Framing Student-Athlete Compensation: A Thematic Analysis of California Senate Bill 206

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ACADEMIC ABSTRACT

The National Collegiate Athletic Association (NCAA) has controlled intercollegiate sports for the past 150 years, but the passing of California Senate Bill 206 on September 30, 2019, placed that power at risk. The bill will allow student-athletes to receive compensation for their name, image and likeness in the state of California, and has influenced other states to bring forth legislation of their own. The NCAA announced on October 29, 2019, that it would change its policies and bylaws to allow student-athletes to profit from their name, image and likeness. This qualitative thematic analysis seeks to discover how the issue of student-athletes in the case of SB 206 was framed by the media before and after the bill was passed, and after the NCAA announced its policy change. From the analysis, three themes emerged to support student-athlete compensation, eight themes emerged in opposition, and 24 sub themes emerged for both sides. Anti-compensation framing strategies prevailed throughout news coverage before and after SB 206 passed, and after the NCAA changed its policy. Local and mainstream news outlets and sports and mainstream news outlets all presented the eight themes.
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GENERAL AUDIENCE ABSTRACT

The National Collegiate Athletic Association (NCAA) has controlled college sports for the past 150 years, but the passing of California Senate Bill 206 on September 30, 2019, placed that power at risk. The bill will allow student-athletes to receive compensation for their name, image and likeness in the state of California, and has influenced other states to bring forth legislation of their own. On October 29, 2019 the NCAA announced that it would change its policies and bylaws to allow student-athletes to profit from their name, image and likeness. This thesis uses a qualitative thematic analysis, meaning that news articles are examined by the researcher to understand common themes that emerge about how the issue of student-athlete in the case of SB 206 was portrayed by the media before and after the bill was passed, and after the NCAA changed its policy. From the analysis, three themes were found to support student-athlete compensation, eight themes were found in opposition, and 24 sub themes were found for both sides. Anti-compensation framing strategies dominated news coverage before and after SB 206 passed, and after the NCAA changed its policy even though the public opinion supported student-athlete compensation.
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Chapter 1: Introduction

For more than 150 years universities and colleges have had organized sports; however, rules and structures that protected the athletes were not put into place until 1906 by President Roosevelt (Gruna, 2017). The National Collegiate Athletic Association (NCAA), first known as the Intercollegiate Athletic Association, helped maintain rules and safety for these student-athletes without the involvement of the institutions. The NCAA still presides over collegiate sports today and up until recently required student-athletes be considered amateurs, though they could receive funding from their institutions for the cost of attendance. Student-athletes were unable to receive compensation due to their amateur status even though institutions and organization like the NCAA profited from them, which sparked a national debate.

The future of collegiate sports has been changing with the increased conflict and contention regarding the regulations in which student-athletes are held to by the NCAA. Duke University freshman basketball player Zion Williamson, whom many are calling the next Lebron James or Michael Jordan, took the NCAA 2019 March Madness tournament by storm (Engle, 2019). But before he could take to the court in the beginning rounds of the tournament, Williamson sustained an injury during a regular season game that would not only bring about many worries about the rest of the team’s season, but also reinvigorate an age-old debate within the NCAA: given the amount of revenue college sports generate for the NCAA and universities, should college athletes be paid? Williamson is just one of many individuals who are speaking out about this issue; the debate includes current NCAA athletes, former NCAA athletes, professional athletes, and journalists who are calling for change of the amateurism rule (Johnson, 2019).

On one side is the argument that it would be inconceivable to expect Williamson, and other college athletes, to risk enduring another injury and jeopardizing their future basketball
career “in an unjust system that doesn’t allow him to be compensated” when the Duke freshman could easily enter the NBA draft as soon as he becomes eligible (Engle, 2019, para. 13). Even though Duke basketball reportedly has million-dollar apparel deals with brands such as Nike, and some tickets have been sold for over two-thousand dollars on the secondary market, Williamson and his other teammates, like many college athletes in the U.S., are not paid any of the money earned by the university. On the other hand, like other U.S. college athletes, Williamson received a scholarship and received a stipend for the other costs of attending and playing for Duke University (Engle, 2019). Currently college athletes receive benefits in financial assistance; wellness and insurance, which includes categories such as scholarships, funds for essential needs; additional money for cost of attendance; unlimited meals and an individual insurance policy (“How We Support College Athletes,” n.d.). The NCAA recently announced a change in its own policies that will allow athletes to profit from their name, image and likeness, which was previously against the bylaws and policies that the NCAA enforced (“Board of Governors,” 2019) but is strongly influenced by legislation that has been brought forth from various states.

Legislation pertaining to student-athlete compensation has been issued by various U.S. states to take action against the NCAA regarding the issue of student-athlete compensation. Bills like California Senate Bill 206 and Washington House Bill 1084 have received overwhelming support from the public, and have since influenced other states to bring forth their own legislation. Because so much is at stake, it stands to reason that this debate has many emboldened proponents on either side, thus paving the way for a number of different portrayals by the media, which may subsequently influence public opinion and challenge the NCAA’s authority.

**Washington House Bill 1084**
Initial calls for legislation on the issue originated in the state of Washington, where House Bill 1084 was put forward concerning the unfair practices involving compensation of athletes in higher education (HB 1084 - 2019-20, 2019). In January 2019, the bill was filed for introduction, then a public hearing was held twenty days later in the House Committee of College & Workplace Development. HB 1084 was the first bill to take action against the NCAA in recent years that has received overwhelming support. Drew Stokesbary, the state representative sponsoring this bill, hoped to help student-athletes receive some of the $8 billion dollars that they generate in revenue for the NCAA. Stokesbary understands that the universities are stuck in a tricky situation, where aiding the athletes can result in forfeiting games and titles, and take away university recognition that is gained from successful athletic programs (Stone, 2019). If the bill would be passed, it would allow college athletes to have an agent and be compensated for the services they provide, though Stone (2019) says it is unlikely to happen. Because of the support it received and attention it garnered, House Bill 1084 paved the way for other bills, such as California SB 206, to take action against the NCAA amateurism ruling even though it did not make much headway itself. This thesis will focus on SB 206 as it received the most support and made the most progress towards student-athlete compensation.

**California Senate Bill 206**

The California legislature passed Senate Bill 206, Collegiate athletics: student athlete compensation and representation, on September 30, 2019. The bill was first announced on February 5, 2019, by State Senator Nancy Skinner (“Senator Nancy Skinner Announces,” 2019). The bill, which is commonly referred to as Fair Pay to Play Act, (Berkowitz, 2019) received a 66-0 vote from the California State Assembly and a 31-5 vote from the Senate before it was then signed by Governor Gavin Newsom (Kim, 2019). The bill will go into effect on January 1, 2023,
and will allow student-athletes to receive money from their names, images or likenesses (NIL) and sign with licensed agents. The bill has received much support from athletes around the U.S., and other states have since modeled bills of their own after SB 206, though it does not pay athletes for their labor, which many believe is a critique of the law (Tynes, 2019). Before the NCAA changed its policy on October 29, 2019, California member schools of the NCAA would have faced prohibition from NCAA championships if their players profited from NIL. The NCAA was challenged to change its model to support laws that allow amateurism or face pressure to disband (Tynes, 2019). While California Senate Bill 206 is the first to be passed and will not take effect until 2023, other bills in North Carolina and Ohio had originally planned to take action much sooner than the January 2023 deadline (Anderson, 2019), which would have caused the NCAA to react quicker than originally planned. California is often referred to as a progressive state when it comes to lawmaking, and it is often recognized for its legislative initiatives such as childhood vaccination enforcement, mandated abortions pills, and requirement to pay student-athletes for use of their name, image and likeness (Hiltzik, 2019). The state also hosts powerhouse universities like Stanford, UCLA, and USC, who are recognized for hosting some of the best college sport programs in America (“2020 Best College Athletics,” n.d.). California is a formidable opponent and the NCAA faced their biggest threat and challenge against their control of college athletics.

**NCAA Policy Change Announcement**

On October 29, 2019, the NCAA announced that it was changing its policy that forbid student-athletes from profiting to preserve their amateur status. The change in policy will allow players the “opportunity to benefit from the use of their name, image and likeness in a manner consistent with the collegiate model” (“Board of Governors,” 2019, para. 1). Each division is
responsible for deciding the details of new rules for its own division, though the Board of Governors will finalize the policy no later than January 2021 to help respond to state and federal regulatory concerns. So there is no confusion that student-athletes are not employees of the university, there must be a “clear distinction between collegiate and professional opportunities” (para. 8). The announcement from the NCAA came one day after the NFL Players Associate and National College Players Association released their own announcement that they would examine ways that would allow student-athletes from receiving a share of the revenue that uses their name, image and likeness (Setty & Young, 2019).

Issues, such as student-athlete compensation, can be framed by both the media and organizations so that the issue can be portrayed in a way that best suits the message sender. Jones and Chase (1979) believed that “business in general has been ineffective in defining and then validating its position on public policy issues” (p. 3), which can be applied to the NCAA in this case as the organization has been repeatedly challenged on the issue of student-athlete compensation given the amount of money generated by collegiate sports. An issue can have multiple frames that highlight different aspects of the issue. Framing theory helps to understand how the media or an organization focuses on a specific issue and presents it to the public (Jones & Chase, 1979), Darmon, Fitzpatrick and Bronstein (2008) state that “framing decisions may be the single most important strategic decision made in a public relations effort” (p. 374). Using framing theory, this thesis seeks to explore what frames the media used to present both sides of the college athlete compensation debate through a qualitative thematic analysis. The next chapter provides a review of literature regarding public policy issues and framing theory, offers an overview of framing within the sports context and framing of the NCAA, and details the organization of the NCAA. Then, an overview of the proposed methods is provided followed by
the findings. Finally, this thesis discusses the findings and implications of the analysis and provides concluding thoughts and limitations.
Chapter 2: Literature Review

This literature review will first outline what an issue and public opinion is, how the issue of student-athlete compensation is a public policy issue, and the process through which issues progress. Framing theory will be examined in detail, beginning with the background of the theory, public policy framing, framing sports media, framing the college student-athlete compensation issue and framing in the National Collegiate Athletic Association. A brief history of the NCAA will be given along with information about the structure, enforcement mechanisms, and membership. The gap in research among framing the issue of student-athlete compensation will be addressed, followed by the research questions.

Issues

An issue is created when individuals perceive a problem exists and that it is significant (Crable & Vibbert, 1985). An issue is an “unsettled matter which is ready for decision” (Jones & Chase, 1979, p. 3), and “a subject and the result of public discussion” (Femers, Klewes & Lintemeier, 1999, p. 254) though Hainsworth (1990) defined it as “a point of conflict between an organization and one or more of its publics” (p. 33). From a public relations perspective, a practitioner's goal is to solve the issue, though in most circumstances issues are never solved but are temporarily resolved (Crable & Vibbert, 1985). While temporary relief can be found from effectively dealing with a problem, it does not mean that the matter is completely settled. Because issues are socially constructed (Heath & Palenchar, 2009), the importance level of an issue is determined by publics. Varying degrees of importance can be assigned to an issue, such as in the case of student-athlete compensation. Issues also have many sides, which can cause them to be presented differently and conflictingly by three agents: citizens, businesses and government (Jones & Chase, 1979). These three agents do not have equal authority but have
varying degrees of power and influence. Authority lies in the hands of the government as it has the power to govern and make laws. Citizens and business have influence, and that influence affects the government’s authority to shape and enact public policy (Crable & Vibbert, 1985; Jones & Chase, 1979).

This study focuses on a public policy issue, though not all issues fall within this domain. Scholars defined public policy as “the result of interaction between public and private points of view” (Jones & Chase, 1979, p. 7), and “the description and explanation of the causes and consequences of government activity” (Dye, 2005, p. 244). Organizations can and should partake in shaping public policy discourse when the issue being discussed affects organizations as well as their publics (Heath & Palenchar, 2009). Public policy can be categorized into one of three types: regulatory, distributive, or redistributive (Blank, 2018). Regulatory registrants are those that are put on groups or individuals, while distributive focuses on public goods. Redistributive policies, which are known for being controversial, are often efforts by governments to change the allocation of money in society. Involvement by the government can be permissive, affirmative, regulatory or prohibitive, and all policies have winners and losers. Citizens, businesses and the government all have power and influence, though the authority resides with those that enact laws.

Crable and Vibbert’s (1985) Issue Life Cycle model argued that issues can progress through five stages: potential status, imminent status, current status, critical status and dormant status. Potential status of an issue is when some individuals exhibit interest in the issue, while imminent status is obtained when the issue is accepted by others as a problem. An issue can become current status when three functions occur: information is being spread by sources, coverage of the issue starts to show sides, and individuals are given roles in the depiction of the
issue. The issue of student-athlete compensation is currently classified as ‘critical status’ because individuals and groups have identified with the pro-compensation and anti-compensation sides of the issue and the NCAA is being forced to take action on the issue. If an issue fails to gain attention or resolved, it is considered dormant. The goal is for issues to complete the Issue Life Cycle, but Crable and Vibbert note that “issues remain issues: only the status changes” (p. 7).

Student-athlete compensation has been through previous life cycles as individuals and groups have presented the issue in court in efforts to create public policy for their side (Nocera, 2016), and the issue had turned dormant after court rulings. In recent months, the media and technology have brought change among the responsibilities of organizations during issue management, and this issue has again passed the first three statuses as more information and support has assembled on the side of pro-compensation (Kitchin & Purcell, 2017). The sports media field has made the distinction that student-athlete compensation is a problem that needs to be dealt with and has been brought to the court system for public policy. The media has the ability to influence the salience of issues, which is “making a piece for information more noticeable, meaningful, or memorable to audiences” (Entman, 1993, p. 51). Framing can be used by the media to impact the public’s perception of an issue.

Public Opinion

An important question asked by interest group leaders, journalists, corporate executives, and even the president is: “What does the public think?” (Glynn et. al., 2015). There are many definitions of public opinion: some believe that the public opinion is the general will of a political community (Shafritz, 1988), while others argue it is the beliefs of different publics (Plano & Greenberg, 1982). Journalists inform those who are curious about the attitudes and wants of the audience, political leaders need to know what initiatives voters support, and
corporate executives must pay attention to the trends from consumers. In order to understand the
opinion of the public, sample surveys and opinion polls are frequently used; however, other non-
traditional techniques can be used:

In the scripts of television programs; at political rallies, town meetings, or city council
hearings; in the rhetoric of journalism; in the dialogue among friends who frequent a
coffeeshouse or neighborhood bar; in the political discussions one sees on the Internet and
on social media or hears on talk radio. (Glynn et. al., 2014, p. 18).

The data gathered helps inform how the public feels about policy issues, social practices, or
lifestyle issues, which is important when facing issues that concern the public.

Pertaining to sports, McAllister (1998) found that the financial high stakes that come
from the billions Americans spend on sports have incentivized the sports industry to actively
maintain sports as an apolitical cultural to avoid alienating fans through partisan politics. College
Pulse, a student-focused analytics company, polled students about student-athlete compensation
and found that 53% of students were in support of compensation (Hess, 2019). When specifically
asked about profiting off of an athlete’s likeness, 77% of students were in favor and when asked
about student-athletes profiting from their image, 80% of students agreed it should be allowed.
Nietzel, a writer for Forbes, stated that “two-thirds of adults now believe college athletes should
be permitted to earn money from the use of their names, images and likeness,” and that half of
Americans believe athletes participating in major university sports programs should get a cut of
the revenue universities earn from broadcast deals (2020, para. 1).

