



ALABAMA STATE UNIVERSITY
PUBLIC INFRACTIONS DECISION
OCTOBER 21, 2016

I. INTRODUCTION

The NCAA Division I Committee on Infractions is an independent administrative body of the NCAA comprised of individuals from the NCAA Division I membership and the public. The committee is charged with deciding infractions cases involving member institutions and their staffs.¹ This case involved a failure to monitor student-athlete bookstore purchases by Alabama State University.² It also involved the institution's softball program exceeding time limits for countable athletically related activities (CARA). A panel of the committee considered this case through the cooperative summary disposition process in which all parties agreed to the primary facts and violations, as fully set forth in the summary disposition report (SDR). The panel adopted the institution's self-imposed penalties and proposed additional penalties to the institution and the former head softball coach. Both parties agreed to the proposed penalties; therefore, there is no opportunity to appeal.

The parties agreed that, during the 2011-12 academic year, the institution failed to monitor bookstore purchases by student-athletes and provide adequate education for bookstore staff. As a result, 170 student-athletes received extra benefits when the campus bookstore allowed them to use book scholarships to purchase supplies or non-required course-related materials.

Additionally, the parties agreed that during the 2013-14 academic year, the softball program engaged in CARA in excess of the time limits imposed by NCAA legislation. The former head softball coach failed to prevent the overages. As a result, the former head softball coach failed to promote an atmosphere for compliance in the softball program.

The panel accepts the parties' factual agreements and that violations occurred in this case. After considering the aggravating and mitigating factors, the panel classifies this case as Level II-Standard for the institution and the former head softball coach. The violations occurred predominantly following October 30, 2012; therefore, the panel prescribes penalties pursuant to NCAA Bylaw 19.9. The panel adopts and prescribes the following core penalties under Figure 19-1: a two-year probationary period, CARA reductions, a financial penalty and one-year show-cause order for the conduct of the former head softball coach.

¹ Infractions cases are decided by hearing panels comprised of NCAA Division I Committee on Infractions members. Decisions issued by hearing panels are made on behalf of the Committee on Infractions.

² A member of the Southwestern Athletic Conference, the institution's total enrollment is approximately 5,000. The institution sponsors eight men's sports and nine women's sports. This is the institution's fifth infractions case. Previously, the institution had major infractions cases in 2008 (football), 1995 (three sports), 1987 (football) and 1985 (football).

II. CASE HISTORY

On March 8, 2012, a suspended baseball student-athlete sent a letter to institutional administrators referencing potential NCAA rules violations in the baseball program. One allegation was that student-athletes used scholarship money to purchase items not required for their courses at the campus bookstore. An outside law firm hired by the institution investigated the allegations, as well as allegations of potential rules violations in the softball program. On April 17, 2015, the enforcement staff issued a verbal notice of inquiry to the institution. On May 23, 2016, the enforcement staff, institution and the head softball coach submitted a summary disposition report (SDR) to the Office of the Committee on Infractions. A panel of the Division I committee reviewed the report on June 24, 2016.

On June 28, 2016, the panel requested further information from the parties pursuant to NCAA Bylaw 19.6.4.2. The parties responded on July 5, 2016. In an August 1, 2016, letter to the parties, the panel asked the parties to explore whether they could agree on proposed violations and violation levels. The parties came to an agreement and submitted a revised SDR on August 10, 2016. The panel accepted the revised SDR. On September 6, 2016, the panel proposed a show-cause penalty for the conduct of the former head softball coach. On September 9, 2016, the former head softball coach informed the panel that she accepted the proposed penalty. On September 15, 2016, the panel proposed further penalties to the institution. On September 21, 2016, the institution informed the panel that it accepted the proposed penalties.

