



**CENTRAL STATE UNIVERSITY
PUBLIC INFRACTIONS DECISION
MARCH 4, 2016**

I. INTRODUCTION

The NCAA Division II Committee on Infractions is an independent administrative body of the NCAA comprised of individuals from the Division II membership and the public. The committee decides infractions cases involving member institutions and their staffs. This case involved Central State University and centered on the institution's overall lack of control over its athletics program.¹

The case involved amateurism, eligibility, financial aid and playing and practice season violations stemming from the institution's lack of control. 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 committee proposed additional penalties to the institution. The institution agreed to those penalties; therefore, there is no opportunity to appeal.

The institution agreed that from the 2010-11 through the 2014-15 academic years, it failed to exercise appropriate control over the administration of its athletics program. Because of its overall failure, the institution agreed that it permitted additional major and secondary violations to occur. Those violations involved amateurism, eligibility, playing and practice season and financial aid. Those violations further demonstrate the institution's overall lack of control, a major violation.

The institution agreed that amateurism violations occurred from the 2010-11 through 2014-15 academic years when it failed to verify the amateurism status for 106 student-athletes in 10 sports. The institution also permitted those student-athletes to compete and receive travel expenses. The committee concludes that the violation is major.

Originally, the institution agreed that it committed three major eligibility violations during the 2010-11 and 2011-12 academic years when it permitted three student-athletes to compete and receive travel expenses when they were ineligible. The institution did not require a transfer student-athlete to serve a required year in residence. It also permitted a second student-athlete to participate after completing his tenth full-time semester. Finally, the institution permitted a third

¹ A member of the Southern Intercollegiate Athletic Conference, the institution has an enrollment of approximately 1,700 students. It sponsors four women's and four men's sports. At the time of the agreed-upon violations, the institution also sponsored men's and women's tennis. The institution became an NCAA member institution beginning in the 2008-09 academic year. This is the institution's first major infractions case.

student-athlete to participate when he failed to meet progress-toward-degree requirements. The committee concludes that cumulatively the three instances amount to one major violation.

Regarding playing and practice seasons, the institution agreed that during the 2013-14 academic year it committed a countable athletically related activity (CARA) violation. The institution failed to maintain accurate CARA logs for five sport programs. The committee concludes that the violation is major.

The institution also agreed that, during the 2013-14 academic year, it allowed a financial aid violation to occur. The institution failed to divide athletically related aid equally across four multisport participants when their aid agreements did not specify how the aid should be counted. The aid did not exceed any grant-in-aid limits. The committee concludes that the violation is secondary.

The committee accepts the parties' factual agreements and that violations occurred in this case. After considering all relevant factors, the committee concludes that major and secondary violations occurred. The committee adopts and prescribes the following penalties: a three-year probationary period; a financial penalty; vacation of records; an audit; NCAA Regional Rules attendance and administrative reporting requirements.

II. CASE HISTORY

On December 1, 2011, the institution joined the Great Midwest Athletic Conference (G-MAC). On October 3, 2013, the G-MAC commissioner contacted the institution's president about potential violations. On November 12, 2013, the institution informed the conference and the NCAA enforcement staff of certification violations. One week later, the institution retained outside counsel and began an internal investigation. On January 24, 2014, the institution reported violations to the enforcement staff and on March 3, 2014, provided the enforcement staff with a self-report.

On June 25, 2014, the enforcement staff provided the institution a written notice of inquiry and over the next nine months conducted interviews and requested documents from the institution. On May 19, 2015, the enforcement staff discussed proposed allegations with the institution. On June 2, 2015, the parties agreed to process the case through summary disposition. On November 13, 2015, the parties jointly submitted the SDR to the Division II Committee on Infractions.

On December 15, 2015, the committee reviewed the SDR. On December 17, 2015, it requested additional information, proposed amending three independent violations into one major violation and proposed reclassifying one violation as secondary. On January 7, 2016, the parties provided the additional information and agreed to the committee's proposed changes. On January 11, 2016, the committee proposed additional penalties to the institution. On January 14, 2016, the institution accepted the proposed penalties.

