



KALAMAZOO COLLEGE
PUBLIC INFRACTIONS DECISION
March 22, 2016

I. INTRODUCTION

The NCAA Division III Committee on Infractions is an independent administrative body comprised of individuals from the NCAA Division III membership and the public charged with deciding infractions cases involving member institutions and their staffs. This case involves Kalamazoo College.¹ The institution, NCAA enforcement staff and head baseball coach are the parties in this case. The committee considered this case through the cooperative summary disposition process in which all parties agree to the primary facts and violations, as fully set forth in the Summary Disposition Report (SDR). The institution contested the committee's proposed prohibition of postseason competition for any sport program whose roster contained student-athletes continuing to receive impermissible aid. Therefore, the institution has the opportunity to appeal that penalty.

This case centered on financial aid violations that occurred over five years as a result of the institution's failure to remove athletics considerations from a matrix-rating system used for admissions and later in the packaging of financial aid. Specifically, the institution used a matrix-rating for the admission and formulating of financial aid for incoming students. The rating could be influenced by athletics components identified by prospective students, as well as recommendations from athletics and coaching staff members. In total, 567 prospective student-athletes had athletics components considered when the institution packaged their financial aid. The institution also agreed that it failed to monitor the formulating of financial aid packages over the time period. The parties agreed and the committee concludes that the violations are major.

Additionally, the institution, head baseball coach and the enforcement staff agreed that the head baseball coach sent 29 prospective student-athletes an email detailing the financial aid process and representing his ability to influence aid packages. Originally, the institution and head baseball coach believed the violation could be secondary. The committee concludes that the violation is major.

After considering all relevant factors, the committee accepted the parties' factual agreements and that violations occurred. The committee adopts and prescribes the following penalties: a three-year probationary period; competition restrictions for sport programs that continue to include student-athletes receiving impermissible aid; NCAA Regional Rules attendance; increased rules

¹ A member of the Michigan Intercollegiate Athletic Association, the institution's total enrollment is 1,446. The institution sponsors nine men's sports and nine women's sports. This is the institution's first major infractions case.

education and monitoring of the baseball program's recruiting communications and administrative reporting requirements.

II. CASE HISTORY

In April 2014, the Michigan Intercollegiate Athletic Association informed the institution that other conference members reported that it potentially committed NCAA violations in the baseball program. The conference office requested that the institution develop an investigative plan. On May 12, 2014, the institution submitted an investigative plan. Later that month, the conference referred the matter to the enforcement staff and the conference permitted the institution to begin an internal investigation.

On June 25, 2014, the institution submitted preliminary findings to the enforcement staff. After a request for additional information, the institution submitted additional findings on July 28, 2014. On September 11, 2014, the enforcement staff provided the institution with a written notice of inquiry and later, at the institution's request, a verbal notice of inquiry. Beginning in September 2014, the institution and the enforcement staff began a cooperative investigation. On July 16, 2015, the enforcement staff submitted a draft notice of allegations to the institution and the head baseball coach (head baseball coach). On August 21, 2015, the institution and the head baseball coach agreed to process the case via summary disposition. On October 20, 2015, the parties submitted the SDR to the committee.

On November 24, 2015, the committee reviewed the SDR. On December 1, 2015, the committee proposed additional penalties to the institution. On December 4, 2015, the institution sought a clarification on the committee's proposed prohibition from postseason competition. On December 8, 2015, the committee provided further information related to the proposed penalty. On December 21, 2015, the institution requested an expedited hearing to contest the committee's proposed prohibition. On March 1, 2016, the committee conducted an expedited hearing pursuant to NCAA Bylaw 32.7.1.4.3.

III. PARTIES' AGREEMENTS

A. PARTIES' AGREED-UPON FACTUAL BASIS AND VIOLATIONS OF NCAA LEGISLATION

The parties jointly submitted a SDR that identified the agreed-upon factual basis violations and of NCAA legislation. The SDR identified:

1. [NCAA Division III Manual Bylaws 15.4.1-(a), 15.4.5 and 15.4.6 (2010-11 through 2014-15)]

The institution and NCAA enforcement staff agreed that between at least the fall of 2009 and fall of 2014, the institution used a matrix rating system that considered athletics leadership, ability and participation or performance information provided by athletics department coaches and then prospective students, including then prospective student-athletes, applying for admission to the institution when evaluating those individuals for admission, and failed to exclude athletics consideration from the matrix when those ratings were also used in creating those students' and student-athletes' financial aid packages. Specifically, the institution's admission staff considered athletics information included in then prospective students', including then prospective student-athletes', applications for admission and Athletic Recruit Rating Sheets submitted by coaches, which contained athletics information about then prospective student-athletes applying to the institution and graded the prospects' athletic abilities, when using the institution's matrix rating system during the financial aid packaging process for approximately 567 student-athletes who matriculated at the institution and are currently participating or previously participated in all but one of the institution's sport programs.