III. PARTIES' AGREEMENTS

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

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

1. EXCEEDING CARA TIME LIMITS. [NCAA Division I Manual Bylaws 14.12.1.1, 17.1.6.1 and 17.1.6.3.4 (2013-14)]

The NCAA enforcement staff, the institution and the former head softball coach (former head coach) agree that during the 2013-14 academic year, the former head coach failed to prevent the softball student-athletes from participating in countable athletically related activities (CARA) that exceeded the time limits of NCAA legislation on multiple occasions. Additionally, the softball program failed to record accurately the student-athletes' countable hours. Further, the former head coach failed to apply penalties prescribed by the NCAA Division I Committee on Academic Performance, which limited CARA. Specifically:

- a. Between September 22, 2013, and March 1, 2014, the former head coach failed to prevent the softball student-athletes from participating in CARA that exceeded the daily and weekly practice hour limitations on multiple occasions.
 - (1) On five occasions between September 22 and October 31, 2013, student-athletes participated in, at a minimum, four hours and 15 minutes to four hours and 30 minutes of CARA per day, which exceeded the maximum of four hours per day. Further, on three occasions between September 22 and October 19, 2013, student-athletes participated in, at a minimum, 17 to 19 hours and 30 minutes per week of CARA, which exceeded the limit of 16 hours prescribed by the Committee on Academic Performance.
 - (2) On six occasions between January 12 and February 2, 2014, student-athletes participated in, at a minimum, four hours and 15 minutes to four hours and 30 minutes of CARA per day, which exceeded the maximum of four hours per day. Further, on four occasions between January 12 and March 1, 2014, student-athletes participated in, at a minimum, 16 hours and 15 minutes to 17 hours and 30 minutes of CARA per week, which exceeded the limit of 16 hours prescribed by the Committee on Academic Performance.
 - (3) During the week of September 29, 2013, student-athletes were not provided two days off from CARA as required by the Committee on Academic Performance.
- b. During the 2013-14 academic year, the softball coaches failed to include and record required pre-practice warm-up activities and post-practice team meetings within the hour limits for CARA.

2. HEAD COACH RESPONSIBILITY. [NCAA Division I Manual Bylaws 11.1.2.1 (2013-14)]

The NCAA enforcement staff, the institution and former head coach agree that during the 2013-14 academic year, the former head coach was presumed responsible for the violations outlined in Violation No. 1 and did not rebut that presumption. Specifically, the former head coach failed to demonstrate that she promoted an atmosphere for compliance within the softball program because she was personally involved in violations by: (1) failing to prevent student-athletes from participating in CARA that exceeded the daily and weekly practice hour limitations on multiple occasions; and (2) failing to provide at least two days off during the week of September 29 through October 5, 2013, as required by the Committee on Academic Performance.

3. FAILURE TO MONITOR. [NCAA Division I Manual Constitution 2.8.1 (2011-12)]

The NCAA enforcement staff and institution agree that during the 2011-12 academic year, the institution failed to adequately monitor student-athletes' bookstore purchases. Specifically, the institution did not fully implement a previously established compliance system when it failed to continue its in-store monitoring of student-athletes' bookstore purchases in 2011-12 and

failed to provide adequate NCAA rules education to institutional staff members and bookstore personnel. As a result, the bookstore provided impermissible extra benefits to 170 student-athletes.

4. IMPERMISSIBLE BENEFITS. [NCAA Division I Manual Bylaws 15.01.2, 15.2.3, 16.3.1.1.1-(c) and 16.11.2.1 (2011-12)] (Level III)

The NCAA enforcement staff and the institution agree that during the 2011-12 academic year, 170 student-athletes received extra benefits when the bookstore staff permitted the student-athletes to use their book scholarships to purchase items that were not required course-related books or supplies. The items included academic supplies to assist the student-athletes in their academic coursework, and could have been provided by the institution through the NCAA Opportunity Fund. Most of the student-athlete received benefits valued at \$100 or less. The total amount of the extra benefits received by the student-athletes was approximately \$5,565.

B. PARTIES' AGREED-UPON AGGRAVATING AND MITIGATING FACTORS

Pursuant to NCAA Bylaw 19.6.2-(g), the parties agreed to certain aggravating and mitigating factors. The panel determines that the following aggravating and mitigating factors apply to the parties:

1. Agreed-upon aggravating and mitigating factors. [NCAA Bylaws 19.9.3 and 19.9.4].

a. Aggravating factors.

(1) Institution.

(a) A history of Level I, Level II or major violations by the institution and involved individual. [NCAA Bylaw 19.9.3-(b)]

(2) Former head softball coach.

None.

b. Mitigating factors.