III. PARTIES' AGREEMENT

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

The parties jointly submitted an SDR that identifies an agreed-upon factual basis and violations of NCAA legislation. The SDR identifies:

1. [NCAA Division II Manual Bylaws 12.1.1 and 16.8.1.2 (2010-11 through 2014-15)]

The institution and NCAA enforcement staff agree that from the 2010-11 through 2014-15 academic years, the institution violated NCAA amateurism legislation by failing to properly determine the validity of the amateurism of 106 student-athletes for competition on 10 teams. Additionally, the institution provided actual and necessary travel expenses to these student-athletes, even though they were ineligible for intercollegiate competition. Specifically:

- a. From the 2010-11 through 2013-14 academic years, 64 student-athletes competed in football, men's basketball, men's cross country, men's tennis, men's track and field, women's basketball, women's cross country, women's tennis, women's track and field and women's volleyball prior to receiving amateurism certification from the NCAA Eligibility Center. Prior to having their amateurism certified, the institution provided actual and necessary travel expenses to the identified student-athletes, even though they were ineligible for intercollegiate competition.
- b. From the 2010-11 through 2013-14 academic years, eight transfer student-athletes competed in football, men's track and field, women's cross country and women's track and field prior to receiving amateurism certification from the Eligibility Center. Prior to having their amateurism certified, the institution provided actual and necessary travel expenses to the identified student-athletes, even though they were ineligible for intercollegiate competition.
- c. From the 2010-11 through 2013-14 academic years, 33 multisport student-athletes competed in football, men's cross country, men's tennis, men's track and field, women's cross country, women's tennis, women's track and field and women's volleyball prior to receiving amateurism certification from the Eligibility Center in those specific sports. Prior to having their amateurism certified, the institution provided actual and necessary travel expenses to the identified student-athletes, even though they were ineligible for intercollegiate competition.

- d. During the 2014-15 academic year, one women's track and field student athlete competed prior to receiving amateurism certification from the Eligibility Center. Prior to having her amateurism certified, the institution provided actual and necessary travel expenses to her, even though she was ineligible for intercollegiate competition.

2. [NCAA Division II Manual Bylaws 14.5.1 and 16.8.1.2 (2010-11)]²

The institution and NCAA enforcement staff agree that during the 2010-11 academic year, the institution violated NCAA eligibility legislation by permitting a transfer student-athlete to compete and receive travel expenses before completing one full academic year of residence at the institution. Specifically, a football student-athlete originally competed at a Division I institution during the 2006-07 academic year. The football student-athlete transferred to another Division I institution in the 2007-08 academic year and competed in 2008-09 and 2009-10. When the football student-athlete transferred to the institution in the summer of 2010, he did not satisfy any exceptions to the year of residence requirement and was therefore ineligible to compete and receive travel expenses with the football team during the fall of 2010.

3. [NCAA Division II Manual Bylaws 14.2.2 and 16.8.1.2 (2011-12)]

The institution and NCAA enforcement staff agree that during the 2011-12 academic year, the institution violated NCAA eligibility legislation by permitting a multisport student-athlete to engage in a season of participation following his first 10 semesters of full-time enrollment and provided Lewis with actual and necessary travel expenses, even though he was ineligible for intercollegiate competition. Specifically, the multisport student-athlete completed one full-time semester at a two-year institution prior to transferring to the institution for the 2007-08 academic year. From the 2007-08 through 2011-12 academic years, the multisport student-athlete completed 10 full-time semesters at the institution, competing with the football team for three seasons from 2009-10 through 2011-12 and the men's track and field team for one season in 2011-12. Because the multisport student-athlete completed his 10th full-time semester in the fall of 2011, he had exhausted his eligibility for competition, but still competed with the men's track and field team during the 2012 spring season and received actual and necessary travel expenses.

4. [NCAA Division II Manual Bylaws 14.4.1, 14.4.3 and 16.8.1.2 (2011-12)]

The institution and NCAA enforcement staff agree that during the spring of 2012, the institution violated progress-toward-degree legislation by permitting a men's indoor and outdoor track and field student-athlete to compete while academically ineligible. Additionally, the institution provided actual and necessary travel expenses even though he was ineligible for competition.