[The number of student-athletes and sport programs involved is in Appendix One.]

2. [NCAA Division III Manual Bylaw 13.2.1 (2012-13)]

The institution, the head baseball coach and the NCAA enforcement staff agree that between June and September 2013, the head baseball coach represented to then baseball prospective student-athletes that he had the ability to influence an increase in the amount of financial aid that baseball student-athletes received from the institution. Specifically, the head baseball coach sent recruiting correspondence in the form of an email to approximately 29 then prospective student-athletes that stated the institution's admission office would increase the prospects' merit-based financial aid based on his written recommendation. This action amounted to an impermissible offer of financial aid.

3. [NCAA Constitution 2.8.1 (2010-11 through 2014-15)]

The institution and NCAA enforcement staff agreed that the scope and nature of Violation No. 1 demonstrated that the institution failed to adequately monitor the awarding of financial aid to ensure that student-athlete financial aid packages were based solely on criteria having no relationship to athletics leadership, ability and participation or performance. Specifically, the institution failed to ensure that appropriate monitoring policies and procedures were in place to preclude athletics criteria from influencing the financial aid packaging process for approximately 567 student-athletes, during at least a five-year period, and admission and financial aid and athletics department staff received adequate education about NCAA financial aid legislation.

IV. REVIEW OF CASE

A. Agreed-Upon Violations

The submitted SDR fully details the parties' positions in the infractions case and includes the agreed-upon primary facts and violations. After reviewing the parties' principal factual agreements and the respective explanations surrounding those agreements, the committee accepts the parties' SDR and concludes that the facts constitute three major violations of NCAA legislation. The major violations include the institution's impermissible consideration of athletics criterion when formulating prospective student-athletes' financial aid packages and the institution's failure to monitor its awarding of financial aid. Further, the institution and head baseball coach committed another major violation when he distributed an email to 29 prospective student-athletes that represented he could influence their financial aid awards.

The institution agreed that it committed a major violation when it considered athletics criteria in formulating 567 prospective student-athletes' financial aid packages. The institution's process for awarding financial aid violated NCAA Bylaw 15.

NCAA Bylaw 15.4.6 requires institutions that use a matrix-rating system for admitting prospective students to remove any consideration of athletics criteria from consideration when reviewing student-athletes' application for financial aid. Similarly, NCAA Bylaw 15.4.1-(a) and 15.4.5 prohibit institutions from considering athletics criteria and athletics staff members' involvement in the formulating of financial aid packages.

From fall 2009 through fall 2014, the institution violated all three provisions of NCAA Bylaw 15 when it awarded financial aid that included consideration of athletics criterion to 567 student-athletes. The institution utilized a matrix-rating system for all students' admission to the institution, which could be enhanced by applicants' self-identified co-curricular activities. Co-curricular activities included applicants' involvement in activities outside academics, including athletics. Additionally, applicants' co-curricular scores could be enhanced from Athletic Recruit Rating Sheets, submitted by athletics department coaches. After granting admission, the institution utilized the same matrix-rating when formulating financial aid packages. Failing to remove the athletics components prior to formulating financial aid packages violated NCAA Bylaw 15.4.6. This failure resulted in 567 student-athletes receiving financial aid that included athletics criterion, violating NCAA Bylaw 15.4.1-(a). Additionally, when the institution permitted athletics staff members to submit ratings that were considered in the matrix-rating it violated NCAA Bylaw 15.4.5. The committee concludes that the violations are major.

With respect to the head baseball coach, the parties agreed that he sent an email to 29 prospects that amounted to an offer of financial aid. His conduct violated NCAA Bylaw 13 and did not meet the requirements for a secondary violation.

NCAA Bylaw 13.2.1 prohibits institutional staff members from offering to give any financial aid. NCAA Bylaw 19.02.2.1 defines a secondary violation as (1) isolated or inadvertent; (2) provides or is intended to provide only a minimal advantage; and (3) does not include any significant benefits.