Framing Theory

For years, communication scholars have sought to uncover and understand mass media
and communication from a variety of viewpoints. Media can be used to tell a story, with
journalists and organizations acting as the story-tellers, and how that story is told is through a
concept known as framing (Cornelissen, 2014). Stemming from research regarding agenda-
setting theory (McCombs, Shaw & Weaver, 2014), in which the media tell the audience what to think about as opposed to what to think, framing theory focuses on the creation of messages that connect with and influence how people process information and make judgements about various aspects of perceived reality (Cornelissen, 2014; Entman, 1993). According to Entman (1993), framing occurs when communicators “select some aspects of a perceived reality and make them more salient in a communicating text, in such a way as to promote a particular problem definition, causal interpretation, more evaluation, and/or treatment recommendation” (p. 52).

Framing was originally developed by Erving Goffman (1974) with roots in sociology and psychology (Pan & Kosicki, 1993). The process involves the “inclusion and exclusion of information in a message as well as emphasis” in order to promote certain aspects of perceived reality (Cornelissen, 2014, p. 211). Goffman (1974) labeled framing as the “schemata of interpretation,” which allows individuals to package, classify, organize and interpret information or experiences to make sense of the world around them (p. 21 as cited in Pan & Kosicki, 1993, p. 56). The process of framing can be applied to a number of fields, though it is most commonly used in journalism (Entman, 1993).

Goffman (1974) noted that people apply various frameworks based on their experiences and views of the world in order to interpret information. When framing is utilized by message creators, such as journalists, receivers of that message are more inclined to interpret it based on the presence of frames within the message, which can be established through the use of keywords, visuals, stereotypes, culturally accepted symbols and ideas, among other information containing specific connotations for a specific audience (Entman, 1993; Godefroitd, Berbers, & D'Haeens, 2016). Framing “highlights” certain aspects of reality, placing an emphasis on
specific message elements while excluding other aspects, “which might lead individuals to interpret issues differently” (Borah, 2011, p. 248).

  Framing also has four functions that media can utilize: defining the problem, diagnosing the cause, making moral judgements, and suggesting solutions (Entman, 1993). Frames define a problem when they help the public determine the costs and benefits of a concern. When the cause of the problem is identified, frames diagnose the cause. Causal agents are then assessed by the frames and then offer solutions to the problem identified. Entman (1993) believed that frames could vary depending on the communication process in which it is found, including the communicator, the text, the receiver and the culture, which could cause different interpretations of the content. Framing can occur consciously or unconsciously by the communicator when they decide what to say and what not to say. The presence of frames in text can enhance specific aspects of information, which can include both the source of information and key words and phrases. The communicator’s message can be misinterpreted by the receiver, as the culture, among other factors, shape the beliefs of individuals.

Since its origins, framing research has been furthered by a number of researchers. According to Chong and Druckman (2007), a frame is used in two ways by communication scholars. With regard to the media, a frame is the “words, images, phrases, and presentation styles that a speaker uses when relaying information about an issue or event to an audience” (Chong & Druckman, 2007, p. 100). The second way a frame can be used is a frame in thought or individual frame. Goffman (1974) referred to an individual frame as “one’s understanding of a certain situation, constructed in one’s own mind” (Chong & Druckman, 2007, p. 101). Scheufele (1999) also concluded that framing can be classified into two categories: media frames and audience frames. Media frames tell the audience what information about the event they believe
the audience should know about the central storyline. Audience frames are held by an individual and help them shape how they understand the world around them. Additionally, framing can be considered a macroconstruct and a microconstruct (Scheufele & Tewksbury, 2006). As a macroconstruct, framing is the method in which communicators present information to resonate with the cognitions and experiences of their intended audience. Framing as a microconstruct “describes how people use information and presentation features regarding issues as they form impressions” (Scheufele & Tewksbury, 2006, p. 12). The issue of student-athlete compensation has both macroconstructs and microconstructs of framing that the media uses to influence the impressions of the audience.

Scheufele (1999) identified and explained the four key processes needed in framing: frame building, frame setting, individual level processes of framing, and feedback loop. Frame building seeks to understand what factors can affect the framing of news content, such as organizational or structure factors or specific characteristics of journalists. Frame setting is similar to agenda setting in that it is focused on the salience of issues. Behavioral, attitudinal, or cognitive outcomes are examined to identify what individual level processes of framing are impacted by audiences. The feedback loop examines the communication process between audiences and journalists to help understand what information is being retained. De Vreese (2005) extended this model and focused on how frame building examines the factors that influence the structure of frame, while frame setting examines the interaction between media and an individual’s understanding of the world and the influence the media has on the individual's outlook. This process was understood as a more logical progression of framing compared to Scheufele (1999) because it took individual attitudes into consideration when processing how they would frame the news.
While framing theory has been criticized in recent literature for no clear distinction between emphasis and equivalency frames and a “lack of empirical specification regarding the cognitive mechanisms that make a frame effective” (Shulman & Sweitzer, 2018, p. 156), the distinctions between various frames and their effects have strengthened the field of communication. Some broad types of framing include equivalency, valence, and attribute. According to Shulman and Sweitzer (2018), equivalency framing draws on the reader’s rendering of various sources and networks of information as reliable or accountable, which can be effective because of the accessibility. Attribute framing influences the way the attributes or characteristics of an event is portrayed because they can manipulate language and other aspects of the frame. Valence framing, alternatively, allows events or objects to be placed in a positive or negative positioning rather than focusing on the characteristics (Shulman & Sweitzer, 2018). Knowing how the process of framing takes place can lend to a deeper understanding of how the media utilizes frames in its messaging. While both organizations and the media can frame issues, this thesis will focus on how the news media framed student-athlete compensation regarding California Senate Bill 206 by using attribute frames.

**Public Policy Framing**

Jones and Chase (1979) believed that non-governmental agencies struggled to advance their positions on public policy issues, which includes framing these issues to their benefit. Framing is beneficial for studies about anything from news coverage to perceptions of certain groups of individuals in society, and several studies have focused on the framing of public policy issues. Fridkin, Wintersieck, Courey, & Thompson (2017) used framing as the basis for their study on the intersection between race and police brutality. They found three main frames within media: police brutality, law and order, and race. Their research supported former findings that...
certain news frames enforce audience beliefs about different groups of people. Likewise, Lawlor and Tolley (2017) published an article examining news media frames of immigrants and refugees looking to relocate to Canada. They found that, in the case of refugees, the framing is often negative in nature and therefore supporting an anti-immigration view. Public perception of social movements is another area of research where framing provides a lens of analysis. Nicolini and Hansen (2018) found that media coverage of the Women’s March suggested that while the event may have been seen by some as controversial, the actual key messages of the march were framed positively, and many news networks embraced coverage of the event as a whole. Research suggested that framing can push back against the spread of misinformation surrounding an event or movement, if only news networks would adopt the appropriate frames. Although framing is prominent in media studies, it can also be found in a sub-context of sports media where sports issues and events are held at more importance.

**Framing in Sports Media**

Individuals’ schemas affect and influence information processing, though the media has the power to impact the way the audience views an issue (Scheufele, 1999). Media frames focus on “attributes of the news itself” (Entman, 1991, p. 7), whereas individual frames are the “internal structures of the mind” (Kinder & Sanders, 1990, p. 74). Sports media research has examined how both individual and media frames influence the perception of the message that the audience receives. Research has found framing is “based on the assumption that how an issue is characterized in news reports can have an influence on how it is understood by audiences” (Scheufele & Tewsbury, 2006, p. 11). Thus, sports media has the ability to influence the public by presenting message frames that sway public opinion both generally and specifically. Semetko and Valkenburg (2000) distinguished between general news frames and issue-specific news
frames: general news frames are used by both media and individuals to convey and interpret information, whereas issue-specific news frames focus on a certain problem and the “consequences for public opinion” (p. 95).

Considering its applicability to different contexts and fields, framing is often seen in a variety of media settings including sports. Throughout the years, sporting events, activities and athletes have become a major staple in the mainstream and local media. Sports make up a large part of national and international culture, and many of the ways in which audiences think about and construct meaning regarding sports have to do with the media frames that are utilized (Chuma, 2012). Studies examining framing within this context range from impressions of individual athletes to portrayals of sporting events. Many studies have focused on the public portrayal of athletes (Atwell Seate, Harwood & Blecha, 2010; Lewis & Weaver, 2015; Sanderson, 2010). Framing can improve an athlete’s image and therefore, their team’s image. Dumitriu (2016) found media framing of athletes to help boost perception of certain heroes of the sport.

Other studies have found support for frames that centered around nationalism in the sports setting (Jakubowska, 2017), noting the frames the media rely on when telling a story can enable the viewers or readers feel more connected to the story that is being presented. Research covering the Paralympic Games found that news networks most often relied on the frame of optimism, considering the athletes’ abilities to overcome their disabilities to compete as the focus of the media, rather than what country they are from (Kim, Lee, & Oh, 2017). Chuma (2012) examined the Cape Town World Cup stadium in news coverage and found four common frames: “The debate as a class and racial issue, the stadium as an environmental issue, the stadium as a statement of bad leadership, and some sporting disciplines are better than others” (pp. 321-324).
Chuma advanced that framing theory places emphasis not only on how the messages are constructed and portrayed, but also on the ways in which they can be perceived by the audience, and it is evidenced that these are the primary ways in which the audience could begin to think about the stadium and the debate over its construction.

Sports media has also had a variety of public policy issues that have been framed by the media. While student-athlete compensation falls under constitutional rights, issues that pertain to hazing, sexual harassment, transgender policies, and gender equity often appear in news stories (Green, 2015). Concussion protocol has been studied through the lens of framing with the increased media attention on injured players. A study on professional athletes Robert Griffin III and Jay Cutler found various frames that emerged which portrayed the quarterbacks as a hero, a sissy, and a sympathetic figure (Sanderson et. al., 2014). Another framing study on concussions found media frames that explored health consequences, the future of football, parental impact and downplaying of injuries, to name a few (Cassilo & Sanderson, 2018). Media framing of student-athlete compensation is important because it can be used to influence public opinion toward one side of the issue. Public opinion can then influence the authority who has the power, which, in this case is the court system regarding California Senate Bill 206.

**Media Framing in College Athletics**

A limited number of framing studies have specifically explored media portrayals of college athletics. Framing analyses have been applied to help understand how race is discussed in college athletics (Eastman & Billings, 2010; Novak & El-Burki, 2015). The portrayal of women in sports media has been examined by many scholars (Daniels, 2009; Fink, 2015) in the professional and collegiate context and in the context of gender and racial stereotyping (Harrison & Fredrickson, 2003). Other areas of research include the portrayal of successful professional
athletes, such as quarterback Tim Tebow (Butterworth, 2013). While gender and race are common themes of how the media frames college sports and athletes, there is limited research on how the NCAA is portrayed and frames its messages.

Scholars have begun to explore how the National Collegiate Athletic Association is framed by the media. The NCAA is portrayed as “a progressive organization that safeguards the interests of college athletics” (Nite, 2017, p. 338). The NCAA is responsible for keeping collegiate sports fair and safe for college athletes, which can come with criticism in relation to controversial issues. Washington (2004) examined the NCAA in previous years and concluded that the NCAA has modified some rules to appease the public in order to remain in charge of intercollegiate athletics and to avoid public policy. Nite (2017) extended the research conducted on sport institutions to explain how message framing is an essential part of maintaining power within organizational structures. He specifically looked at the NCAA by conducting a content analysis of its media with a focus on the public relations campaign and responses to “high-profile legal challenges” (pp. 339). The NCAA has been examined with framing theory, but there is no known research on how the media is framing the issue of student-athlete compensation.

**Framing the College Student-Athlete Compensation Issue**

As the previous literature suggests, framing can play a large role in how issues involving athletics, sporting events, and even individual players, are portrayed and received by the public. Currently, few studies have investigated athlete compensation, let alone collegiate athlete compensation, from a framing perspective. However, research has identified “financial exorbitance” as a dominant frame in intercollegiate athletics frontpage articles, where athlete compensation was a constant discussion on these covers (Weight & Cooper, 2015). Secondary frames also emerged in the study, including “pay-for-play”, identify and public perception
problems, and athletics and academia conflict, which was found to be troubling as media is becoming more critical of how college sports, and the organizations supporting college sports, operate. The NCAA and president Mark Emmert were quoted for their stance on the payment issue that was featured on covers. Even though the NCAA is a self-governing authority, its recent response to the California Senate Bill 206 illustrates how actions by external agents, such as legislators, can pressure the organization into taking action on issues. To provide more context for this case, background on the NCAA’s structure, enforcement mechanisms and membership requirements is provided next.

**National Collegiate Athletic Association**

When founded in 1906 as the Intercollegiate Athletic Association, the purpose of the NCAA was to regulate student-athletes to help diminish dangerous acts that were being committed (Treadway, 2017). Since then, the NCAA has become a multi-million dollar enterprise that promotes the same promise that was first made. Critics argue that the NCAA uses its mission statement as a front and has not been protecting the integrity of athletes as promised. The debate of student-athlete compensation has been alive for many years but more attention was brought to the issue during the *O’Bannon v. NCAA* (2014) trial. Nocera (2016) examined the court case regarding collegiate basketball player Edward O’Bannon, who believed he should receive compensation under public rights for being depicted in the EA college basketball video game. The first ruling of the trial was in favor of O’Bannon, though the NCAA appealed the process. The United States Court of Appeals for the Ninth Circuit made adjustments to the original ruling, most importantly reversing the decision to enable student-athletes to receive a stipend from universities. In favor of O’Bannon, the court decided that the NCAA violated the antitrust laws through its amateurism rules. Furthermore, Grimmett (2014) explained how the
NCAA violated Section 1 of the Sherman Antitrust Act because student-athletes should be able to receive payment for their public likeness.

The NCAA releases a manual annually that includes the rules and regulations that govern college athletics. Bylaw 12 covers the much-debated amateurism ruling. This bylaw outlines the stipulations student-athletes must follow. Student-athletes are allowed to receive funding through higher education in the form of tuition, which is a benefit of the bylaw (Afshar, 2014). Until the NCAA officially changes its policy, athletes cannot receive money for commercial advertisement, promotion, or endorsement; however, institutions are allowed to use the physical appearance, name, and pictures of a student-athlete for both charitable and educational purposes (Kaburakis, 2012). Both sides of the debate argue that rulings should support and protect student-athletes, though there is no agreeable solution from all sides (Grimmett, 2014; Gruna, 2017; Wolohan, 2017).