² The committee proposed and the parties accepted that agreed-upon Violation Nos. 2 through 4 cumulatively amount to one major violation.

5. [NCAA Division II Manual Bylaw 15.5.3.1 (2013-14)]³

The institution and NCAA enforcement staff agree that during the 2013-14 academic year, the institution violated financial aid legislation by failing to divide athletically related aid equally across the sports of multisport participants when the financial aid agreements did not specify how such aid should be counted toward institutional limits.

6. [NCAA Division II Manual Bylaw 17.1.6.3.4 (2013-14)]

The institution and NCAA enforcement staff agree that during the 2013-14 academic year, the institution violated NCAA playing and practice season legislation by failing to maintain accurate logs of countable athletically related activities in men's tennis, women's track and field, men's basketball, football and women's volleyball.

7. [NCAA Division II Manual Constitution 2.1.1, 2.8.1 and 6.01.1 (2010-11 through 2013-14)]

The institution and NCAA enforcement staff agree that the scope and nature of the violations set forth in Proposed Finding Nos. 1 through 6 demonstrate that from 2010 through 2014, the institution failed to exercise institutional control and monitoring in the conduct and administration of its athletics programs in that it failed to implement a system of compliance methods to deter and detect NCAA rules violations, to monitor policies and procedures, to support and ensure the effective operation of its compliance methods and to provide accurate NCAA rules education regarding key topics.

IV. REVIEW OF CASE

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 constituted major and secondary violations of NCAA legislation.

Under NCAA Bylaw 19.02.2.2, major violations are those that provide more than a minimal recruiting, competitive or other advantage or include any significant impermissible benefit. In this case, the institution agreed that it permitted major violations to occur in three categories: (1) failure to certify student-athletes' amateurism; (2) failure to ensure three student-athletes met eligibility requirements; and (3) failure to maintain accurate CARA logs. The institution also agreed that it committed a secondary violation when it failed to abide by financial aid legislation for four multisport student-athletes. These violations further support the agreed-upon lack of institutional control violation.

³ Originally, the parties presented agreed-upon Violation No. 5 as a major violation. The committee, however, proposed and the parties accepted reclassifying Violation No. 5 as a secondary violation.

Regarding the agreed-upon amateurism violations, the institution agreed that over four academic years it failed to verify the amateurism status for 106 student-athletes in 10 sports. The institution also provided these student-athletes with travel expenses. This conduct violated NCAA Bylaws 12 and 16.

NCAA Bylaw 12.1.1 requires member institutions to determine the validity of prospective student-athletes' amateur status. NCAA Bylaw 16.8.1.2 permits institutions to provide actual and necessary travel expenses to eligible student-athletes who represent the institution in competition.

The institution acknowledged that it did not fully understand and implement amateurism requirements. The institution operated under three misunderstandings or mistaken beliefs. The institution incorrectly believed that the Eligibility Center exclusively handled initial eligibility determinations. It also believed the Eligibility Center did not have to be consulted for transfer student-athletes. Finally, the institution did not understand that it was required to verify multisport student-athletes' amateurism status in each sport in which they participated. These mistaken beliefs resulted in 106 student-athletes participating in competition and receiving travel expenses when they were ineligible. When the institution failed to properly certify the amateurism of 106 student-athletes, it violated NCAA Bylaw 12.1.1. Further, because the institution provided the ineligible student-athletes with travel expenses, it violated NCAA Bylaw 16.8.1.2. The committee concludes that this is a major violation.

The institution also agreed that it violated NCAA eligibility and benefits legislation when it permitted three student-athletes who did not meet eligibility requirements to compete and receive impermissible expenses. The student-athletes did not meet seasons of participation, progress-toward-degree or transfer restrictions and requirements. This conduct violated NCAA Bylaws 14 and 16.

Generally, NCAA Bylaw 14 outlines academic eligibility requirements. NCAA Bylaw 14.2.2 requires that a student-athlete complete their participation during the first ten semesters of enrollment. NCAA Bylaws 14.4.1 and 14.4.3 require student-athletes to meet progress-toward-degree requirements in order to be eligible for competition and travel expenses. Unless a transfer student-athlete meets certain requirements or an exception, NCAA Bylaw 14.5.1 requires transfer student-athletes to serve a year in academic residency prior to competing or receiving travel expenses. Finally, NCAA Bylaw 16.8.2.1 only permits eligible student-athletes to receive actual and necessary travel expenses.