The parties agreed that the head baseball coach sent an email to 29 prospects detailing the institution's financial aid process. The email acknowledged that coaches had the ability to write a recommendation to the admissions office that could give prospects a bump in merit-based scholarships. While the institution and head baseball coach took the position that the email was intended to be informative and detail the financial aid process, they acknowledged it could be interpreted as a written offer of aid. The institution and head baseball coach believed, however, the violation could be considered secondary. Because the head baseball coach sent the email to 29 prospective student-athletes over a four-month period, his conduct was neither isolated nor inadvertent. Similarly, the head baseball coach's conduct was, at least in part, motivated for a recruiting purpose. Even if informational, his conduct intended to identify the advantages of a head coach writing a recommendation on behalf of the recruits that would give them a "bump" in a portion of their merit based scholarships. Therefore, the committee concludes that his conduct constitutes a major violation of NCAA Bylaw 13.2.1.

Finally, the institution agreed that from the fall 2009 through the fall 2014 it failed to monitor its awarding of financial aid. As a result, the institution permitted 567 student-athletes to receive impermissible financial aid. The institution's failure to monitor violated NCAA Constitution 2.

NCAA Constitution 2.8.1 requires member institutions to monitor their athletics programs to assure compliance with NCAA rules and regulations. It also requires institutions to identify rules violations and report any violations to the Association.

The school mistakenly believed that so long as all prospective students were treated the same, regardless of their interest in athletics, the institution complied with NCAA legislation and the Division III philosophy. The institution misunderstood NCAA Bylaw 15 and the Division III philosophy. As a result, it permitted over 500 student-athletes to receive impermissible financial aid and failed to fulfill its obligations under NCAA Constitution 2.8.1. The committee concludes that the institution's failure to monitor is a major violation.

B. Contested Penalty

After accepting the facts and violations in the SDR, the committee proposed a prohibition from postseason competition for sport programs whose rosters continue to include one or more student-athletes with impermissible aid. The proposed penalty applied to all current student-athletes whose financial aid packages included the consideration of athletics criteria. The institution challenged the proposed penalty. At the expedited hearing, the institution acknowledged that the committee had the authority to prescribe the prohibition and had previously prescribed the penalty in financial aid cases. The institution claimed, however, that

based on the detrimental impact the penalty would have on the estimated 240 current student-athletes who continue to receive impermissible aid and the potential financial impact the penalty could have on the institution as a whole, the penalty was unwarranted. Consistent with past infractions cases, the committee determines that the prohibition from postseason competition penalty is appropriate.

The committee prescribes the prohibition for two primary reasons: (1) it is consistent with the committee's past cases and (2) the penalty's application provides the institution with the choice of serving postseason prohibitions or repackaging impermissible financial aid packages.

The institution acknowledged that the committee has consistently applied a prohibition from postseason competition if institution's permit student-athletes to maintain impermissible financial aid packages. *See Emory and Henry* (2015) (prescribing, among other penalties, a postseason prohibition after the institution provided 27 student-athletes with financial aid packages that included athletics considerations and two representatives of the institution's athletics interest were involved in the financial aid awarding process for two football student-athletes); *Utica College* (2013) (prescribing, among other penalties, a postseason prohibition penalty after the institution provided 15 of 16 awarded international student awards to men's hockey student-athletes); *Manhattanville College* (2012) (prescribing, among other penalties, a postseason prohibition when the institution provided incoming international men's hockey student-athletes with financial aid packages larger than those who did not participate in athletics); *Neumann University* (2012) (prescribing, among other penalties, a postseason prohibition when the institution provided 118 of 119 grants or renewals of a its Canadian International Student Award to student-athletes); and *Morrisville State College* (2012) (prescribing, among other penalties, a postseason prohibition when the institution provided two different international grant awards to Canadian men's hockey student-athletes at a distinguishable rate than the general student body).