**Structure**

The NCAA has a page on its website that details the governance of the organization. The legislative bodies that make up the NCAA consist of volunteers from schools of all divisions and a group of committees that “set association-wide policy” (“Governance,” n.d., para. 1). The highest governing body of the NCAA is the NCAA Board of Governors, which includes 25 members, such as NCAA president Mark Emmert. There are four nonvoting members which include: The NCAA president, the chairs of the Division I Council, the Division II Management Councils, and the Division III Management Councils. The NCAA president is only allowed to vote in the case of a tie. There are 21 members who vote that include:

(a) eight chancellors or presidents from the Division I Board of Directors from Football Bowl Subdivision (FBS) institutions; (b) Two chancellors or presidents from the Division I Board of Directors from Football Championship Subdivision (FCS) institutions; (c) two
chancellors or presidents from the Division I Board of Directors from Division I subdivision institutions; (d) two Division II chancellors or presidents from the Division II Presidents Council; (e) two Division III chancellors or presidents from the Division III Presidents Council; and (f) five independent public members. ("Board of Governors," n.d., para. 1)

The goal of this structure is to ensure that each division in the NCAA operates consistently with one another. The rules, policies and general principles are evaluated by the board to guarantee consistency throughout the organization.

Enforcement Mechanisms

A section of the NCAA’s website is dedicated to enforcement. The mission of the enforcement department is to “uphold integrity and fair play among member schools; ensure that compliant schools and student-athletes are not disadvantaged by their compliance and provide fair procedures and timely resolution of cases” ("Enforcement," n.d., para. 1). Division I enforcement procedures differ from Division II and Division III. Division I, which is arguably the highest level of collegiate sports will be examined in detail. Each division also has its own infractions process, which includes Division I infractions and Level III/Secondary infractions ("Division I Infractions Process," n.d.).

The infractions process for Division I begins with rule creation, where NCAA members are expected to uphold the rules adopted. When a rule is considered to be violated, an investigation process takes place by the enforcement staff. The conclusion of the investigation will either find that there was no violation, or one of four potential resolution tracks will be recommended: negotiation resolution, summary disposition track, hearing track, or independent accountability resolution process. The first three tracks involve the enforcement staff, schools, involved individual and Committee on Infractions, and the independent accountability resolution process involves the complex case unit, schools, involved individuals and independent resolution
panel. Only the summary disposition track and hearing track can request appeals, by which the Infractions Appeal Committee makes the final decision.

Level III secondary infractions are isolated violations that only provide minimal advantages (“Level III Secondary Infractions,” n.d.). These cases are not public and usually include violations concerning recruiting, amateurism and eligibility, awards, academic eligibility, and playing and practice seasons. Level III violations can be processed as Level I or Level II depending on the information that is brought forth with the case, and many cases result in financial penalties and coaching suspensions. Aside from the infractions process, the NCAA focuses on making an environment that is trusting and cooperative through member schools and their athletic departments (“Development,” n.d.). This process is to ensure that members will report potential violations as soon as they occur to hold the integrity of college sports.

**NCAA Membership**

Schools are not required to be a member of the NCAA, though there are more than 1,200 schools, conferences and affiliate organizations that choose to align themselves with the NCAA within the three divisions it offers (“Membership,” n.d.). Each school chooses which division it wants to join, though there are specific guidelines and requirements that must be met. The NCAA states that “the active member institutions and voting conferences are the ultimate voice in all Association decisions” (“Membership,” n.d., para. 1). There are five different categories of membership in the NCAA: active member, provisional member, member conference, affiliated member, and corresponding member. An active member is an accredited college institution who chooses to follow the bylaws. Provisional members have applied for active membership and have to follow all of the same rules of active members. The member conference has all the same rights of active members except that schools cannot compete in NCAA championships. Affiliated
members are “nonprofit coaches or sports association whose function and purpose are directly related to one or more sports in which the NCAA conducts championships” (“Membership,” n.d., para. 4). Last, a corresponding member only receives publications and mailings from the NCAA but is not one of the prior mentioned members. If members do not agree with what the NCAA stands for, they are not required to affiliate themselves with the organization, but this decision means they will not be able to participate in NCAA tournaments such as the College Football Playoffs or March Madness.

While the NCAA does hold some power over universities who are members of the organization, ultimately the NCAA regulations are a private law. Universities have a contractual agreement to participate within the organization, which has the effect of law but not a state actor, and failing to abide by rules is a breach of contract. However, states such as California are passing laws that state that these types of agreements are, in fact, illegal. This means the NCAA’s policy will become null in the states where these laws are passed, and eventually, no NCAA lawsuits will hold up in these states (Povich, 2019). Presumably, these schools could choose not to be in the NCAA but then marketing will be less successful if no one cares about schools not in the NCAA and there will be no common standard to uphold.

Before the NCAA changed its stance on the issue, if colleges in California were to pay their athletes, which SB 206 now allows, this action would violate NCAA membership rules and disqualify universities from partaking in NCAA tournaments and championships. The conflicting rules of the NCAA and state laws left colleges with a difficult decision and put pressure on the NCAA to change its regulations regarding amateur status. The NCAA has maintained dominance through strategic actions; learning to control boundaries, learning to control practices and learning to control understanding of rules despite a conflicting stance on the student-athlete
compensation issue (Nite, Ige & Washington, 2019), though SB 206 is arguably the biggest legitimacy challenge the NCAA has yet to face.

**Research Questions**

The issue of whether student-athletes should be compensated has become a disputed rule within the sports community that has gone through many lifecycles (Crable & Vibbert, 1985). Framing is important in college athletics, specifically the NCAA, because the way messages are framed allow for organizations to maintain control of institutions (Lawrence & Suddaby, 2006). If the NCAA is unable to effectively frame its messages on the issue of student-athlete compensation, then it is likely to lose control on the contentious conversation, which could potentially challenge the rights and legitimacy of the organization. The issue of student-athlete compensation has been identified as a frame in media, but no known published research has examined how the media portrays both sides of the issue.

The present study seeks to bridge the gap in the literature by providing a deeper insight into the framing of the conversation on NCAA student-athlete compensation. Previous research has yet to identify what frames are emerging from the way media presents this issue, which has the potential to influence public policy. This thesis will research the issue to help understand how the media portrays arguments that are for and against student-athlete compensation in regard to media coverage about the California Senate Bill 206.

The debate regarding the payment of student athletes by the NCAA can be portrayed in a variety of ways, both positively and negatively, which leads to the following research questions:

**RQ1a:** What message framing strategies are used in media coverage about the California Senate Bill 206 to present arguments for student-athlete compensation?
RQ1b: What message framing strategies are used in media coverage about the California Senate Bill 206 to present arguments against student-athlete compensation?

Drew Stokesbary, the representative for the state of Washington, filed for House Bill 1084 in early January 2019. Though there are many supporters of the bill and what Stokesbary is doing for student-athletes, there is also disfavor of the bill passing (Stone, 2019). California (Gutierrez & Fenno, 2019) and North Carolina (Carter, 2019) have received identical responses in their states with similar bills. News articles have been released from news sources that reinforce both sides of the debate in each state, framing that their side is more advantageous to student-athletes than the other. In order to determine the ways in which framing is most significantly utilized, this study also accounts for the questions:

RQ2: Which framing strategies are more prevalent with regard to the issue of student-athlete compensation in California Senate Bill 206?

When SB 206 passed in September 2019 the media coverage changed from ‘what if the bill passes’ to ‘what will happen now that the bill has passed’. This change in conversation may impact how frames emerge from the media coverage, and it is important to examine how the presentation of an issue may change depending on major developments in a case. To understand how these cases can develop and change over time, this study also poses the following question:

RQ3: What framing strategies are used in media coverage before and after California Senate Bill 206 passed?

The NCAA announced on October 29, 2019, that it would enact new bylaws and policies that would allow student-athletes to profit from their name, image and likeness by January 2021. This change in policy by the NCAA may impact how frames emerge from the media coverage on
the issue of student-athlete compensation within this case. In order to determine if framing strategies changed, this study also accounts for the question:

**RQ4:** How, if at all, did framing strategies change following the NCAA’s announcement changing its policy?

A range of news outlets covered California Senate Bill 206 in different areas of the U.S.. This thesis seeks to understand if and how framing strategies differentiate between national and local media outlets and between sports and mainstream media outlets. Differences may occur between local and national outlets as local outlets may have a more personal stake in the matter, whereas national outlets look at the issue from multiple perspectives and may have more reach, thus more of an impact on public opinion. Sports outlets may also frame the debate differently than a mainstream outlet that does not focus solely on sports. To find answers to these two questions this study asks the following questions:

**RQ5a:** How are message framing strategies of California Senate Bill 206 presented differently from national and local media outlets?

**RQ5b:** How are message framing strategies of California Senate Bill 206 presented differently from sports and mainstream media outlets?
Chapter 3: Methods

This specific case study will examine how the media framed the issue of student-athlete compensation in California Senate Bill 206. A qualitative case study approach will use thematic analysis to examine how news coverage framed SB 206 before and after it was passed. The following section will describe the case study approach method, give detail to how the data was collected and examine how the data will be analyzed.

Case Study Approach

Baxter and Jack (2008) defined a qualitative case study as “an approach to research that facilitates exploration of a phenomenon within its context using a variety of data sources” (p. 544). The issue at hand is not explored through just one lens; source triangulation is used, which allows for a deeper understanding through collecting data from more than one method. Miles, Huberman and Saldana (1994) define a case as “a phenomenon of some sort occurring in a bounded context” (p. 25). Yin (2003) designates that a case study should be used when four variables are in consideration: first, if the research wants the focus to be answering the “how” and “why” questions: second, if the behavior of those in the study cannot be manipulated; third, if the contextual conditions have the potential to be relevant to the study; or fourth, if the boundaries are unclear. While “how” and “why” questions are important, this thesis seeks to understand what frames are being portrayed so that future research can examine these questions.

Specifically, the exploratory case study method is implemented because the researcher seeks to explore the student-athlete phenomenon in the chosen data set. An exploratory case study is defined as “a means to define the necessary questions and hypotheses for developing consecutive studies” (Mills, Durepos & Wiebe, 2009, p. 372). The exploratory case study is often used when an area lacks detailed preliminary research, and it allows the researcher
flexibility in regard to research design for both qualitative and quantitative methods. A qualitative approach was chosen over a quantitative approach as it allowed for frames to emerge from the data, which is necessary in an area that has limited research on the phenomenon, and because there is a need to understand how the issue is presented before testing hypotheses.

The case study method is appropriate in researching media frames on the student-athlete compensation issue because California Senate Bill 206 was the first law to substantially challenge the NCAA on this issue. The qualitative case study approach has been applied to previous framing studies (Darmon et al., 2008; Katikireddi, Bond, & Hilton, 2014), which makes it an appropriate method to use when examining this type of phenomenon. The specific case being examined has been a tipping point for many other states to take action against this issue.

**Data Collection**

News articles pertaining to California Senate Bill 206 were collected for this study, as SB 206 was the first state bill to be passed regarding this issue. News articles were collected from NewsBank Inc. using the search terms “California Senate Bill 206.” Article collection began February 5, 2019, the date the bill was introduced. Article collection ran through November 29, 2019, one month after the NCAA’s announcement. Even though media coverage continued to follow this bill in 2020 because of its impact on other state bills, the time frame permitted an observation of how the media framed the issue within the context of the SB 206 case from its introduction to one month following the NCAA’s reaction. After removing duplicates, a total of 157 articles were collected from NewsBank Inc., which provides reliable news sources, such as *USA Today*, *CNN* and *New York Times* (see Appendix A). Fifty-nine articles were published before the bill passed, and 98 articles were published after the bill passed on September 30, 2019.
Data Analysis

The goal of this study is to identify common themes regarding California Senate Bill 206 to help understand how the media portrays the issue to the public, not to understand why the media takes a specific stance on the issue. Attribute framing was used because it examines how characteristics of an event are influenced and portrayed by manipulating language (Shulman & Sweitzer, 2018). This thesis relied on a thematic analysis to examine how the media framed the issue of college athlete pay within the California Senate Bill 206 case. Thematic analyses “move beyond counting explicit words or phrases and focus on identifying and describing both implicit and explicit ideas within the data, that is, themes” (Guest et. al., 2012, p. 10). In qualitative analysis research it is the most commonly used method of analysis, and Guest et. al. (2012) argued that it is the most useful method to apprehend the complexities in a textual data set. An inductive analysis was used to identify themes in the data collected, meaning that no pre-existing coding frames were used to fit the data to a specific theme (Frith & Gleeso, 2004). The primary rationale in choosing the thematic analysis method was to have freedom to explore frames in a diverse data set and case study that has been understudied. As there has been no known research on this topic, this method permitted a generalization of data and offered guidelines for use in a wider context in the future.

To conduct a thematic analysis, this study followed a process outlined by several qualitative scholars (Aroson, 1995; Braun & Clarke, 2006; Patton, 2002). Aroson (1995) gives four steps on how to complete a thematic analysis: collect data, identify patterns in the data, “combine and catalogue related patterns into sub-themes,” and build an argument to why those themes are valid (p. 2). First, this thesis collected data from credible sources, identified themes from the student-athlete compensation issue, used those themes to build sub-themes, then
explained why the themes chosen are valid. Following the data collection, common themes of the student-athlete compensation issue were identified and described, then interpreted and analyzed for significance and implications for future research (Braun & Clarke, 2006). Next, to complete the thematic analysis, the researcher took notes on each article collected and recorded themes in a coding sheet. The coding sheet includes columns for the article title, the date published, the authors, the news outlet, indication of local or national outlet, indicator of a sport or mainstream outlet, and themes found in the article. These boundaries helped organize information that was relevant to the research questions of the study.

After every article was examined, the researcher analyzed the coding sheet to determine what themes commonly occurred for anti-compensation and pro-compensation, whether the frames were used before or after California Senate Bill 206 passed, the extent to which the frames changed following the NCAA’s announcement, and how frames differed between local and national outlets, as well as sport and mainstream outlets. This information was recorded in a separate document, where the researcher identified what themes emerged from the data. Then, the findings from the data were presented in the following section of this thesis, using thick description to support each theme (Patton, 2002). The findings from the thematic analysis were compared to extant research in the field to help extend the knowledge of how the media frames the issue of student-athlete compensation and offer implications for how the NCAA should proceed when faced with an issue that is challenging its control.
Chapter 4: Findings

This thesis applied thematic analysis to examine 157 news articles pertaining to California Senate Bill 206 to identify how the media portrayed student-athlete compensation in news articles published between February 5, 2019, to November 29, 2019. This chapter provides the findings of the analysis, which included eight themes and 24 sub-themes that were pro-compensation and anti-compensation. This chapter begins with a presentation of the framing strategies adopted by the media that were pro-compensation or anti-compensation. Next, this chapter identifies which framing strategies were most prevalent regarding SB 206. Then, this chapter discusses what framing strategies were found in media coverage before and after SB 206 was announced. This will be followed by addressing how framing strategies changed after the NCAA’s policy announcement. Finally, this chapter will outline how framing strategies differentiate between local and national news outlets, and sport and mainstream news outlets.

Pro-Compensation Framing Strategies

This thesis examined how news articles framed the debate surrounding student-athlete compensation. The first research question in this study asked the following:

RQ1a: What message framing strategies are used in media coverage about the California Senate Bill 206 to present arguments for student-athlete compensation?

Analysis revealed three themes from the news articles that supported the notion of compensating student-athletes: 1) exploitation of student-athletes, 2) celebrity support, and 3) the NCAA system needs to change.

