

MEMORANDUM

TO: Division I Institutions & Conferences

FROM: College Sports Commission

DATE: August 20, 2026

RE: Guidance on Inquiries and Investigations

This memorandum provides general information about inquiries and investigations conducted by the College Sports Commission's Department of Investigations ("DOI"). In recent months, the DOI has contacted many institutions, student-athletes, and third-party entities to gather information, assess the credibility of leads, and identify potential rules violations related to name, image, and likeness ("NIL") agreements, revenue sharing, and roster limits.

I. DOI Staffing

The DOI is comprised of individuals with backgrounds in law, investigations, compliance, and analysis. Several members of the team are former Division I athletes, who are familiar with the challenge of balancing high-level competition with the responsibilities of being a full-time student.

II. Routine Inquiries

In routine cases involving (1) unreported NIL deals, (2) unfulfilled NIL deal obligations, and (3) the return of compensation for NIL deals not cleared after review via NIL Go, the DOI team regularly sends inquiry forms to student-athletes through their institutions' compliance departments. In general, institutions' compliance departments have been prompt and responsive when gathering information from student-athletes. The DOI sincerely appreciates this collaboration and the positive relationships it is building with institutional partners.

As a result of this outreach, the DOI has discovered that some student-athletes failed to timely report NIL deals and others failed to return payment for deals later denied after review in NIL Go. The DOI issued warning letters to many of these student-athletes after they remedied noncompliance with applicable rules, and the DOI is still looking into some of the deals.

III. Investigative Approach

In addition to the routine inquiries described above, the DOI independently initiates and advances more complex investigations. In some matters, the DOI requests documents and conducts interviews of institutional representatives, student-athletes, and other relevant witnesses, as appropriate. The DOI also requests interviews to collect background information related to witnesses' former institutions, declined recruitment offers, and NIL-related business proposals.

Document requests and interviews are tools employed throughout an investigation to assess potential violations. They do not mean that the DOI has concluded that a rules violation occurred

nor necessarily indicate that the investigation is near completion. The team conducts interviews to better develop facts and information. These requests should not be viewed as unusual nor given undue import. The DOI expects and appreciates prompt cooperation when requesting interviews or the production of records consistent with the CSC's cooperation policy and NCAA bylaws.

The CSC's investigative processes may differ from institutions' prior experience with the NCAA's Enforcement Staff. The CSC generally does not ask institutions to conduct their own investigations of potential rules violations.

IV. Investigations Involving Institutions and Cap Evasion Schemes

The DOI is actively conducting multiple, longer-term investigations into potential cap evasion and NIL-related violations by institutions, student-athletes, and certain third parties. The CSC encourages anyone with relevant information to contact the DOI. Input from athletic department staff on recruiting practices, agent conduct, and questionable business proposals helps the CSC apply the rules fairly by bringing potential violations to light. Information may be provided anonymously, if desired, through the CSC's [website](#).