This case does not require a different result. Rather, consistent with previous cases and the institution's unwillingness to correct the aid packages by repackaging the impacted student-athletes' impermissible financial aid, the prohibition penalty is particularly appropriate. The penalty is applicable considering the number of student-athletes involved (567) and the length of time the violations occurred (five years), which far exceeds any of the previous cases. At the expedited hearing, the institution cited *University of Wisconsin, Superior* as a similar case in which the committee did not prescribe a postseason prohibition. *University of Wisconsin, Superior* (2014) (concluding that the institution violated NCAA financial aid legislation when over five academic years it awarded 196 scholarships worth \$393,575 to 110 student-athletes). A postseason prohibition would have been inappropriate in *University of Wisconsin, Superior* because once the institution discovered the violations it immediately amended the scholarship forms and ceased awarding improper aid. *University of Wisconsin, Superior* at 9.² The case did

² Although not necessarily clear in the infractions decision, the case involved scholarship forms identifying the scholarships as yearly awards, presumably filled out on an annual basis. Therefore, when the institution identified the violations and immediately correct the scholarship form, it prevented any current student-athletes from receiving future impermissible aid.

not present itself as involving continued impermissible aid, as does this case. But even if that case did involve student-athletes continuing to receive impermissible financial aid, it is one case out of a number of cases and does not dictate a different result.

With respect to the application of the proposed penalty, the committee provides the institution with the choice of continuing to award impermissible aid and serving a prohibition from postseason competition in the sport programs where those student-athletes compete or preserving applicable sport programs' postseason opportunities by repackaging aid in a manner consistent with NCAA bylaws and the Division III philosophy. To date, the institution has chosen the former, essentially choosing to continue to violate NCAA legislation and the Division III philosophy by issuing impermissible financial aid to current student-athletes. Based on this decision, it would be inappropriate to permit the institution to realize the benefit of providing current student-athletes with ongoing impermissible aid and subsequently compete in postseason competition. Other institutions are not afforded this financial aid benefit. Therefore, permitting the institution to award impermissible aid and subsequently compete in the postseason would unfairly reward the institution for its NCAA violations – an inappropriate result.

The NCAA membership has entrusted this committee to prescribe appropriate penalties to offset any impermissible benefit gained. Therefore, in accordance with the committee's recognized authority and past cases, the committee determines that the prohibition penalty remains appropriate. The application and effect of that penalty, however, rests with the institution, as it did with the previous five institutions who also received the prohibition.

This is the fourth matrix-rating decision released by the committee. In each of those cases, the committee has consistently expressed its expectations to comply with NCAA legislation relating to member institutions' administration of financial aid. Since 2011, the committee has reviewed 16 financial aid cases and released infractions decisions intended to guide and educate the Division III membership. In those decisions, the committee has repeatedly cautioned institutions about the proper administration of financial aid. At the highest level, the committee expects prospective student-athletes' financial aid packages to be free from any athletics influence. It is particularly important for institutions utilizing a matrix-rating system for admissions and financial aid to develop proper safeguards aimed at ensure NCAA financial aid legislation. Institutions must ensure proper systems and communication exists between the admissions and financial aid offices to remove any and all athletics considerations prior to the packaging of prospective student-athletes' financial aid. This is a shared institutional responsibility and a membership expectation.

V. PENALTIES

For the reasons set forth in Sections III and IV of this decision, the committee concluded that this case involved major violations of NCAA legislation. The institution committed major infractions when it failed to remove athletics criteria from 567 student-athletes financial aid packages, the

head baseball coach's email to 29 prospects suggesting that he could influence merit-based scholarships and the institution's failure to monitor the awarding of financial aid.³

In prescribing the penalties, the committee considered the institution's cooperation in the processing of this case. Cooperation during the infractions process is addressed in NCAA Bylaws 19.01.3 and 32.1.4. The committee concluded that the cooperation exhibited by the institution was consistent with its obligation under the bylaws with respect to processing the case. As the institution agreed to the factual findings and violations, there is no opportunity to appeal any of the underlying facts or violations. The institution, in addition to the self-imposed penalties, agreed to most of the committee's proposed additional penalties. There is therefore no opportunity to appeal those penalties. Because the institution contested the committee's proposed prohibition from postseason competition for programs whose rosters included student-athletes receiving impermissible aid, it has the opportunity to appeal that penalty.

The institution's self-imposed penalties are specifically identified. The institution's corrective actions are contained in Appendix Two. The committee prescribed the following penalties.