Table 1

Themes and Sub-themes for Pro-Compensation
<table>
<thead>
<tr>
<th>Themes Present</th>
<th>Sub-Themes</th>
</tr>
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<tbody>
<tr>
<td>Exploitation of student athletes</td>
<td>Right to earn money</td>
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<td></td>
<td>Sport is like a job</td>
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<td></td>
<td>Student-athletes cannot support themselves</td>
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<td></td>
<td>Student-athletes are like Olympians</td>
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<td></td>
<td>Disproportionate gender impacts</td>
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<tr>
<td>Celebrity support</td>
<td>“Game changer”</td>
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<tr>
<td>“The NCAA system needs to change”</td>
<td>“Rebalance the power arrangement”</td>
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<td></td>
<td>Gives reason to stay in school</td>
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<td></td>
<td>“Bankrupt model”</td>
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<td></td>
<td>SB 206 protects athletes</td>
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<tr>
<td></td>
<td>Ripple effect</td>
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<td></td>
<td>NCAA violates antitrust laws</td>
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**Exploitation of student athletes**

The first theme, *exploitation of student athletes*, emerged in 30 news articles. This theme focused on the argument that student-athletes were not making a penny of the revenue that they create for universities, and they are arguably the primary reason why university athletic departments and the NCAA make so much money. Wilner, a journalist for *The Daily News*, (2019) argued that “This law stands in stark, come-and-get-us-if-you-dare contrast to the NCAA’s longstanding model that treats athletes as indentured servants... sorry, as unpaid amateurs” (para. 4). University athletic departments, such as UCLA’s, can generate around $130 million in a year while the NCAA, a non-profit organization, rakes in over a billion dollars. However, student-athletes do not see any of that money, and supporters of SB 206 argue that student-athletes are exploited by requirements that are outside the game and practice time of their sport. Some athletes are required to be featured in promotional content that is used by the university to increase ticket and merchandise sales. A quote from Jones (2019) summarizes this theme: “student athletes are overworked, undersupported and, most importantly, unpaid for their
labor” (para. 5). Articles that included this theme provided arguments for the compensation of student-athletes for reasons ranging from athletes should be able to earn what they are worth, they generate significant amounts of money for their schools and the NCAA, and that they should have the same rights as all other college students. Five sub-themes, 1) right to earn money, 2) sport is like a job, 3) student-athletes cannot support themselves, 4) student-athletes are like Olympians, and 5) disproportionate gender impacts, also fall under this theme.

**Right to earn money.** Forty-nine news articles included statements that presented the general message that student-athletes have the right to earn money for their athletic efforts. Many news articles incorporated California Sen. Steven Bradford, who claimed that “this is a civil rights issue of today” (Killion, 2019a, para. 6; Oxford, 2019, para. 5), emphasizing a need for equal payment opportunities in college sports. LeBron James was also a key proponent of this position and argued that “Athletes at every level deserve to be empowered and to be fairly compensated for their work…” (Anderson, 2019, para. 5).

**Sport is like a job.** The subtheme sport is like a job reflects the argument that playing sports at the collegiate level can be comparable to a full-time job, and therefore, athletes should be compensated for the time they dedicate toward these efforts. Several articles compared the work of student-athletes to other students employed in various capacities by their universities. Some journalists offered that “in fact, each and every category of college students- except one- is free to use their talents or skills to earn a living while in school, from computer science and engineering majors to music and film students” (Skinner & Wilk, 2019, para. 5). Similarly, University of Texas at Austin quarterback Sam Ehlinger publicly advocated for student-athlete compensation, saying that “every other industry in the world, you get paid for your value. I believe that should be equal everywhere” (Smoot, 2019, para. 10). Other news articles also called
attention to the number of hours that student-athletes dedicate to their sports on a weekly basis. For example, the 2015 Growth, Opportunities, Aspirations and Learning of Students in College (GOALS) study found that Division I student-athletes spend an average of 34 hours a week on their sport, not including the 38.5 hours per week on academics, which nearly equals two full-time jobs (C. Murphy, 2019).

**Student-athletes cannot support themselves.** In 18 articles the sub theme “student-athletes cannot support themselves” was mentioned in conjunction with an outline of the benefits SB 206 could provide for student-athletes and their families who were unable to support themselves while playing sports at the collegiate level. The University of California (UC) Student Association president noted that many student-athletes are low-income students of color without a full scholarship and will not be continuing on a “lucrative professional league career” once they graduate college, and allowing these students to be compensated would enable them to support themselves and their families (Asimov, 2019, para. 14). Georgia State men’s basketball player Malik Benlevi said compensation was not about making millions of dollars, but being able to help his mom and sisters out, and “being able to make a little bit of money to put in my pocket to buy groceries and pay for my apartment” (Indrisano, 2019, para. 33). A study from UCLA found that 86% of students were worried about their financial circumstances (Raychawdhuri, 2019), which is supported by BJ Williams, a student-athlete at Mt. San Antonio College, who moved to a three-bedroom apartment with six other students to save money because his football schedule did not allow time for a job (Mello, 2019).

News articles in this theme also argued that student-athletes on scholarships are unable to afford basic necessities. Sen. Steven Bradford claimed “We’ve seen the one-and-down scenario far too long, where student athletes leave school for financial burdens, assisting their families”
(Harvey, 2019, para. 36). While the NCAA often argued that it has the best interest of student-athletes in mind, this frame explains how student-athletes are being taken advantage of and are unable to support themselves with the control the NCAA has on compensation.

**Student-athletes are like Olympians.** Supporters of SB 206 also argued that student-athletes were comparable to Olympic athletes, who had to be amateurs until professionals were allowed to participate in 1986. UCLA football coach Chip Kelly reflected on historical precedent and argued “the Olympic model changed over time. I would imagine the NCAA model has to change over time” (Goon, 2019, para. 12). One news outlet pointed out that in 2001 the NCAA allowed college athletes, like Katie Ledecky, to receive money from the U.S. Olympics Committee for winning medals and training but also still be eligible to compete at universities (Lake County Record Bee, 2019). Similarly, SB 206 would allow all student-athletes, not just Olympians, profit from their name, image and likeness (NIL). By comparing collegiate athletics and the Olympics, proponents of SB 206 suggest that student-athletes should be given the same right to be compensated such as Olympians are.

**Disproportionate gender impacts.** While many of the articles focused on the exploitation of student-athletes in general, some articles focused on how current NCAA policies specifically exploit female student-athletes. Sen. Nancy Skinner stated that the NCAA was disproportionately harming women, “who have fewer opportunities to earn an income from professional sport after college” (Horn, 2019, para. 5). SB 206 would allow those who are “on the lower rungs of the athletic-industrial complex” to benefit from their name, image and likeness when many of these students often do not receive scholarships or have the opportunity to go pro (Mello, 2019, para. 6). College is often the only time female athletes can earn money because they have fewer professional sports opportunities than men, and usually get paid less
(Bradford, 2019). Sen. Holly Mitchell commented that she went to high school with two great basketball players, one being Reggie Miller who played in the NBA for 18 years. She stated that his sister, Cheryl Miller, “was the better basketball player but her professional options were limited after her collegiate career at USC that included two national championships” (Beam, 2019, para. 16).

**Celebrity support**

Forty-four articles included statements from public figures, such as professional athletes, who advocated for student-athlete compensation. LeBron James, Draymond Green, Sen. Bernie Sanders, Ed O’Bannon, Dez Bryant, and other celebrities expressed their support for SB 206 in various news articles. The attention from the celebrities further brought attention to the issue and was able to lend momentum to the cause. James’ company, SpringHill Entertainment, even produced a documentary film for HBO titled “Student Athlete” that presented how student-athletes are impacted by the governing bodies of intercollegiate athletics, such as the NCAA (Martinez, 2019). One sub-theme emerged from this theme: “game changer.”

**“Game changer.”** LeBron James became a prominent figure in the debate and branded SB 206 “a game changer.” The term “game changer” emerged from James’ September 5, 2019 tweet that gathered over 106,000 likes and 24,000 retweets (Asimov, 2019), and stated “Everyone in California- call your politicians and tell them to support SB 206! This law is a GAME CHANGER. College athletes can responsibly get paid for what they do and the billions they create” (Martinez, 2019, para. 5). The term was further used in other tweets from James, “California can change the game. This is only right waaaayy overdue. #morethananaathlete” (Killion, 2019a, para. 23). Since the tweet other celebrities, like former NBA player Ed
O’Bannon, who previously sued the NCAA in *O’Bannon v. NCAA* (2014), have used the term to gather support from the public and spread awareness about the issue.

*“The NCAA system needs to change”*

The next theme for pro-compensation, *the NCAA system needs to change*, was presented in 13 news articles and centered around the claim that the bill would revolutionize college athletics by allowing student-athletes be compensated for their NIL, which proponents argued was long overdue (Errigo, 2019), and that NCAA rules need to evolve (D. Murphy, 2019). This theme was coined by Georgia State student-athletes, who directly claimed “The NCAA system needs to change” (Indrisano, 2019, para. 2). Six sub-themes emerged: 1) “rebalance the power arrangement,” 2) “bankrupt model,” 3) gives reason to stay in school, 4) SB 206 protects athletes, 5) “ripple effect,” and 6) the NCAA violates antitrust laws.

*“Rebalance the power arrangement.”* Supporters of the bill said that SB 206 would “rebalance the power arrangement” that the NCAA has in college athletics (Zeigler, 2019, para. 4) by putting the interests of student-athletes on par with the interests of universities (Navarro, 2019). SB 206 has important provisions that would allow student-athletes to be on a level playing field with their institutions as 1) athletes can only be paid through third parties, 2) student-athletes cannot undermine their school’s current endorsement contract, and 3) female athletes will have the same opportunity as male athletes, which bypasses Title IX concerns that already exist regarding the gender gap (Potter, 2019). An opinion column penned by a student at the University of Southern California advanced that “this bill is a vital step forward for college athletes, marking the beginning of a necessary, full-on war between legislators and the NCAA” (Poe, 2019, para. 4), and would thus serve as a catalyst for the issue.
“Bankrupt model.” Other news articles described the NCAA as a “bankrupt model” that profited from student-athletes but blocked them from earning a single penny (Deklinski, 2019), emphasizing that the current NCAA structure is outdated with little long-term viability. The News Tribune believed the model puts universities “ahead of the students that they are supposed to serve”, and needs to be disrupted (Kirschman, 2019, para. 10). NBA player Draymond Green also spoke of the bankrupt model, which he believed was a term coined by Gov. Newsom. He accentuated its lack of logic, claiming that

It’s like, it doesn’t - it does not make any sense. I can make all the money off your likeness, and the moment you decided to make some money off your likeness, you can’t play here anymore. You’re ineligible. You’re suspended. It’s backwards (Gutierrez, 2019, para. 11).

Other news articles stated that the NCAA’s amateurism model is fraud because it overwhelmingly benefits the NCAA through financial gain. It was argued that the NCAA’s opposition of SB 206 would likely amount to “an illegal group boycott that would violate federal and California antitrust laws” (Marot, 2019, para. 15) if the NCAA were to remain opposed to the legislator. By passing SB 206, student-athletes would be entitled to some of the $14 billion a year that the NCAA generates from the events that the athletes participate in, such as the NCAA Men’s Division 1 Basketball Tournament. One sports journalist also argued that NCAA sports were already comparable to professional sports: “I don’t know if you’ve seen some of these football stadiums, but they don’t exactly scream amateur athletics” (Mullenix, 2019, para. 22). South Carolina State Sen. Marlon Kimpson indicated that the NCAA’s amateurism ruling is a “fictitious bylaw that calls this whole multi-billion dollar enterprise ‘amateur’” (Indrisano, 2019, para. 33). Many agreed with Sen. Kimpson in that the NCAA’s business model is not in the best interest of student-athletes and has been hiding behind the term ‘amateurism’ for far too long.
Gives reason to stay in school. Another frame articulated that the necessary change the bill would provide would also give student-athletes a reason to stay in college, for longer or even at all. Both professional and college athletes were quoted saying they planned on leaving college athletics or went directly to the professional leagues because the NCAA put limitations on their earnings (Schneider, 2019). If student-athletes were able to be compensated for their NIL, it could prolong the lifespan of a student-athlete at the college level. Several athletes emphasized this particular component, drawing from their personal experiences. For example, LeBron James was quoted on “The Shop” saying he went straight to the NBA out of high school to “get his mom out of the situation she was in,” which he could not have done if he went to college (Ruiz, 2019, para. 7). Others underscored related advantages of paying student athletes, such as degree completion. For instance, Sen. Skinner believed a side benefit of SB 206 is that “the law may convince elite college athletes to stay in school and finish their degrees, rather than succumbing to the siren’s call of pro sports” (McLaughlin, 2019, para. 29).

SB 206 protects athletes. The sub theme SB 206 protects athletes presented messages that urged Gov. Newsom to sign the bill to protect the student-athletes. The Record (2019) explicitly wrote, “Sign the bill, governor. Protect them” (para. 7). A UCLA student journalist urged that SB 206 will “protect student-athletes from the current exploitation by California schools that exists under the NCAA’s rules, and provide them a platform for future success” (Raychawdhuri, 2019, para. 27). Similarly, another journalist emphasized that under SB 206 “no student could lose a scholarship for doing so and no college could be punished for allowing its students to do this” (Chemerinsky, 2019, para. 2). This quote spoke to how SB 206 would protect athletes from being punished by the NCAA for being compensated for their NIL.
“Ripple effect.” Of the 157 news articles analyzed, 45 mentioned that SB 206 was causing a “ripple effect” in a positive manner. Many other states, including Florida, New York, Washington state, Colorado, Maryland, Illinois, North Carolina and South Carolina, were following California’s path and making bills of their own (D. Murphy, 2019; Sprecher, 2019). Some news articles advanced that the “ripple effect” would “cause a domino effect that would kill the NCAA restraints” (De Leon, 2019, para. 9). Others noted that the “ripple effect” SB 206 was forcing would cause the NCAA to amend its rules in order to keep control of college athletics (Glass, 2019), and that with other states jumping on board it would keep a lone wolf from being punished (Stone, 2019). News reporter McCollough (2019) asked: “Now that California has taken this step, how many other progressive states will want to be on the wrong side of history?” (para. 22).

The NCAA violates antitrust laws. Lastly, several articles argued that the NCAA would be violating antitrust laws, thereby inhibiting fair competition, if it was to retaliate against SB 206. It has been said that the NCAA violates the antitrust law since “compensation rules restrained trade and resulted in anticompetitive effects” (Petrosyan, 2019, para. 6). This falls under the theme the NCAA systems needs to change because many news articles argued that violating antitrust laws goes against the fundamental rights that all people – including student-athletes – have, and the rules of the NCAA should change to reflect those of the federal level. In many news articles California State Sen. Nancy Skinner emphasized that the NCAA often loses antitrust cases in court and uses threats as its primary weapon, noting specifically, “numerous legal scholars assert that SB 206 is constitutional and that an NCAA ban of California colleges from championship competition is a clear violation of federal antitrust law” (Bumbaca & Berkowitz, 2019a, para. 7). She expanded by stating “trade organizations like the NCAA are
prohibited under U.S. antitrust law from excluding institutions merely for following a state law” which means that the NCAA cannot fine schools for following the law (Asimov, 2019, para. 10). Thus supporters of SB 206 argued that student-athletes should be fairly compensated because blocking students who are compensated from participating in NCAA-sanctioned events is a violation of federal antitrust laws.