During the 2010-11 and 2011-12 academic years, the institution permitted three student-athletes to compete and receive travel expenses when they failed to meet eligibility requirements. The institution permitted a student-athlete to engage in a season of participation following his tenth semester. Similarly, it permitted another student-athlete to compete when he failed to meet progress-toward-degree requirements. Finally, a third student-athlete transferred to the institution in summer 2010 and did not satisfy any exceptions for the required year in residency.

Subsequently, the institution permitted him to compete. The institution also provided all three student-athletes with travel expenses.

When the institution permitted a student-athlete to participate during his eleventh semester, it allowed him to engage in a season of participation following his tenth semester. His participation violated NCAA Bylaw 14.2.2. Additionally, when the institution permitted another student-athlete to compete when he failed to meet progress-toward-degree requirements, it violated NCAA Bylaws 14.4.1 and 14.4.3. The institution permitted a transfer student-athlete to compete without serving the required year in residency. Because the institution did not withhold the transfer student-athlete, it violated NCAA Bylaw 14.5.1. Finally, because the institution also provided each of the student-athletes with travel expenses when they were ineligible to receive them, it violated NCAA Bylaw 16.8.2.1. The committee concludes that cumulatively these three instances amount to a major violation.

As it relates to the playing and practice season violation, the institution agreed that during the 2013-14 academic year it did not maintain accurate CARA logs for five sport programs. This conduct violated NCAA Bylaw 17. NCAA Bylaw 17.1.6.3.4 requires institutions to record countable hours for each student-athlete. The institution discovered that it did not maintain accurate CARA logs. In some instances, logs had recordkeeping errors. In others, portions of logs were missing. For one sport, the institution could not locate any logs. When the institution failed to maintain complete and accurate logs in five sport programs, it violated NCAA Bylaw 17.1.6.3.4. The committee concludes the violation is major.

With regard to the agreed-upon financial aid violation, the institution also agreed that it failed to properly administer financial aid for four multisport student-athletes. The institution did not divide their athletically related aid equally across the sports in which they participated when their financial aid agreements did not specify how the aid should be distributed. This conduct violated NCAA Bylaw 15.

NCAA Bylaw 15 addresses financial aid. NCAA Bylaw 15.5.3.1 requires institutions to divide athletically related aid equally among all sports in which a student-athlete participates when their financial aid agreement does not specify how the aid should be counted toward institutional limits.

The institution identified four multisport student-athletes whose athletically related aid should have been divided equally but was not. The institution noted, however, that none of the aid distribution resulted in exceeding grant-in-aid limits. When the institution failed to divide the multisport student-athletes' athletically related aid equally across the sport programs in which they participated, it violated NCAA Bylaw 15.5.3.1. However, because the distribution of aid would have been permissible if the student-athletes' aid agreements identified the unequal distribution, and because it did not result in the institution exceeding aid limits, the committee concludes that the violation is secondary.

Finally, the institution agreed that from the 2010-11 through 2013-14 academic years it failed to exercise institutional control and monitoring in the conduct and administration of its athletics programs. The institution's controls and compliance systems in place permitted the agreed-upon violations to occur. The institution's administration of its athletics programs violated NCAA Constitution 2 and 6.

Generally, NCAA Constitution 2.1.1 and 2.8.1 require that each member institution comply with all rules and regulations of the Association and monitor its programs to ensure compliance. Further, NCAA Constitution 6.01.1 mandates that the institution's administration or faculty, or a combination of the two, exercise control and responsibility over the conduct of the institution's intercollegiate athletics programs.