(1) Institution.

(a) Prompt acknowledgement of the violation, acceptance of responsibility and imposition of meaningful corrective measures and/or penalties. [NCAA Bylaw 19.9.4-(b)]

(2) Former head coach

- (a) Prompt acknowledgement of the violation and acceptance of responsibility.
[NCAA Bylaw 19.9.4-(b)]

IV. REVIEW OF CASE

The submitted SDR fully detailed the parties' positions in the infractions case and included the agreed-upon primary facts, violations, violation levels and aggravating and mitigating factors. After reviewing the parties' principal factual agreements and the respective explanations surrounding those agreements, the panel accepts the parties' SDR and concludes that the facts constitute Level II and Level III violations of NCAA legislation. Specifically, the institution agreed that it failed to adequately monitor the student-athletes' bookstore purchases or provide adequate rules education to the bookstore staff. The failure to monitor resulted in a series of Level III violations when student-athletes used their book scholarships to purchase non-required course materials or supplies. Further, the former head coach agreed that CARA overages occurred in the softball program and that she was responsible for the Level II violations.

During the 2011-12 academic year, the institution failed to adequately monitor the textbook purchasing process or educate bookstore personnel. The institution's failure resulted in student-athletes receiving impermissible benefits. NCAA Constitution 2.8.1 requires all member institutions to monitor their athletics program so as to ensure full compliance with the rules and regulations of the Association.

Starting in 2009, the institution had in place a system for monitoring bookstore purchases by student-athletes. The policy required student-athletes to complete a book voucher listing their courses and the required textbooks for each. After the student-athletes gathered their books and checked out, on-site members of the academic support services and compliance staffs reviewed the vouchers to ensure that the student-athletes were only getting required books and supplies. In March 2011, the institution's director of athletics told the director of the academic support services staff that the academic support unit would have sole oversight of bookstore purchases. However, by the fall, the director of academic services felt that his unit was too busy with other issues and that the office of compliance was better suited to monitor the bookstore. He therefore instructed his staff to not monitor the bookstore purchases. The academic support services staff member who had been involved in the monitoring shifted her duties to bookstore staff members, who were not educated regarding NCAA financial aid rules. As a result, neither the academic support services staff nor the compliance office monitored the purchases. Even though the bookstore staff then had sole oversight of bookstore transactions, the institution did not provide bookstore staff with financial aid education.

The bookstore staff was unaware that student-athletes were only allowed to receive required course-related books and materials. As a result, the staff allowed the student-athletes to spend an

additional \$30 on materials or supplies.³ In part because the academic support services staff and compliance office no longer monitored the bookstore, and in part because the institution did not educate the bookstore staff regarding financial aid rules, a series of Level III violations occurred when the bookstore allowed 170 student-athletes to receive materials and supplies beyond those required for their courses.⁴ The violations were Level III because the value of the items received by most of the student-athletes was nominal, the items were for academic purposes and the institution could have provided them through other means. The institution violated NCAA Constitution 2.8.1 when it gave full responsibility for the textbook purchasing process to the bookstore staff, failed to educate the bookstore staff and removed athletics oversight from the book purchasing process. The panel concludes that the Failure to Monitor is a Level II violation. Failure to Monitor is presumed to be Level II, although these violations can be Level I if they are substantial or egregious. In this case, they were not.

Regarding the violations in the softball program, the team participated in CARA that exceeded legislated time limits on a number of occasions during the 2013-14 academic year. The former head coach failed to prevent the violations from occurring. As leader of the softball program, the former head coach was responsible for the violations. The CARA overages violated NCAA Bylaws 14 and 17. The former head coach violated NCAA Bylaw 11.

NCAA Bylaw 14.12.1.1 requires member institutions to apply applicable penalties when notified of those penalties by the NCAA Committee on Academic Performance (CAP). NCAA Bylaw 17.1.6.1 sets forth both the daily and weekly CARA time limits in which coaches can require student-athletes to participate. Softball student-athletes, similar to student-athletes involved in other sports, are limited to a maximum of four hours per day and 20 hours per week. NCAA Bylaw 17.1.6.3.4 requires institutions to record CARA activities for each student-athlete on a daily basis. Finally, NCAA Bylaw 11.1.2.1 provides that head coaches are responsible for setting an atmosphere for rules compliance within their programs.