**Anti-Compensation Framing Strategies**

In addition to presenting arguments that were in favor of student-athlete compensation, several frames also emerged from news articles that challenged this activity. Thus, the second research question of this study asked the following:

**RQ1b: What message framing strategies are used in media coverage about the California Senate Bill 206 to present arguments against student-athlete compensation?**

Five themes emerged from the news articles to support the notion that student-athletes should not be compensated: 1) *need for distinction*, 2) *SB 206 is unfair*, 3) *celebrity pushback*, 4) *national issue*, and 5) *SB 206 is unconstitutional*.

**Table 2**

*Themes and Sub-themes for Anti-Compensation*

<table>
<thead>
<tr>
<th>Themes</th>
<th>Sub-Themes</th>
</tr>
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<tbody>
<tr>
<td>Need for distinction</td>
<td>Players are not university employees</td>
</tr>
<tr>
<td>Bill is unfair</td>
<td>Unfair recruiting advantage</td>
</tr>
<tr>
<td></td>
<td>Unfair playing field</td>
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<tr>
<td></td>
<td>Unfair national championships</td>
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<tr>
<td>Celebrity pushback</td>
<td></td>
</tr>
<tr>
<td>National issue</td>
<td>Schools do not support</td>
</tr>
<tr>
<td></td>
<td>Exclusion hurts student-athletes</td>
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</tbody>
</table>
Supporters of the NCAA and anti-compensation argued that SB 206 would “blur the lines between collegiate and professional sports” (Dzwonczyk, 2019, para. 4) and advocated that “all reforms must treat our student-athletes as students pursuing an education, and not as professional athletes” (Heim, 2019, para. 8), creating a clear distinction between amateurs and professionals. A CNN producer stated that “current NCAA amateurism rules are put in place to distinguish college athletes from professional athletes” (Kim, 2019, para. 8), and that SB 206 would challenge this balance. Schools and conferences, such as the Pac-12, believed SB 206 would have negative consequences for California athletes and that allowing student-athletes to be paid would take away the innocence of college athletics. Others opposed to the bill agreed that students should be “focused on earning their studies, not their salaries” (Morales, 2019, para. 5).

**Players are not university employees.** Furthermore, the sub theme *players are not university employees* was present in nine news articles. Henderson (2019), a writer for the *San Diego Union-Tribune*, directly stated that “student-athletes are not and should not be university employees” and payment for college sports would lead to this avenue (para. 13). Others opposed to the bill were worried that student-athletes would be treated like a business because the language of the bill is “very much aligned with a for-profit mindset” (Wogenrich, 2019, para. 3), and that full scholarships and stipends are enough to satisfy the needs of student-athletes (Layton, 2019). NCAA president Mark Emmert was quoted saying “this is just a new form of
professionalism and a different way of converting students into employees” (Campbell, 2019, para. 11).

Bill is unfair

A second theme, bill is unfair, emerged with a combined total of 80 news articles to present the idea that SB 206 would make college athletics unfair. Those opposed to SB 206 believed the bill “would create interstate inequalities and confuse prospective student-athletes” because rules would not be consistent throughout college athletics (Connon, 2019, para. 6), and that the “essential element of fairness and equal treatment in college sports would be erased” because players would not be treated equally in all states (Coote, 2019, para. 1). Some went as far as saying SB 206 would be “the demise of intercollegiate athletics as we know it” because each state would try to one-up each other with new laws that would encourage student-athletes to go to specific states where they would benefit most (Burleyson, 2019, para. 5). A student journalist at the University of Houston even predicted a scenario where powerful states like Texas, Alabama, Ohio and Florida would adopt similar bills rather than losing advantages that California would gain, ultimately waging a costly fight that some universities and states would lose (Jones, 2019). Three sub-themes emerged: 1) “unfair recruiting advantage,” 2) “unfair playing field,” and 3) “unfair national championships.”

“Unfair recruiting advantage.” Those challenging SB 206 argued that the bill would give California schools an “unfair recruiting advantage” because “athletes would be drawn to schools where they could potentially profit” (Ackerman & Sturges, 2019, para. 4). Not only would this legislation give California schools an advantage, but it would also give specific schools in California that could afford to pay student-athletes more than other universities an even higher advantage. As a result, opponents voiced concern that other schools were following
California with their own models of SB 206, which could lead to discrepancies in athlete pay and other disadvantages with the states that do not catch up in time (Campbell, 2019). The bill would also only align with top schools that already have connections and sponsorships, and therefore, could make the best sales pitches to top prospective players (Oerman, 2019).

Alternatively, those states that did not adopt a similar law to SB 206 could also possibly have the upper hand. Because many student-athletes would be drawn to California for compensation, USA Today columnists believed that California schools would be banned from NCAA competitions, which could also discourage athletes from attending those schools (Bumbaca & Berkowitz, 2019a).

**Unfair playing field.** There were 16 news articles that explicitly stated that SB 206 would create an unfair playing field. The common consensus was that the bill would disrupt the dynamic of college selection and make a level playing field impossible (Henderson, 2019). The California Aggie, the student newspaper of UC-Davis, quoted the NCAA in saying that SB 206 is “a patchwork of different laws that will make unattainable the goal of providing a fair and level playing field for 1,100 campuses and nearly half a million student-athletes nationwide” (Navarro, 2019, para. 7). The Billings Gazette writer Potter (2019) mentioned its worries about Montana schools playing California schools and what future schedules may look like if SB 206 were to pass.

**Unfair national championships.** Third, opponents argued that if the bill passed it not only creates an unfair playing field, but more specifically, “threatens to alter materially the principles of intercollegiate athletics and create local differences that would make it impossible to host fair national championships” (Hobson & Strauss, 2019, para. 11). The unfair advantages SB 206 would create eventually would result in California schools being banned from competing
in NCAA competitions such as the College Football Playoffs or March Madness (“Editorial: Allow college athletes,” 2019). With specific universities being able to pull in top prospects, the playing field for championships would be uneven, and the same schools would be dominating the field (McLaughlin, 2019).

**Celebrity pushback**

Just as many athletes spoke out in support of SB 206, others – including Heisman Trophy winner Tim Tebow - were quoted in arguments against student-athlete compensation and were pushing back against SB 206. Tebow claimed that allowing student-athletes to be compensated would lead to a selfish culture in college athletics. During an interview on ESPN’s “First Take”, Tebow stated:

> But now we’re changing it from ‘us’, from ‘we’, from ‘my university’, from being an alumni where I care which makes college football and college sports special, to then, ‘OK, it’s not about us. It’s not about we. It’s just about me.’ And yes I know we live in a selfish culture where it’s all about us but we’re just adding and piling on top that where it changes what’s special about college football. We’ve turned it to the NFL, where who has the most money, that’s where you go. (Jansen, 2019, para. 8).

Tebow also argued that SB 206 would undermine the quality of collegiate athletics, making them “indistinguishable from the National Football League and ruin what makes college football unique” (Kaur, 2019, para. 7) and have adverse effects on school loyalty because student-athletes would go to the schools that would offer them the most money (Sundeen, 2019).

**National Issue**

Many news articles featuring anti-compensation frames presented the argument that student-athlete compensation was a national issue and could not be solved by the state of California. For any change to work it was argued that “any reform to be fair and meaningful to all student-athletes it needs to occur at the national level and be adopted by the NCAA” (Means,
2019, para. 6), and that “a national model of collegiate sport requires mutually agreed upon rules” (Bumbaca & Berkowitz, 2019a, para. 11). *The Emory Wheel* writer Ciara Murphy (2019) urged Congress to pursue national legislation that would help maintain fairness and “not shatter college athletics as we know it” (para. 7). San Diego State athletic director J.D. Wicker even mentioned that the state of California was refusing to collaborate with the NCAA to make compensation for NIL happen (Leonard, 2019). Six sub-themes emerged: 1) *schools do not support*, 2) *exclusion hurts student-athletes*, 3) “a single bill won’t solve all of its problems,” 4) *schools will lose revenue*, 5) “ripple effect,” and 6) *bill creates confusion*.

**Schools do not support.** Universities in California were often quoted for their disinterest in SB 206, from which the sub theme *schools do not support* emerged. UC Berkeley, Stanford and USC were often mentioned to be aligning with the NCAA and opposing Gov. Newsom’s legislation (Guerrero, 2019), and Stanford specifically was worried that it would present serious challenges to universities such as itself (“California Aggie,” 2019). Zhang (2019), *The Stanford Daily* writer, mentioned that “increased costs to ensure compliance with the law and lead to fines or even expulsion for the NCAA” were its biggest worries as it urged Gov. Newsom to veto the bill (para. 12).

**Exclusion hurts student-athletes.** Opponents also argued that the exclusion from the NCAA California schools would face would hurt rather than help student-athletes, creating a national concern. The Pac-12 released a statement showing its opposition to the bill: “The Pac-12 is disappointed in the passage of SB 206 and believes it will have very significant negative consequences for our student-athletes and broader universities in California” (Heim, 2019, para. 8). Others worried that California schools would be banned from the NCAA and “the very student-athletes the bill intended to assist would be adversely affected” (Gutierrez & Fenno,
2019, para. 18) because it would “run the risk of compromising their eligibility” (Martinez, 2019, para. 16).

Other news articles specifically mentioned how SB 206 would be hurting female student-athletes. A statement from the Pac-12 Conference read: “it imposes a state law that conflicts with national rules and will likely reduce resources and opportunities for student-athletes in Olympic sports and have a negative disparate impact on female student-athletes” (Harvey, 2019, para. 24). Dean of women’s collegiate sports in California, Tara VanDerveer, echoed the sentiment and also believed that “the money that’s been under the table is now going to be on top of it” and that money will be funneled to male athletes (Killion, 2019b, para. 9).

“A single bill won’t solve all of its problems.” Anti-compensation views argued that “a single bill won’t solve all of its problems” and that SB 206 was not a complete solution (Poe, 2019, para. 13). An intellectual property rights lawyer stated that he believed that the bill would cause more issues to arise, such as how student-athletes will commit to teams and universities, and how publicity licenses will be adapted (Hough II, 2019). Jacksonville football coach John Grass even mentioned how baseball has a better system than college football because athletes can be immediately drafted after high school (Edwards, 2019). Furthermore, Grass said that the law would not “protect the purity of the game” (para. 10).

Schools will lose revenue. Schools were also worried that revenue that they cannot afford to lose would be lost to student-athlete compensation. UCLA officials had concern that SB 206 would “sap sponsorship money that currently goes to universities, leading to budget cuts and the potential elimination of sports that don’t generate the millions in revenue” (Hobson & Strauss, 2019, para. 15). The UC system also argued that “the colleges themselves could lose the sponsorship revenue they use to support teams and pursuits that don’t make money” (Sanchez,
2019, para. 10). Schools outside of California even commented on the possible revenue loss. Wyoming athletic director Tom Burman believed there would be unintended consequences from bills like SB 206 and that a plan should be put together that addresses “issues at the highest level but doesn’t create undue hardships for the vast majority of Division I institutions, which aren’t generating their own money to cover their own budget” (Potter, 2019, para. 14).

“Ripple effect.” Another sub theme that supports national issue is “ripple effect.” Those opposed to SB 206 argued that the “ripple effect” SB 206 was causing would actually hurt the momentum the bill was creating because the inconsistency of the bills supported the notion that the NCAA was necessary. Leonard (2019), a writer for The San Diego Union-Tribune, pointed out that instead of uniting and rising against the NCAA, states were passing their own bills. The proposed bill from New York would expand beyond NIL and would actually require athletic departments to share 15% of annual revenue with student-athletes (Afoaku, 2019), which would hurt many schools as some departments can barely support themselves. The ripple effect SB 206 was causing would make it impossible to keep college athletics consistent throughout the country with states having their own laws.

Bill creates confusion. Last, bill creates confusion is the final sub theme under “national issue” as the bill was creating confusion for “current and future athletes, administrators, and campuses” because the effect it would have on college athletics was unknown (Deklinski, 2019, para. 10). The Daily Californian, the UCLA newspaper, said the common consensus when asking about SB 206 is “I don’t know” (Sundeen, 2019), while other important officials, such as Nebraska football head coach Scott Frost, believed that the universities were going to be forced to pay players (Mullenix, 2019). Even after the NCAA released its policy announcement, The
Stanford Daily (2019) said that more questions were being raised rather than answered with regard to the bill.

**SB 206 is unconstitutional**

Occurring in 21 news articles, “SB 206 is unconstitutional” developed as a theme to support the anti-compensation view. NCAA president Mark Emmert was often quoted asking California to reconsider what they thought to be an “unconstitutional bill” (Svrluga, 2019a), and many news articles agreed with the sentiment (Bumbaca & Berkowitz, 2019b; De Leon, 2019). Legal experts said that SB 206 could give California schools a trade advantage over states that did not adopt similar legislation, and that “Congress has complete power to regulate interstate commerce. Individual states do not,” and intercollegiate athletics would fall under interstate commerce (Svrluga, 2019b, para. 13).

Violate Commerce Clause. A sub-theme, violate Commerce Clause, emerged to support the notion that SB 206 violated The Dormant Commerce Clause, which means that Congress has power over interstate commerce and states cannot discriminate against interstate commerce or unduly burden it (Commerce Clause, n.d.). The NCAA argued that it would violate the federal Commerce Clause and put student-athletes at a disadvantage (Grosbard, 2019), and many argued that the NCAA was within its rights to enact different bands on member universities that try to promote and enact legislation like SB 206 (Torpey, 2019). The Whit (2019) quoted political science professor Kathy Balin, who demonstrated how SB 206 violated the clause: “Interstate commercial activities negatively impacted may include activities and articles of commerce such as interstate game broadcasting, sales and shipping of collegiate apparel across state lines, and interstate travel of collegiate players and coaches” (para. 8).

**Prevalence of Framing Strategies**
This thesis sought to understand what framing strategies prevailed the most in the news articles analyzed because the majority has the influence to control the narrative of the issue. To that end, the following question was introduced:

**RQ2:** Which framing strategies are more prevalent with regard to the issue of student-athlete compensation in California Senate Bill 206?

To answer the second research question, a table was made to help explain the occurrences of themes and sub-themes in the news articles analyzed. As demonstrated in Table 3, both pro- and anti-compensation themes and sub-themes were frequently mentioned in the news articles.