For four academic years, the institution agreed that it failed to meet NCAA constitutional requirements and expectations. Because of mistaken beliefs, an inadequate compliance system and insufficient checks and balances, the institution permitted the agreed-upon violations to occur and did not have the proper systems in place to detect and prevent continuing violations. The institution did not ensure compliance with all rules and regulations because it permitted amateurism, eligibility, playing and practice season and financial aid violations to occur. As a result, the institution failed to meet the expectations and requirements of NCAA Constitution 2.1.1 and 2.8.1. Similarly, because of inadequate systems and the violations that occurred, the institution failed to exercise the required control over its athletics programs and violated NCAA Bylaw 6.01.1.

This case is an example of a lack of institutional control. The agreed-upon violations stemmed from the institution's lack of understanding and execution of NCAA rules and regulations at the time it transitioned to Division II membership. When the institution became an NCAA member, it had the duty and responsibility to abide by the expectations of NCAA membership. Those expectations include a full understanding and execution of all NCAA rules and regulations, as well as, an adequate athletics compliance system. Although a good-faith mistake, the institution relied on misunderstandings and did not otherwise educate other athletics and institutional staff on NCAA rules. The institution did not meet these expectations, which permitted the violations to occur over a four-year period. The committee reminds institutions, particularly those transitioning to NCAA membership, to use the resources available to ensure that the administration of their athletics and compliance programs meet the expectations of NCAA membership.

V. PENALTIES

For the reasons set forth in Sections III and IV of this decision, the committee concludes that this case involved major and secondary violations of NCAA legislation. In prescribing appropriate 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 concludes that the cooperation exhibited by the institution was consistent with its

obligation under the bylaws. As the institution agreed to the factual findings, violations and the committee's proposed additional penalties, there is no opportunity to appeal.

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

Penalties, Disciplinary Measures and Corrective Actions (NCAA Bylaw 19.5.2)

1. Public reprimand and censure.
2. Three years of probation from March 4, 2016, through March 3, 2019.⁴
3. The institution shall pay a fine of \$5,000 to the Association.⁵
4. Pursuant to NCAA Bylaws 19.5.2-(g) and 32.2.2.4, the institution shall vacate all wins in which ineligible student-athletes competed during the 2010-11 through 2014-15 academic years. If student-athletes competed in any NCAA postseason events during the period of ineligibility, the institution's participation in those events shall also be vacated. The individual records of the student-athletes shall also be vacated. Further, the institution's records in the affected sports, as well as the record of the respective head coaches, will reflect the vacated records and will be recorded in all publications in which records are reported, including, but not limited to, institutional media guides, recruiting material, electronic and digital media plus institutional, conference and NCAA archives. Head coaches with vacated wins on their records may not count the vacated wins to attain specific honors or victory "milestones" such as 100th, 200th or 500th career victories. Any public reference to these vacated contests shall be removed from athletics department stationery, banners displayed in public areas and any other forum in which they may appear.

Finally, to ensure that all institutional and student-athlete vacations, statistics and records are accurately reflected in official NCAA publications and archives, the sports information director (or other designee as assigned by the director of athletics) must contact the NCAA Media Coordination and Statistics office and appropriate conference officials to identify the specific student-athletes and contests impacted by the penalties. In addition, the institution must provide the NCAA Media Coordination and Statistics office a written report, detailing those discussions. This document will be maintained in the permanent files of the NCAA Media

⁴ The institution proposed a two-year probationary period. Institutions may propose probationary periods, but the authority to prescribe NCAA probation rests solely with the committee. Periods of probation always commence with the release of the infractions decision.

⁵ The institution proposed a \$2,500 fine.