At times during the 2013-14 academic year, the softball student-athletes participated in CARA from 15 to 30 minutes beyond four hours per day and from 16.5 to 19.5 hours per week.⁵ The former head coach preached to her student-athletes that "early is on time, on time is late" in regard to being at practice. As a result, the student-athletes decided on their own that they would arrive at the practice site 15 minutes before the start of practice to run and stretch so as to be prepared to begin their actual practice activities when the former head coach arrived. The former head coach did not direct them to arrive 15 minutes early, although she did not prevent them from doing so.

³ Students awarded certain types of scholarships at the institution were able to receive the additional \$30 in supplies and materials. Bookstore personnel were unaware that those students did not include students receiving athletically related financial aid. The students on scholarship did not actually "spend" any money; they were extended credits on their accounts.

⁴ The bookstore personnel allowed some student-athletes to purchase more than \$30 of materials/supplies.

⁵ At the time, the softball program was limited to 16 total hours of CARA per week, with a mandatory two days off per week, due to penalties prescribed by CAP.

Also, at times during the year the former head coach held approximately 15-minute post-practice meetings with the team.

In September and October 2013, and January and February 2014, the student-athletes engaged in the pre-practice activities and/or post-practice meetings on 11 different days. These activities resulted in them participating in CARA anywhere from four hours and 15 minutes to four and 30 minutes on those occasions. The length of the activities also resulted in the student-athletes participating in from 17 to 19.5 weekly CARA hours on three occasions during the fall 2013 months and from 16.25 to 17.5 weekly hours from January 12 to March 1, 2014. The softball coaching staff did not record either the pre-practice activities or post-practice meetings on the team CARA logs. Finally, the CAP penalties also required the softball program to take two days off from CARA each week of the academic year. During the week of September 29, 2013, the coaches only provided the softball student-athletes with one day without CARA.

When the softball student-athletes engaged in more than 16 hours of CARA per week and had less than two days off per week, the institution violated NCAA Bylaw 14.12.1.1. When the softball student-athletes engaged in the pre- and post-practice activities and the coaches did not record the activities on the CARA logs, the institution violated NCAA Bylaws 17.1.6.1 and 17.1.6.3.4. The former head coach did not prevent the violations from occurring. Pursuant to NCAA Bylaw 11.1.2.1, she was responsible for the violations in her program.⁶ The panel concludes that the violations are Level II, because they allowed the student-athletes to participate in CARA longer than they should have.

V. PENALTIES

For the reasons set forth in Sections III and IV of this decision, the panel accepts the parties' agreed-upon factual basis and violations and concludes that this case involved Level II and Level III violations of NCAA legislation. The panel then determined the applicable penalty classification. Level II violations are significant breaches of conduct that provide or are intended to provide more than a minimal but less than a substantial or extensive recruiting, competitive or other advantage.

The panel then determined that one aggravating factor and one mitigating factor were present for the institution and that no aggravating factors and one mitigating factor were present for the former head softball coach. After weighing the aggravating and mitigating factors, the panel classifies this case as Level II-Standard for the institution and the former head softball coach. The Level II violations in this case occurred predominantly subsequent to October 30, 2012, the date of the adoption of current NCAA Bylaw 19.9.1. Therefore, the current penalty structure applies.

The parties agreed to the facts and violations. The panel adopted the institution's proposed penalties, while the former head softball coach agreed to the panel's proposed penalty for her

⁶ The former head coach did not dispute the violations. Therefore, the rebuttable presumption of head coach responsibility was not at issue.

conduct. The institution also accepted the panel's proposed additional penalties. Therefore, there is no opportunity for appeal. All penalties prescribed in this case are independent of and supplemental to any action that has been or may be taken by the Committee on Academics through its assessment of postseason ineligibility, historical penalties or other penalties.