**Table 3**

*Themes and Sub-themes Occurrences*

<table>
<thead>
<tr>
<th>Theme</th>
<th>Number of occurrences</th>
<th>Subtheme</th>
<th>Number of occurrences</th>
</tr>
</thead>
<tbody>
<tr>
<td>Exploitation of student athletes</td>
<td>30</td>
<td>Right to earn money</td>
<td>49</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Sport is like a job</td>
<td>26</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Student-athletes cannot support themselves</td>
<td>17</td>
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<tr>
<td></td>
<td></td>
<td>Student-athletes are like Olympians</td>
<td>13</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Disproportionate gender impacts</td>
<td>6</td>
</tr>
<tr>
<td>Celebrity support</td>
<td>44</td>
<td>“Game changer”</td>
<td>13</td>
</tr>
<tr>
<td>“The NCAA system needs to change”</td>
<td>13</td>
<td>“Rebalance the power arrangement”</td>
<td>12</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Gives reason to stay in school</td>
<td>11</td>
</tr>
<tr>
<td></td>
<td></td>
<td>“Bankrupt model”</td>
<td>7</td>
</tr>
<tr>
<td></td>
<td></td>
<td>SB 206 protects athletes</td>
<td>8</td>
</tr>
<tr>
<td></td>
<td></td>
<td>“Ripple effect”</td>
<td>45</td>
</tr>
<tr>
<td></td>
<td></td>
<td>NCAA violates antitrust laws</td>
<td>12</td>
</tr>
<tr>
<td>Need for distinction</td>
<td>51</td>
<td>Players are not university employees</td>
<td>9</td>
</tr>
</tbody>
</table>
Specifically, there were a total of 306 pro-compensation themes and sub-theme mentions, and 377 anti-compensation mentions, indicating that anti-compensation framing strategies emerged more frequently throughout news coverage of the bill. The following section begins with discussing the prevalence of anti-compensation themes before examining the frequency of pro-compensation themes.

The theme bill is unfair was most prevalent in the 157 news articles as authors argued that SB 206 would lead to inequity in college athletics through an unfair recruiting advantage, unfair playing field, and unfair national championships. Primarily, these opponents focused on the unfair recruiting advantage that the bill would lend to California and states that adopted similar laws. The second most prevalent theme was need for distinction, which entailed that professional and college athletes should not be considered the same, and that SB 206 would take away the distinction between professional and college football. Third, national issue emerged in 46 news articles to present the message that student-athlete compensation should be discussed at the national level and not just in the state of California.
The *celebrity support* theme occurred in 44 news articles, which is four times more than *celebrity pushback*, the least prevalent theme with 10 occurrences, indicating that there was more direct support of the bill rather than criticism from celebrities specifically. Following *celebrity support*, the theme *exploitation of student athletes* was presented in 30 news articles to describe the ways in which student-athletes were being taken advantage of by the NCAA amateurism ruling. *SB 206 is unconstitutional* was the third to last theme in the number of occurrences, only followed by “*the NCAA system needs to change*” and *celebrity pushback*. *SB 206 is unconstitutional* stemmed from NCAA president Mark Emmert, who believed that the legislation from California was unlawful, and “*the NCAA system needs to change*” was the final pro-compensation theme, which entailed that proponents of SB 206 were long overdue and a shift in the division that control college athletes was necessary.

While the most prevalent theme supported the anti-compensation argument, the most prevalent subtheme was for the pro-compensation side. Occurring 49 times, right to earn money supported the notion that student-athletes have a civil right to be paid. However, unfair recruiting advantage only fell behind by two occurrences and argued that SB 206 would give California preferential outcomes when faced with recruiting for upcoming seasons. Overall, news articles that mentioned that SB 206 was unfairly presented, reasoning that it would give an unfair recruiting advantage more often than an unfair playing field and unfair national championships combined, which may suggest that the recruiting environment would be most affected by the bill and make the most impact on college athletics going forward. “Ripple effect” also emerged from both pro-compensation and anti-compensation sides of the debate but was much more frequently presented in support of SB 206 and was the third most prevalent theme with 45 appearances.
This finding suggests that the influence SB 206 had on other states to create their own bills was seen as an asset rather than liability.

The number of sub theme occurrences dropped after “ripple effect,” with the next closest being schools do not support, which concluded that most universities did not support SB 206. The final sub theme with more than 20 occurrences was sport is like a job, which was closely followed by exclusion hurts student-athletes, student-athletes cannot support themselves, and unfair playing field with 18, 17 and 16 occurrences respectively. Fifteen news articles presented the notion that bill creates confusion, entailing that SB 206 was complicating the issue rather than help solving it. Both student-athletes are like Olympians and LeBron James’ “game changer” sub themes were found 13 times, and three sub themes, “rebalance the power arrangement”, “ripple effect” for the anti-compensation side, and NCAA violates antitrust laws were found 12 times. When mentioning legal aspects on both sides of the argument, NCAA violates antitrust laws appeared three times more than violate Commerce Clause, which could indicate that the antitrust violation was seen as a more valid legal frame than the Commerce Clause violation. Specifically, news articles emphasized NCAA violates antitrust laws more frequently and were more likely to present this message when discussing legal implications regarding student-athlete compensation.

The final sub themes that were the least prevailing were: gives reason to stay in school, players are not university employees, “a single bill won’t solve all of its problems,” schools will lose revenue, SB 206 protects athletes, “bankrupt model,” disproportionate gender impacts, unfair national championships, and violate Commerce Clause. The next section will identify what specific framing strategies emerged throughout the coverage of SB 206.

Evolution of Framing Strategies
To help understand how framing strategies may have changed throughout media coverage of California Senate Bill 206, this study asked the following research question:

**RQ3**: What framing strategies are used in media coverage before and after California Senate Bill 206 passed?

As shown in Table 4, pro- and anti-compensation framing strategies were used throughout media coverage of SB 206. A total of 71 articles were published before September 30, 71 were published between October 1 and 28, and 15 were published on October 29 or later. Before SB 206 passed, all three themes for pro-compensation and all five themes for anti-compensation were present in coverage; however, only 11 of the 12 sub themes for pro-compensation were mentioned while all 11 sub themes for anti-compensation were present. This finding indicates that framing strategies for both sides were represented almost exactly equally in the early stage of this discussion. “Rebalance the power arrangement,” which stressed that the power arrangement that the NCAA had over college sports needed to be equalized so that student-athletes had the same power as schools, was not presented as a framing strategy before SB 206 was passed.

Before September 30, those who did not support the bill largely invoked the bill is unfair frame, specifically focusing on unfair recruiting advantage. The second most popular theme was celebrity support as prominent athletes like LeBron James publicly showed their support of the California legislation. Next, need for distinction was presented 22 times before SB 206 passed, as opponents clamored for a distinction between amateur and professional athletes, and was closely followed by exploitation of student athletes, which only had one less occurrence. National issue was the fourth most prevalent theme during this timeframe and was followed by
“the NCAA system needs to change,” SB 206 is unconstitutional, and celebrity pushback respectively.

The narrative slightly changed once SB 206 passed on September 30. Again, all themes from both sides were present but the anti-compensation perspective had the absence of two sub themes, unfair national championships and exclusion hurts student-athletes, while pro-compensation only lacked disproportionate gender impacts. Many of the anti-compensation themes stayed relatively similar in the number of occurrences before and after the bill was passed; however, all three pro-compensation themes drastically decreased. This is not consistent with pro-compensation sub themes, as the findings were not consistent before and after the bill was passed. Bill is unfair occurred more in the second time frame after the bill passed, and again, was the most represented theme during the time frame. Two more anti-compensation frames were the next most prevalent: national issue and need for distinction. These were followed by celebrity support, SB 206 is unconstitutional, exploitation of student-athletes, celebrity pushback, and necessary change. Overall, framing strategies before and after SB 206 were fairly similar; however, this is not the case after the NCAA changed its policy.

Table 4

<table>
<thead>
<tr>
<th>Timeframe and Document Count</th>
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<td>Exploitation of student-athletes</td>
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<td>Right to earn money</td>
</tr>
<tr>
<td>Statement</td>
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<td>---------------------------------------------------</td>
</tr>
<tr>
<td>Sport is like a job</td>
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<tr>
<td>Student-athletes cannot support themselves</td>
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</tr>
<tr>
<td>“Rebalance the power arrangement”</td>
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<td>Gives reason to stay in school</td>
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</tr>
<tr>
<td>Unfair recruiting advantage</td>
</tr>
<tr>
<td>Unfair playing field</td>
</tr>
<tr>
<td>Unfair national</td>
</tr>
</tbody>
</table>
To help understand if and how framing strategies changed after the NCAA announced its amateurism policy change on October 29, 2019, the following research question was asked:

**RQ4**: How, if at all, did framing strategies change following the NCAA’s announcement changing its policy?

As shown in Table 4 framing strategies changed after the NCAA announced that it was changing its policy on October 29. Only one pro-compensation theme was present, “the NCAA system needs to change,” while four of the five anti-compensation themes were identified. “The NCAA system needs to change” was illustrated in a way that was consistent with how the theme was presented before the NCAA policy announcement as frames focused on how compensation for
name, image and likeness would revolutionize college sports and wrangle the control away from
the NCAA.

The limited number of pro-compensation themes indicates that after the NCAA agreed to
change the amateur status rule, most new coverage featured framing strategies that were against
SB 206. Specifically, the need for distinction theme occurred the most frequently during this
time frame followed by national issue. Those who were opposed to SB 206 still argued that there
needed to be a separate between professional and college athletes, and that this issue needed to
be resolved at a national level rather than state-by-state.

However, four sub themes were present from both pro-compensation and anti-
compensation sides. From the pro-compensation side, “ripple effect” was often discussed by
proponents of the bill, and many believed that SB 206 was continuing to have an influence on
student-athlete compensation because other states were pushing legislation. Other news articles
also focused on the rights and needs of student-athletes (right to earn money, student-athletes
cannot support themselves) and adopted legal arguments that aimed to restrict the NCAA’s
power (NCAA violates antitrust laws). Those opposed to the bill argued that players are not
university employees and should not be treated as such. The final three anti-compensation sub
themes presented centered on power imbalances created by the bill (unfair recruiting
advantage), a lack of clarity regarding the bill’s impacts (bill creates confusion), and inconsistent
legislation (“ripple effect”).

This timeframe also had the least number of framing strategies overall, which could be
due to the insignificant amount of news coverage during this time as the narrative changed from
discussing SB 206 to directly the NCAA. While bill is unfair occurred the most in the first two
timeframes, focusing on how SB 206 was creating inequalities for college athletics, during the
final timeframe *need for distinction* and “*ripple effect*” on the pro-compensation side emerged the most. Although framing strategies were fairly similar before and after SB 206 was passed, news coverage shifted after the NCAA changed its policy.

**News Outlet Framing Strategies**

In order to understand if and how message framing strategies of SB 206 were presented differently when from a national media outlet compared to a local media outlet, this thesis asked:

**RQ5a:** How are message framing strategies of California Senate Bill 206 presented differently from national and local media outlets?

Analysis included 120 articles from local media outlets, such as *California Aggie* and *The Berkeley Voice*, along with 37 articles from national media outlets, such as *CNN* and *The Washington Post*. As shown in Table 5, local media outlets and national media outlets both presented all three pro-compensation themes and all five anti-compensation themes, as well as all sub themes from both sides. Even though there were over three times as many news articles from local media outlets, the framing strategies were all represented in both news outlets. National outlets never had more theme or sub theme occurrences than local outlets. However, for two sub themes, *NCAA violates antitrust laws* and *violate Commerce Clause*, there was an equal number of occurrences for both outlets. While every theme occurrence from local outlets was at least doubled in amount when compared to national outlets, the prevalence of themes within their own outlet type tells a different story. Every theme, with the exception of *exploitation of student-athletes* which was equal, was more prevalent in national news outlets when examining percentages. In addition, 10 sub themes were also more prevalent in national outlet and five were presented equally.

**Table 5**
### Type of News Outlet Count

<table>
<thead>
<tr>
<th>Theme and Subtheme</th>
<th>Local ((n = 120))</th>
<th>National ((n = 37))</th>
<th>Sport ((n = 3))</th>
<th>Mainstream ((n = 154))</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Exploitation of student athletes</strong></td>
<td>23, 19%</td>
<td>7, 19%</td>
<td>1, 33%</td>
<td>29, 19%</td>
</tr>
<tr>
<td><strong>Right to earn money</strong></td>
<td>39, 33%</td>
<td>10, 27%</td>
<td>0, 0%</td>
<td>49, 32%</td>
</tr>
<tr>
<td><strong>Sport is like a job</strong></td>
<td>25, 21%</td>
<td>1, 3%</td>
<td>0, 0%</td>
<td>26, 17%</td>
</tr>
<tr>
<td><strong>Student-athletes cannot support themselves</strong></td>
<td>13, 11%</td>
<td>4, 11%</td>
<td>2, 67%</td>
<td>15, 10%</td>
</tr>
<tr>
<td><strong>Student-athletes are like Olympians</strong></td>
<td>10, 8%</td>
<td>3, 8%</td>
<td>0, 0%</td>
<td>13, 8%</td>
</tr>
<tr>
<td><strong>Disproportionate gender impacts</strong></td>
<td>4, 3%</td>
<td>2, 5%</td>
<td>1, 33%</td>
<td>5, 3%</td>
</tr>
<tr>
<td><strong>Celebrity support</strong></td>
<td>30, 25%</td>
<td>14, 38%</td>
<td>3, 100%</td>
<td>41, 27%</td>
</tr>
<tr>
<td><strong>Game changer</strong></td>
<td>10, 8%</td>
<td>3, 8%</td>
<td>0, 0%</td>
<td>13, 8%</td>
</tr>
<tr>
<td><strong>The NCAA system needs to change</strong></td>
<td>9, 8%</td>
<td>4, 11%</td>
<td>1, 33%</td>
<td>12, 8%</td>
</tr>
<tr>
<td><strong>“Rebalance the power arrangement”</strong></td>
<td>9, 8%</td>
<td>3, 8%</td>
<td>0, 0%</td>
<td>12, 8%</td>
</tr>
<tr>
<td><strong>Gives reason to stay in school</strong></td>
<td>9, 8%</td>
<td>2, 5%</td>
<td>0, 0%</td>
<td>11, 7%</td>
</tr>
<tr>
<td><strong>“Bankrupt model”</strong></td>
<td>6, 5%</td>
<td>1, 3%</td>
<td>0, 0%</td>
<td>7, 5%</td>
</tr>
<tr>
<td><strong>SB 206 protects athletes</strong></td>
<td>6, 5%</td>
<td>2, 5%</td>
<td>1, 33%</td>
<td>7, 5%</td>
</tr>
<tr>
<td><strong>“Ripple effect”</strong></td>
<td>28, 23%</td>
<td>17, 46%</td>
<td>2, 67%</td>
<td>43, 28%</td>
</tr>
<tr>
<td><strong>NCAA violates antitrust laws</strong></td>
<td>6, 5%</td>
<td>6, 16%</td>
<td>1, 33%</td>
<td>11, 7%</td>
</tr>
<tr>
<td><strong>Need for distinction</strong></td>
<td>40, 33%</td>
<td>11, 30%</td>
<td>1, 33%</td>
<td>50, 32%</td>
</tr>
<tr>
<td><strong>Players are not university employees</strong></td>
<td>7, 6%</td>
<td>2, 5%</td>
<td>0, 0%</td>
<td>9, 6%</td>
</tr>
<tr>
<td><strong>Bill is unfair</strong></td>
<td>45, 38%</td>
<td>24, 65%</td>
<td>1, 33%</td>
<td>68, 44%</td>
</tr>
<tr>
<td><strong>Unfair recruiting advantage</strong></td>
<td>29, 24%</td>
<td>18, 49%</td>
<td>0, 0%</td>
<td>47, 31%</td>
</tr>
<tr>
<td><strong>Unfair playing field</strong></td>
<td>12, 10%</td>
<td>4, 11%</td>
<td>1, 33%</td>
<td>15, 10%</td>
</tr>
<tr>
<td>Issue</td>
<td>Percentage</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>-------------------------------------------</td>
<td>------------</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Unfair national championships</td>
<td>4, 3%</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Celebrity pushback</td>
<td>7, 6%</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>National issue</td>
<td>33, 28%</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Schools do not support</td>
<td>25, 21%</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Exclusion hurts student-athletes</td>
<td>12, 10%</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>“A single bill won’t solve all of its problems”</td>
<td>7, 6%</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Schools will lose revenue</td>
<td>7, 6%</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>“Ripple effect”</td>
<td>8, 7%</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Bill creates confusion</td>
<td>12, 10%</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>SB 206 is unconstitutional</td>
<td>14, 12%</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Violate Commerce Clause</td>
<td>2, 2%</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

This study also sought to understand if framing strategies were presented differently between sports news outlets and mainstream news outlets. To answer this question, this study asked:

**RQ5b:** How are message framing strategies of California Senate Bill 206 presented differently from sports and mainstream media outlets?