- Coordination and Statistics office. This written report must be delivered to the office no later than 45 days following the release of this decision.
5. During the 2015-16 academic year, the institution shall undergo a Blueprint Compliance Review. If a Blueprint review is unavailable, then the institution shall undertake a comprehensive audit of its athletics compliance program. The audit shall be conducted by an outside agency and include, at a minimum, amateurism, eligibility, certification, financial aid administration and compliance education. The institution shall implement and abide by all recommendations made by the reviewer. The institution shall provide a copy of the reviewer's report in its first annual compliance report. (Institution imposed.)
 6. The director of athletics, assistant coordinator for compliance, the faculty athletics representative, a representative from the Registrar's office and a representative from the Financial Aid office shall attend an NCAA Regional Rules Seminar during 2016. The committee further directs that the institution provide in its first annual compliance report a list of the sessions each administrator attended at the seminar.
 7. During this period of probation, the institution shall:
 - a. Continue to develop and implement a comprehensive, campus-wide NCAA rules compliance and education program on NCAA legislation to instruct the coaches, the faculty athletics representative, all athletics department personnel and all institution staff members with responsibility for the certification of student-athletes' eligibility for admission, financial aid, practice or competition;
 - b. Submit a preliminary report to the Office of the Committees on Infractions by May 1, 2016, setting forth a schedule for establishing this compliance and educational program;
 - c. File with the Office of the Committees on Infractions annual compliance reports indicating the progress made with this program on February 1 each year during the period of probation. Particular emphasis shall be placed on rules education relating to amateurism, eligibility, financial aid and playing and practice seasons. The report must also include documentation of the institution's compliance with the penalties adopted and prescribed by the committee;
 - d. Inform all prospective student-athletes that the institution is on probation for three years and explain the violations committed. The information must be provided in writing and for the full term of probation. The information must be provided before a prospective student-athlete signs a National Letter of Intent and no later than when the NCAA Eligibility Center provides a prospective student-athlete with the institution's academic data (see NCAA Bylaw 13.3.1.2); and

- 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 including the types of violations and the affected sport programs and a direct, conspicuous link to the public infractions decision located on the athletic department's main webpage ("landing page"). The information shall also be included in the institution's media guides and in an alumni publication. The statement must: (i) clearly describe the infractions; (ii) include the length of probation 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.
8. At the conclusion of the probationary period, 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.

As required by NCAA legislation for any institution involved in a major infractions case, Central State University 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 4, 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

Douglas D. Blais
John D. Lackey
Bridget Lyons
Julie A. Rochester, chair
Carey Snyder
Jane Teixeira

APPENDIX

**THE INSTITUTION'S CORRECTIVE ACTIONS AS IDENTIFIED IN THE
NOVEMBER 13, 2015, SUMMARY DISPOSITION REPORT.**

1. Beginning in the 2014-15 academic year, Central State has not permitted any student-athlete to practice until amateurism certification is complete. After the completion of amateurism, a student is permitted to being practice if enrolled at the time.
2. In 2014, Central State purchased compliance software to assist compliance monitoring in areas such as CARA hours, participation reporting, financial aid renewal/cancellation/reduction monitoring, student-athlete ticket distribution monitoring, sports teams season declaration and all NCAA forms (Student-Athlete Statement, Buckley Amendment Statement, and Drug Testing Consent). In the fall 2015, the university compliance department also expanded the usage of Compliance Assistance to increase monitoring in the area of recruiting.
3. In the summers of 2014 and 2015, representatives of the university's athletics department and other key institutional stakeholders attended a NCAA Regional Rules seminar. Attendees during the two summers included:
 - Athletics Director
 - Director of Compliance
 - Assistant Coordinator/Compliance & Student-Athlete Support Services
 - A representative of the University's Registrar's Office
 - A representative of the University's Financial Aid Office
 - Faculty Athletic Representative
 - Director of Facilities and Recreation
 - Head Men's Basketball Coach and two assistant coaches
 - Head Women's Basketball Coach and one assistant coach
 - Head Football Coach and three assistant coaches
 - Head Track & Field/Cross Country Coach and one assistant coach
 - Head Volleyball Coach
4. In 2015, Central State budgeted and staffed an assistant coordinator/compliance and student-athlete support Services position to assist the new director of compliance.
5. In 2015, when the director of compliance left the university for a position in a Division 1 institution's compliance department, the university budgeted and staffed his replacement as associate athletics director and hired the current associate athletics director in this position.

[Language relating to the associate athletics director's background has been omitted. It pertained to extensive administrative and compliance experience.]⁶

6. In 2014, during and prior to this investigation the university received an external audit of the NCAA compliance policies and procedures from the G-MAC conference. The university has updated and implemented the compliance policy and procedures as a result of the vulnerabilities found through the compliance review.

⁶ The committee omitted the detailed background of the new associate athletics director because the committee does not identify individuals in its infractions decisions.