Penalties and Disciplinary Measures (NCAA Bylaw 19.5.2)

1. Public reprimand and censure.
2. Three years of probation from March 22, 2016, through March 21, 2019.⁴
3. Effective immediately, any of the institution's athletics teams whose rosters include one or more student-athletes presently receiving financial aid that included athletics involvement as a criterion at the time the funds were awarded shall end their seasons with the playing of their last regularly scheduled, in-season contest and shall not be eligible to participate in any postseason competition, including conference tournaments and NCAA championships. Further, any affected teams shall not be eligible for regular season conference championship consideration for as long as their rosters include student-athletes receiving financial aid that included athletics criteria at the time the scholarship was awarded.

³ Historically, the committee would vacate all postseason wins. The committee also has the bylaw authority to vacate all wins by the institution in which ineligible student-athletes competed. However, the committee is unable to do so in this case. Due to noncontroversial legislation adopted by the Division III Management Council in June 2014, student-athletes who received impermissible financial aid, but were unaware that they received improper financial aid, were not deemed ineligible and would not need to seek reinstatement. Noncontroversial legislation is immediately effective after it is adopted. The noncontroversial legislation was subsequently referred back to committee for a broader discussion at the NCAA Convention in January 2015. The result is the legislation was no longer effective as of January 17, 2015. However, the noncontroversial legislation applies to the institution and those involved in cases initiated during the effective period of the noncontroversial legislation. There is no indication that any of the student-athletes were aware that they were receiving impermissible financial aid. Therefore, the committee cannot prescribe a vacation penalty.

⁴ The institution proposed a two-year probationary period. The authority to prescribe NCAA probation rests solely with the committee. Due to the number of student-athletes (567) involved in this case, the panel prescribes a three-year probationary period.

The Division III Committee on Infractions has consistently applied this penalty to institutions who have not repackaged financial aid awards to remove any athletics considerations and continue to allow student-athletes to receive those awards and compete for the institution. See *Emory and Henry College* (2015); *Utica College* (2013); *Manhattanville College* (2012); *Neumann University* (2012); and *Morrisville State College* (2012).

4. During the first and third years of the institution's probationary period, the institution shall request a Level II review from the NCAA Committee on Financial Aid and abide by all recommendations made by the reviewer.⁵
5. The director of athletics and the head baseball coach attended the 2014 NCAA Regional Rules Seminar. During the period probation, the institution annually will send at least one admission or financial aid staff member and at least one head coach in the athletics department to an NCAA Regional Rules Seminar. Information obtained at the seminars will be used to enhance the comprehensive rules education efforts. (Institution imposed.) In addition to the admissions and financial aid staff members and designated head coach, the head baseball coach and a senior athletics administrator shall attend at least one additional NCAA Regional Rules Seminar during the probationary period.
6. As a result of his involvement in Violation No. 2, a letter of reprimand has been placed in the personnel file for the head baseball coach, further during the institution's period of probation in this case any email (or other electronic communication) in the sport of baseball to a group of prospective student-athletes and/or their families must receive prior approval from the director of athletics. (Institution imposed.) Additionally, and as part of the institution's on-going rules education and monitoring efforts, the institution shall be required to provide the head baseball coach and his staff with individual monthly rules education sessions. In these education sessions, the institution shall be required to review all of the baseball program's recruiting communications with prospective student-athletes. The institution shall be required to maintain a record of these communications and report out on them in the institution's annual compliance reports.
7. During this period of probation, the institution shall:
 - a. Continue to develop and implement a comprehensive educational program on NCAA legislation to instruct coaches, the faculty athletics representative, all athletics department personnel and all institution staff members with responsibility for certification of student-athletes' eligibility for admission, financial aid, practice or competition;

⁵ In conjunction with the institution's proposed two-year probationary period, the institution proposed a Level Two review in each year of probation. The committee accepts the institution's proposal, but in light of the committee's proposed three-year probationary period, requires that the Level Two reviews be conducted in the first and last years of the probationary period.