Analysis included 154 articles from mainstream news outlets, such as *USA Today* and *The Seattle Times*, along with three articles from sports news outlets, such as *ESPN* and *Pro Football Weekly*. As indicated in Table 5, framing strategies were not equally represented from both sport and mainstream news outlets. Sports news outlets did have all three pro-compensation themes and all five anti-compensation themes represented; however, many of the sub themes were not present from these outlets. While no sub themes dominated within the sports outlets, theme *celebrity support* was represented by all three sport news outlets.
Conversely, mainstream media outlets had all themes and sub themes from both sides. 

*Bill is unfair* was the most dominant theme that mainstream media discussed, which was consistent with previous findings as it had the most occurrences from all news outlets, with *need for distinction* closely following. The same can be said about the least prevailing, *celebrity pushback*, as it had the least number of occurrences overall and by mainstream news outlets.

In summary, the thematic analysis of news articles about California Senate Bill 206 found three pro-compensation themes, five anti-compensation themes, and a total of 24 sub themes. Anti-compensation themes prevailed more frequently than pro-compensation themes, with *bill is unfair* having the most occurrences overall. While framing strategies did not drastically change after SB 206 was passed on September 30, 2019, changes were seen after the NCAA announced its policy change on October 29, 2019. Finally, both local and national news outlets, and sports and mainstream news outlets presented all eight themes even though the number of articles from each outlet was not balanced. The next chapter of this thesis will discuss the findings and implications of this study.
Chapter 5: Discussion and Implications

This thesis examined how the student-athlete compensation debate was framed by the media, specifically focusing on California Senate Bill 206, which would allow student-athletes to be compensated for their name, image and likeness. In doing so, it addressed a gap in research as no known research has been conducted on this issue. Using a qualitative thematic analysis of 157 news articles pertaining to California Senate Bill 206, this study identified three pro-compensation frames and five anti-compensation frames, along with several supporting themes. In addition, this thesis answered five research questions that examined which framing strategies were most prevalent, how framing strategies changed after SB 206 was passed, how framing strategies changed after the NCAA announced its policy change, and how framing strategies differentiated between local and national news outlets, and sport and mainstream news outlets. This chapter will discuss how SB 206 was framed in the 157 news articles and offer implications and recommendations for the NCAA.

The Framing of SB 206

According to framing theory, media can be used to tell a story (Cornelissen, 2014) and can select frames to make them more salient in a text (Entman, 1993), which is shown in the news coverage of California Senate Bill 206. This thesis examined 157 new articles gathered from NewsBank Inc. using framing theory to understand how student-athlete compensation was framed by media. The theme that occurred the most on the side of anti-compensation, bill is unfair, largely dominated how news articles framed student-athlete compensation. Fairness is often discussed among the sports community and is a value that is highly regarded (“Fairness,” n.d.), which does not make it surprising that the theme most prevalent incorporated this value. The second most prevalent theme, need for distinction, closely followed bill is unfair by number
of occurrences, which could be due to the fact that there are already leagues that pay athletes. Much of the narrative focused on male athletes in football and basketball, as those are two of the highest salaried professional sports in the United States, though in terms of amateurism they are very different. While basketball players are able to go professional when they turn 19 and are at least one year out of high school, football players are required to wait at least three years after completing high school. This changes the urgency of compensation for the two sports, as football players are often unable to support themselves those three years before they have the opportunity to try and play professionally. Compensation for student-athletes becomes more important for these players, along with female athletes who rarely have professional opportunities, because they are unable to earn money elsewhere with the demand of their rigorous schedules, and risk suffering from a career ending injury.

The third most prevalent theme, *national issue*, also represented the anti-compensation argument. Those opposed to SB 206 believed that student-athlete compensation should be address on a national scale, rather than by individual states or institutions, to keep consistency among college athletics. This perspective also relates back to the value of fairness mentioned above because those opposed to the bill believed individual inconsistencies would make it impossible to maintain fairness nationally for college sports. The fourth most prevalent theme, *celebrity support*, was the most frequent theme on the pro-compensation side. This theme addressed how celebrities like LeBron James, Draymond Green, and Dez Bryant thought that SB 206 would change the game of college athletics for the better. Much of the commentary from celebrities emphasized how they wished compensation was available to them during college as there was a possibility they would have stayed in school longer. As these athletes are some of the best, their personal experience and views towards SB 206 gave credibility to the argument.
*Exploitation of student-athletes,* a pro-compensation theme, prevailed the fifth most of the eight themes as proponents of the bill believed student-athletes should be able to earn some of the hard-earned money that they generate for schools. Gone are the days where student-athletes are only on the field, but they are now required to complete other tasks for universities, like photoshoots for marketing, that were once not required. Many believe that rules and procedures should be updated to reflect the new demands that are required of athletes. This theme was followed by *SB 206 is unconstitutional,* in which those opposed to the bill believed that it gave California a trade advantage over states who did not adopt similar legislation. This tied closely with the sub theme *violates Commerce Clause,* which did also not occur very often. This theme occurred three times less than the most prevalent theme, which could be due to the fact that SB 206 was passed on September 30 and made the argument invalid.

Finally, the two themes with the least number of occurrences were *the NCAA system needs to change* and *celebrity pushback.* First, *the NCAA system needs to change* addressed how the bill would revolutionize college athletics and evolve policies that were long overdue. This theme had ten occurrences before the bill was passed but only three after September 30. While the bill was making progress in California, the NCAA had yet to announce its policy change which makes it surprising that the theme decreased so significantly in the two final timeframes. The least prevalent theme, *celebrity pushback,* describes how celebrities like Tim Tebow believed SB 206 would not benefit college athletics. It is possible that there was not much pushback on the bill from celebrities because the overwhelming tone from the public was that they wanted the amateurism ruling to change, and going against the majority opinion could hurt their images and reputations.
While celebrity support was the most dominating theme on the side of pro-compensation, one sub theme occurred more frequently and was the most prevalent sub theme: right to earn money. Proponents of SB 206 believed that student-athletes had a basic right to earn compensation for the work that they did for universities. While autographs and videogame appearances were previously the main ways for student-athletes to be compensated, digital media and marketing have changed the opportunities that are available for student-athletes to profit from their worth. A second sub theme, unfair recruiting advantage, only had two less occurrences than right to earn money, making the two most dominant sub themes almost equally represented on the pro-compensation and anti-compensation sides. Unfair recruiting advantage addressed how SB 206 would make future recruiting unfair for both California and other states. While California could promote the idea of student-athletes coming to the state to be compensated, before the NCAA changed its policy, student-athletes would also be banned from competition if they accepted compensation. Because this sub theme was double sided, this could explain why it occurred frequently in news articles.

The third and fourth most prevalent sub themes also came from the pro-compensation and anti-compensation sides accordingly: “ripple effect” and schools do not support. First, “ripple effect” presented the message that SB 206 was influential in gaining momentum of support for student-athlete compensation and was making more impact than any other challenges to the NCAA before it, such as O’Bannon vs. NCAA (2014). Once other states saw the progress California was making, many promoted their own legislation so that they would not fall behind, placing more pressure on the NCAA to keep control and consistency of college athletics. Conversely, many schools did not support SB 206 because they believed it would lead to more challenges. This could be because the schools, and not the states, were the members of
the NCAA and would be the ones hurt from the bill, specifically the exclusion from competition. *Schools do not support* had zero occurrences once the NCAA announced its policy change, which supports that idea that they wanted to remain members of the organization.

Interestingly, the most prevalent themes reflected opposition to student-athlete compensation as much of the commentary discussed the negative repercussions of the bill, yet the momentum from SB 206, from both the public and states that created their own legislation, had a positive effect in encouraging the NCAA to change its amateurism policy. Many believed that if the NCAA did not get behind the new legislation, then it would lose its control on college athletics. However, the majority of the media narrative was in opposition to student-athlete compensation, which did not align with the overwhelming narrative that student-athletes should be compensated for the work they do for institutions.

In addition, anti-compensation framing strategies continued to prevail after the bill passed on September 29, 2019, and after the NCAA changed its policy a month later on October 29. While support for SB 206 was expressed by celebrities, coaches, players and many others, news articles highlighted the shortcomings of the bill. Ultimately, the prevalence of anti-compensation strategies did not affect SB 206 passing or the NCAA changing its policy because there was enough support for student-athlete compensation. This shows how powerful support from key individuals can be, and with LeBron James spearheading the pro-compensation side, many believed his experience as a professional athlete made him credible on the topic of student-athlete compensation. While *celebrity pushback* was a theme on the anti-compensation side, it occurred four times less than *celebrity support*, which was also surprising because anti-compensation framing strategies dominated. Tim Tebow was the most influential celebrity in opposition of SB 206 but was often criticized because he grew up in a family who had money to
support him through college, and he did not have a long term professional career. If a celebrity with a different upbringing than Tebow were to have come out in opposition of the bill, *celebrity pushback* may have occurred more frequently in news articles and provided more credibility for the anti-compensation argument.

Even though this study focused on themes from the separate debate sides, many news articles contained framing strategies from both sides of the student-athlete compensation debate. A single news article could mention all three pro-compensation themes and five anti-compensation themes, while others could focus on only pro or anti-compensation. De Leon (2019), a writer for *The Collegian*, presented a news article that included all eight themes, but Edwards’ (2019) news article only included anti-compensation framing strategies. This finding indicates that many outlets saw the necessity of reporting all information that was relevant to the debate rather than just trying to frame the issue in support of or against SB 206.

Additionally, framing strategies were also not limited to a single side. “*Ripple effect*” emerged as a theme for pro-compensation as it had a positive effect on encouraging other states to implement their own legislation and unite against the NCAA, but it was also a theme for anti-compensation as many believed the inconsistency of bills would negatively affect college athletics. Even though much of the debate seemed black and white, there were many grey areas that were noticed by news outlets, and in five news articles, “*ripple effect*” reflected both sides of the debate in the same instance. This shows that while SB 206 gathered support and was influential in the debate, the momentum also allowed other problems to arise because of the popularity it gathered. As more states caught on to the idea of creating their own laws and being able to attract student-athletes to their state, this created the problem of keeping college athletics consistent and fair, which is what the NCAA aimed to do.
There were also themes from both sides of the argument that clashed. In addition to celebrity support and celebrity pushback mentioned prior, there was a sub theme on each side that addressed the legal aspect of the debate. The NCAA violates antitrust laws and violates Commerce Clause both addressed legal aspects of student-athlete compensation, and how the NCAA or SB 206 was violating laws. However, as also in the case of celebrities, news article occurrences prevailed on the pro-compensation side, which conflicts with the overall prevalence of anti-compensation themes.

As examined in the third research question, framing strategies were fairly similar before and after SB 206 was passed. However, framing strategies changed after the NCAA policy announcement, and surprisingly, less pro-compensation frames controlled the story. One may think that frames would have reflected the positives to come but news articles focused on the possible problems that could arise from the new changes. This was also inconsistent with the result of the NCAA changing its amateurism policy because the prevalence of framing strategies continued to oppose SB 206. The fourth research question asked how framing strategies changed after the NCAA policy announcement, and again, anti-compensation frames prevailed. It was surprising that news articles constantly framed the consequences of student-athletes compensation, while California and the NCAA made changes that went against the narrative of these news articles.

The final research questions asked how and if the news outlets would impact framing strategies. While local news outlets had more occurrences than national news outlets, there were about three times more local news outlets, which made the findings understandable. Also, both types of news outlets presented all eight themes and 24 sub themes, so the messages being framed by the outlets were consistent from both local and national sources. Local news outlets
were likely more represented because there are more local outlets compared to national, and because the bill was affecting states differently before the NCAA changed its policy. Finally, sport news outlets did present all eight themes but not all 24 sub themes. The imbalance of framing strategies used by mostly mainstream news outlets is not extremely surprising, as only three of the 157 news articles were from sports news outlets, which decreased the chance that all framing strategies would be present in sports outlets. However, it was surprising that there were not more news articles from sport news outlets, which could be a limitation of NewsBank Inc., and also because many local news outlets were school papers that covered all topics at their institution.

This study discussed how the student-athlete compensation issue had been through many life cycles and that the goal, as stated by Crable and Vibbert (1985), is to complete the Issue Life Cycle. During this study the issue was classified as ‘critical status’ because both individuals and groups were identifying with the two sides of the issue and the NCAA was being forced to take action. Since the NCAA officially took action on October 29 and changed its amateurism ruling, the issue has moved from critical to a dormant status. While this issue was temporarily resolved, that does not mean it is completely solved because the issue of student-athlete compensation could always be reopened again, as it was after the O’Bannon v. NCAA (2014) ruling.

In previous research on framing strategies in sports literature, “financial exorbitance” was a dominant frame frontpage articles that discussed student-athlete compensation (Weight & Cooper, 2015). While “financial exorbitance” was not a specific theme that emerged from this study, there was a specific themes and two sub themes that related to the excessive amount of money institutions make from student-athletes. Exploitation of student-athletes addressed the issue that student-athletes generate revenue for athletic departments and the NCAA but do not
receive a penny of it. In addition, sub theme *right to earn money* brought forth the general message that these college athletes should be able to receive compensation for their athletic efforts, and *sport is like job* mentioned how the work student-athletes do is comparable to a full-time job, in which all college students, except athletes, are allowed to use their talents to make money of their work. Though the findings from this study did not always line up with previous research, there are implications for future research about message framing in sport contexts.

**Implications for the NCAA**

The findings from this study imply that for the issue of student-athlete compensation, the dominance of frames from news outlets did not determine the decisions of the NCAA. Though California Senate Bill 206 was a strong influence in changing the policies of the NCAA, the frames set by news outlets did not support this notion. If the NCAA were to examine the themes from news articles, it is possible the dominance of anti-compensation themes would have impacted its decision to change its policy on October 29. It can also be said that the NCAA decided to go against the majority of narratives from news articles because they thought the merits of pro-compensation were salient.

