly violate NCAA bylaws. *See* Bylaw 13.2.1. The agreements also present serious concerns about cap circumvention and the accuracy and timeliness of institutions’ reporting of benefits provided to student-athletes. Accordingly, upon learning of an institution-agent financial agreement, the CSC will review the agreement to determine if it violates the rules, regardless of whether an agent is also being paid directly by a student-athlete for his or her representation. Similarly, the CSC is investigating reports that entities affiliated with institutions, such as collectives, are paying representation fees to agents on behalf of student-athletes in order to circumvent the cap.

Anyone with information about potential violations of these or other rules is encouraged to contact the CSC directly or via our [anonymous reporting channel](#). Institutions must timely self-report any violation of the above-listed rules.