- b. Submit a preliminary report to the Office of the Committees on Infractions by May 15, 2016, setting forth a schedule for establishing this compliance and educational program;
 - c. File with the Office of the Committees annual compliance reports indicating the progress made with this program by January 31 of each year during the probationary period. Particular emphasis should be placed on monitoring the institution's financial aid awarding process and recruiting communications. The reports must also include documentation of the institution's compliance with the penalties adopted and prescribed by the committee;
 - d. Inform prospective student-athletes in the affected sports programs that the institution is on probation for three years and detail the violations committed. This information must be provided in writing and for the full term of probation. The institution must provide this information as soon as practicable after the prospective student-athlete is recruited pursuant to NCAA Bylaw 13.02.8 and, in all instances, before the prospective student-athlete signs a financial aid agreement or initially enrolls at the institution, whichever is earlier;
 - e. For the full term of probation, publicize specific and understandable information concerning the nature of the infractions by providing, at a minimum, a statement to include the types of violations and the affected sport program and a direct, conspicuous link to the public infractions decision located on the athletic department's main webpage. The information shall also be included in institutional media guides and in an alumni publication. The institution's statement must: (i) clearly describe the infractions; (ii) include the length of the probationary period associated with the major infractions case; and (iii) give members of the general public a clear indication of what happened in the major infractions case to allow the public (particularly, prospective student-athletes and their families) to make informed, knowledgeable decisions. A statement that refers only to the probationary period with nothing more is not sufficient. The institution may meet its responsibility in a variety of ways.
8. Following the receipt of the final compliance report and prior to the conclusion of probation, the institution's president shall provide a letter to the committee affirming that the institution's current athletics policies and practices conform to all requirements of NCAA regulations.
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As required by NCAA legislation for any institution involved in a major infractions case, Kalamazoo College shall be subject to the provisions of NCAA Bylaw 19.5.2.3, concerning repeat violators, for a five-year period beginning on the effective date of the penalties in this case, March 22, 2016. Further, the committee advises the institution that it should take every precaution to ensure that it observes the terms of the penalties. The committee will monitor the penalties during their effective periods. Any action by the institution contrary to the terms of any of the penalties or any additional violations will cause the committee to consider extending the institution's probationary period, prescribing more severe penalties, or may result in additional allegations and violations.

NCAA COMMITTEE ON INFRACTIONS

Dave Cecil

Amy Hackett, chair

Tracey Hathaway

Gerald Houlihan

Gerald Young

APPENDIX ONE

**BREAKDOWN OF AFFECTED SPORT PROGRAMS AND NUMBER OF
STUDENT-ATHLETES INVOLVED IN VIOLATION NO. 1 IDENTIFIED IN
THE OCTOBER 20, 2015, SUMMARY DISPOSITION REPORT (SDR)**

Sport	Number of Student-Athletes
Baseball	66*
Football	139*
Men's basketball	26*
Men's cross country	18*
Men's golf	15
Men's lacrosse	0
Men's soccer	39*
Men's swimming and diving	32*
Men's tennis	18
Softball	25
Women's basketball	28*
Women's cross country	32*
Women's golf	10
Women's lacrosse	24*
Women's soccer	42*
Women's swimming and diving	33
Women's tennis	19
Women's volleyball	23

*Note: Twenty-two of the 567 student-athletes identified in Violation No. 1 participated in two different sports, which impacted the numbers listed in the chart.

APPENDIX TWO

**CORRECTIVE ACTIONS AS IDENTIFIED IN THE OCTOBER 20, 2015,
SUMMARY DISPOSITION REPORT (SDR)**

1. Any consideration of athletics participation in the admissions process is excluded from the data forwarded to the financial aid office. With regard to the Affinity Index, beginning with the 2014-15 academic year, the entire co-curricular component (which included consideration of athletics participation and leadership) of the index is excluded from the information sent to the financial aid office. Accordingly, information about athletics skill or participation is not considered or included in the decision process for awarding financial aid.
2. The college evaluated the office coordinator position in the athletics department to administrative assistant, which includes with it specific NCAA compliance responsibilities. The position also was expanded to a full-time, 12-month position, and the individual attended a June 2015 NCAA Regional Rules Seminar.
3. The violations and related issues of this case have been and will continue to be used as part of a comprehensive rules-education and training effort with those individuals at the college who are involved in the administration of financial aid, admissions and intercollegiate athletics. At monthly athletics staff meetings, there is a session on rules education. These sessions serve to reinforce the college's compliance expectations, policies and procedures, as well as to provide specific educational information with respect to conference and NCAA rules, including those related to financial aid.
4. The college conducted a two-hour training session for athletics department staff and coaches in September 2014 regarding admissions and financial aid policies and procedures. On September 10, 2015, training on NCAA admission and financial aid rules compliance was again conducted and included staff from athletics and from the admissions and financial aid offices. Such training will occur annually at the beginning of each academic year.
5. The college hired a consultant to conduct a comprehensive Division III rules compliance audit in winter 2015. Recommendations made in this audit are being addressed and implemented.