As exemplified in a case study by Washington (2004), the NCAA previously has modified its rulings to appease the public to remain in control of college athletics. While this study found that anti-compensation framing strategies were most prevalent in news articles, the NCAA was consistent with previous findings and changed its amateurism ruling to keep the favor of the public. These findings, in addition to previous research, show that the NCAA seems to be more concerned with the public opinion rather than what is being reported in news articles, which is opposed to results found by Nite (2017). Specifically, Nite found that the message framing was an essential part of maintaining power within sport institutions, and if the NCAA
had sided with the most prevalent framing strategies they likely would have lost support from the public and ultimately, lost control of college athletics.

However, the majority of the public seems to believe that the NCAA did the correct thing by allowing student-athletes to be compensated because public opposition has decreased, and this support could potentially lessen some of the challenges the NCAA has faced as the sole organization controlling college athletics. While the NCAA fought against student-athlete compensation for many years, it changed its opinion due to the external threat SB 206 formed. California has often been seen as a progressive state in its lawmaking and often shapes the law development of other states, which proved to be further motivation for the policy change by the NCAA so that the organization could continue to maintain control of college athletics.

Furthermore, other organizations should consider polarizing frames and public opinion when faced with decisions that are influenced by the public, as public opinion may be the more dominant force.

The case of California Senate Bill 206 provides learning opportunities for the NCAA and other sport organizations in understanding the impact of news article framing strategies and how they may not reflect the public’s opinion. Based on the findings of the study, I recommend that organizations do not use the most prevalent frames as determined by news outlets to inform their decisions. As the public opinion was in support of student-athlete compensation the NCAA made the best decision they could and other organizations should follow its lead. This next part of this thesis will discuss limitations of this study and provide concluding thoughts.
Chapter 6: Limitations and Conclusion

This study provided a foundation on a topic that has limited research, offering a basis upon which others can extend on to better help understand sports communication in news articles. A limitation of this study was the unequal amount of news articles during each time frame. While article collection before and after California Senate Bill 206 was almost even, after the NCAA policy was announced there was a noticeable decrease in news articles. This imbalance is likely due to the change in focus of the media because where the focus was previously on SB 206, it changed to specifically the NCAA as SB 206 was no longer spearheading the change of college athletics. Another limitation of this study was the database used for news article collection. While NewsBank Inc. was used because it was a credible database, it also limited the number of news articles that could be collected from a variety of news outlets. For example, this study only included three sport news outlets, and to further this study more sport outlets should specifically be examined as they likely have more stock in student-athlete compensation and knowledge of this issue. The media also tends to use binary frames, meaning that frames may not be exactly pro or anti compensation and can exist in varying degrees (Cawley, 2012), which is not accounted for in this study.

In regards to student-athlete compensation and California Senate Bill 206, three pro-compensation themes, exploitation of student-athletes, celebrity support, and “the NCAA system needs to change,” and five anti-compensation themes, need for distinction, bill is unfair, celebrity pushback, national issue, and SB 206 is unconstitutional, emerged from analyzing 157 news articles. Even though SB 206 passed and the NCAA changed its amateurism policy, the findings illustrate that anti-compensation framing strategies had more occurrences than pro-compensation framing strategies in all three time frames. While themes slightly evolved after the
bill passed, more substantial changes to framing strategies occurrences were seen after the NCAA policy announcement, where pro-compensation strategies were the least present. Finally, both local and national news outlets presented all themes and sub themes; however, sport outlets did not show all sub themes whereas mainstream outlets did.

To expand upon this study, researchers should examine other mediums from which news is acquired, such as social media, where many individuals use these platforms to receive information about current news and develop opinions based on what they read. While California Senate Bill 206 had the most support, other legislation from different states were also being pushed during the same time frame and should be examined to understand how framing strategies may differ. Many states duplicated California’s notion of being compensated for name, image and likeness; however, there were other states that pushed for more substantial changes to the NCAA’s amateurism ruling.

Framing strategies of news articles should be considered by sport organizations when facing an issue that is challenging its power. While it is often said that media reflects cultural norms and values, this study shows that while one side of framing strategies may prevail within the media, the other may ultimately control the narrative that is favored by the public. This study also proposes that media may not be as significant in decisions making and public opinion as it is thought to be. Sport organizations should do more research to get in front of opposition so that they can better control how its organization and the choices it is making in response to prominent issues are framed by media.
References


Anderson, B. (2019, October 1). California becomes first state to allow college athletes to be paid. Fresno Bee, The (CA), p. 1A.


Athletes have a right to be compensated, UC Davis should lead by example. (2019, October 10). California Aggie: University of California - Davis (CA).


Psychology, 3(2), 77-101.


Chemerinsky, E. (2019, September 8). Colleges make lots of money off sports, the athletes should, too. Sacramento Bee, The (CA), p. 3D.

elite environments. *Journal of Communication, 57*, 99-118. doi:
10.1111/j.1460-2466.2006.00331.x

10.1386/jams.4.3.315_1


Deklinski, L. (2019, October 2). State representatives to introduce bill allowing college athletes
to get fairly compensated. *News-Item, The (Shamokin, PA).*

De Leon, A. (2019, September 18). Wednesday Warmup: The assassination of California sports by the coward Mark Emmert. *Collegian, The: California State University-Fresno (CA).*


Editorial: Allow college athletes to profit from endorsements. (2019, September 23). *Norwalk Reflector (OH).*

Editorial: Let NCAA athletes get paid for endorsements. End the exploitation. (2019, September


https://doi-org.ezproxy.lib.vt.edu/10.4135/9781483384436


Halt NCAA bullying of state college athletes - Nonsensical ban on athletes profiting off their name, image or likeness must come to an end. (2019, July 2). *Lake County Record Bee (Lakeport, CA)*, p. 4.

Harvey, A. R. (2019, October 10). Black Student Athletes in California Can Now Say, 'Show Me The Money'. *L.A. Watts Times (Los Angeles, CA).*


Hess, A. (2019, September 11). Majority of college students say student-athletes should be paid, survey finds. *CNBC.*


Indrisano, E. (2019, October 10). The players have spoken: The NCAA system needs to change. *The Signal: Georgia State University (Atlanta, GA).*


Jansen, B. (2019, September 26). Potential player pay-day in NCAA. *Minaret, The: University of Tampa (FL).*

Johnson, R. (2019, April 5). Now politicians across the country are coming after the NCAA. *SB Nation.* Retrieved from https://www.sbnation.com/


Kaur, H. (2019, September 14). Former college basketball star who sued the NCAA says California’s fair pay bill is ‘changing the game’. *CNN*.


Martinez, F. (2019, September 14). California bill plans to give student-athletes right for financial compensation over their image. *Poly Post, The: California State Polytechnic University - Pomona (CA)*.


McLaughlin, E. C. (2019, October 2). California wants its college athletes to get paid, but the NCAA is likely to put up hurdles. *CNN*.


Morales, K. (2019, October 6). Governor Gavin Newsom asks NCAA to play fair and pay fair, student-athletes respond. *Orion, The: California State University - Chico (CA)*.

Mullenix, J. (2019, October 9). Overtime: California Senate Bill 206 and its implications on college sports. *Butler Collegian: Butler University (Indianapolis, IN)*.


Ruiz, N. (2019, October 1). Calif. to allow collegians to earn money. *Sun, The (Baltimore, MD)*,
Sanchez, M. J. (2019, September 13). California standing up to NCAA and it's about time someone did. *Orlando Sentinel, The (FL)*, p. 10A.


Setty, G. & Young, J. (2019, October 29). The NCAA will allow athletes to profit from their name, image and likeness in a major shift for the organization. Retrieved from


Sprecher, A. M. (2019, October 5). As NCAA digs in against new law allowing college athletes to profit from their likeness, Utah athletes, officials weigh in. *The Salt Lake Tribune*.


Wogenrich, M. (2019, October 8). 'Fair Pay to Play' sparks concern in LV One issue is the mindset of treating college athletes as businesses. *Morning Call, The (Allentown, PA)*, p. 1C.


Zeigler, M. (2019, October 1). Bill messes with fragile ecosystem of NCAA. *San Diego*
Appendix A

Before Bill Passed:


Anderson, B. (2019, February 6). College athletes could soon get paid in California, but not from the NCAA. Napa Valley Register (CA).


Berkowitz, S. (2019, September 30). California governor signs bill that makes it easier for college athletes to profit from name, likeness. USA Today.


Chemerinsky, E. (2019, September 8). Colleges make lots of money off sports, the athletes should, too. Sacramento Bee, The (CA), p. 3D.


Editorial: Allow college athletes to profit from endorsements. (2019, September 23). *Norwalk Reflector (OH).*


Edwards, M. (2019, September 30). JSU’s Grass not a fan of law allowing California college athletes to earn money from name, image. *Anniston Star, The (AL).*


Fretwell, B. (2019, September 30). The “Fair Pay to Play Act” and its effects on college athletics from top to bottom. *Clause, The: Azusa Pacific University (CA).*

Ghandeharizadeh, S. (2019, August 21). NCAA rules against compensating athletes are unfair. *Daily Trojan: University of Southern California (Los Angeles, CA).*


Gutierrez, M. & Fenno, N. (2019, September 12). Bill to allow college athletes to profit from endorsements sent to Newsom. *Sacramento Bee, The (CA),* p. 6B.

Halt NCAA bullying of state college athletes - Nonsensical ban on athletes profiting off their name, image or likeness must come to an end. (2019, July 2). *Lake County Record Bee (Lakeport, CA),* p. 4.


In brief: ‘Fair Pay to Play Act’ by Berkeley’s Skinner sent to Newsom. (2019, September 20). *East Bay Times (CA),* p. 5A.

Jansen, B. (2019, September 26). Potential player pay-day in NCAA. *Minaret, The: University of Tampa (FL).*

Kaur, H. (2019, September 14). Former college basketball star who sued the NCAA says California’s fair pay bill is ‘changing the game’. *CNN.*

Kim, A. (2019, September 11). California state assembly unanimously passes bill to allow college athletes to profit from endorsements. *CNN.*

Kim, A. (2019, September 30). California just passed a law that allows college athletes to get paid. *CNN.*


Martinez, F. (2019, September 14). California bill plans to give student-athletes right for financial compensation over their image. *Poly Post, The: California State Polytechnic University - Pomona (CA).*


Newman, L. (2019, September 25). Mark Emmert: California name and likeness bill proposal is ‘existential threat’ to NCAA. *USA Today.*


Poe, J. (2019, February 7). Poe’s Perspective: Proposed bill presents paying college athletes as a future possibility. *Daily Trojan: University of Southern California (Los Angeles, CA).*

Raychawdhuri, A. (2019, August 18). Student-athletes work and play hard and SB 206 will ensure they’re compensated. *Daily Bruin: University of California-Los Angeles (CA).*


Sanchez, M. J. (2019, September 13). California standing up to NCAA and it's about time someone did. *Orlando Sentinel, The (FL)*, p. 10A.


**After Bill Passed:**


Anderson, B. (2019, October 1). California becomes first state to allow college athletes to be paid. *Fresno Bee, The (CA).* p. 1A.

Athletes have a right to be compensated, UC Davis should lead by example. (2019, October 10). *California Aggie: University of California - Davis (CA).*


Blau, J. (2019, October 2). Miller weighs in on California bill. *Herald-Times (Bloomington, IN).*


Deklinski, L. (2019, October 2). State representatives to introduce bill allowing college athletes to get fairly compensated. *News-Item, The (Shamokin, PA).*


Dzvonczyk, J. (2019, October 29). NCAA votes to allow student-athletes to profit from name, image, likeness. *Daily Bruin: University of California-Los Angeles (CA).*


Gallaudet, B. (2019, October 3). Bruce Gallaudet: California sparks might ignite pay-for-play firestorm. *Davis Enterprise, The (CA).*

University News: St. Louis University (MO).
Harris Jr., J. (2019, October 4). Senate Bill 206 will provide college athletes with a financial boost. Austin Villager, The (TX), p. 3.
Indrisano, E. (2019, October 10). The players have spoken: The NCAA system needs to change. The Signal: Georgia State University (Atlanta, GA).
Jardy, A. (2019, October 3). Big Ten's Delany frowns on 'fair pay' law. Columbus Dispatch, The (OH), p. 9D.
Martinez, F. (2019, October 29). NCAA to allow student-athletes to profit off of name, image and likeness rights. Poly Post, The: California State Polytechnic University - Pomona (CA).
McLaughlin, E. C. (2019, October 2). California wants its college athletes to get paid, but the NCAA is likely to put up hurdles. CNN.
Morales, K. (2019, October 6). Governor Gavin Newsom asks NCAA to play fair and pay fair,
student-athletes respond. *Orion, The: California State University - Chico (CA).*


Mullenix, J. (2019, October 9). Overtime: California Senate Bill 206 and its implications on college sports. *Butler Collegian: Butler University (Indianapolis, IN).*

Murphy, C. (2019, October 9). College Athletes Deserve Compensation. *Emory Wheel, The: Emory University (Atlanta, GA).*


*Daily Democrat, The (Woodland, CA), p. 1.*


Rachac, G. (2019, October 10). Opinions, questions diverse in Big Sky Conference over California’s ‘Fair Pay to Play Act’. *Billings Gazette, The (MT).*


Rowland, K. (2019, October 2). OHIO STATE FOOTBALL; Smith has issues with California's Senate bill; OSU athletic director against 'unlevel' field. *Blade, The (Toledo, OH), p. C1.*


Shegerian & Associates: California Will Now Allow College Athletes To Profit From Endorsement Deals. (2019, October 4). *PR Newswire (USA).*


Smoot, D. (2019, October 1). Herman, Ehlinger respond to SB 206. *Daily Texan, The: University of Texas at Austin (TX).*

Sparks, M. (2019, October 13). Will NCAA adapt to California law?. *Daily Independent, The (Ashland, KY).*
Sprecher, A. M. (2019, October 5). As NCAA digs in against new law allowing college athletes to profit from their likeness, Utah athletes, officials weigh in. *The Salt Lake Tribune.*


Tensley, B. (2019, October 1). How California is trying to right the NCAA’s skewed hierarchy. *CNN.*


Vega, J. (2019, October 2). Column: California’s ‘Fair Pay to Play’ bill threatens the stability of college athletics. *Shorthorn, The: University of Texas - Arlington (TX).*


Wiggins, M. (2019, October 1). Sac State athletes have mixed opinions on Senate Bill 206 becoming law. *State Hornet, The: California State University-Sacramento (CA).*

Wilner, J. (2019, October 1). The fair pay to play act - a look at both sides- the showdown we’ve waited for, Californioa vs. the NCAA, is here. *East Bay Times (CA)*, p. 1A.

Wogenrich, M. (2019, October 8). 'Fair Pay to Play' sparks concern in LV One issue is the mindset of treating college athletes as businesses. *Morning Call, The (Allentown, PA)*, p. 1C.


**After NCAA Policy Announcement:**


Burleyson, N. (2019, November 18). State bills pressure NCAA to change ways. *DePaulia, The: DePaul University (Chicago, IL).*


Hayes, E. (2019, November 4). Name, image and likeness should be embraced, not dismissed by fans. *Daily Item, The (Sunbury, PA).*

Lima, R. (2019, October 30). NCAA Allows Student-Athletes To Profit From Their Likeness. *Old Gold and Black: Wake Forest University (Winston-Salem, NC).*