The institution's corrective actions are contained in the Appendix. After considering all information relevant to the case, the panel prescribes the following penalties. Those penalties self-imposed by the institution are so noted:

Core Penalties for Level II-Standard Violations by the Institution (NCAA Bylaw 19.9.5)

1. Probation: Two years of probation from October 21, 2016, through October 20, 2018.⁷
2. Financial penalty: The institution shall pay a \$5,000 fine. (Institution imposed).⁸

Additional Penalties for Level II-Standard Violations by the Institution (NCAA Bylaw 19.9.7)

3. Public reprimand and censure.
4. The softball team will be required to reduce the number of permitted countable athletically related activity hours from 20 to 16 and provide softball student-athletes with two days off during the spring 2015 championship segment and the 2015-16 academic year. (Institution imposed).
5. 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 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 December 15, 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 by August 31 of each year. Particular emphasis should

⁷ The institution proposed a two-year term of probation. Institutions may propose probationary periods, but the authority to prescribe NCAA probation rests solely with the panel. Periods of probation commence with the release of the infractions decision.

⁸ The fine must be calculated and submitted in accordance with Division I Committee on Infractions Internal Operating Procedures 4-16-2 and 4-16-2-1.

be placed on education regarding financial aid and adhering to countable hour legislation. The reports must also include documentation of the institution's compliance with the penalties adopted and prescribed by the panel;

- d. Inform prospective student-athletes in the softball program that the institution is on probation for two-years and detail the violations committed. If a prospective student-athlete takes an official paid visit, the information regarding violations, penalties and terms of probation must be provided in advance of the visit. Otherwise, the information must be provided before a prospective student-athlete signs a National Letter of Intent; and
 - e. 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 programs and a direct, conspicuous link to the public infractions decision located on the athletic department's main webpage, the "landing page." The information shall also be included in institutional media guides and in an alumni publication. The institution's statement must: (1) clearly describe the infractions; (2) include the length of the probationary period associated with the major infractions case; and (3) 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.
6. 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.

Core Penalties for Level II-Standard Violations by the former head softball coach (NCAA Bylaw 19.9.5)

7. Show-cause order: During the 2013-14 academic year, the former head softball coach failed to prevent the softball student-athletes from participating in countable athletically related activity (CARA) that exceeded daily and weekly practice hour limitations. Therefore, the panel prescribes a show-cause order pursuant to NCAA Bylaw 19.9.5.4.

The NCAA will inform the former head softball coach in writing that, due to the violations, she will be under a one-year show-cause order from October 20, 2016, through October 19, 2017. If she secures a position with a member institution and has responsibilities in the institution's athletics department during the period of the show-cause order, she must inform that institution's athletics department that she is under a show-cause order. The conditions of the show-cause order are as follows:

- a. The former head softball coach shall attend an NCAA Regional Rules Seminar during the term of the show-cause; and

- b. If employed as a head coach, the former head coach shall meet weekly with the director of athletics compliance to submit her CARA logs and discuss the type and duration of countable activities that her team engaged in during the week.
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The committee advises the institution that it should take every precaution to ensure that the terms of the penalties are observed. 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 shall be considered grounds for extending the institution's probationary period, prescribing more severe penalties or may result in additional allegations and violations.

NCAA COMMITTEE ON INFRACTIONS PANEL

John Black

Melissa Conboy

Tom Hill

Joel Maturi

Joe Novak

Larry Parkinson, Chief Hearing Officer

APPENDIX

CORRECTIVE ACTIONS AS IDENTIFIED BY THE INSTITUTION IN THE MAY 23, 2016, SUMMARY DISPOSITION REPORT

1. The institution has revamped its athletics compliance operations, which began in the spring 2013 semester, with the hiring of an associate director of athletics for compliance, a director of compliance and a compliance coordinator.
2. During the fall 2013 semester, the institution implemented an improved textbook distribution and return process, and created enhanced policies and procedures for training, controls and oversight that eliminated the potential recurrence of book scholarship violations. Further, during the fall 2013 semester, the institution's athletics compliance office began monitoring student-athlete bookstore receipts after the conclusion of the textbook distribution process. Finally, during this period, the institution required student-athletes to review and sign a statement acknowledging their understanding of NCAA legislation pertaining to permissible textbook purchases using athletically-related student aid.
3. During the fall 2013 semester, the institution included a review of personnel, academic misconduct, bookstore distribution and extra benefits legislation in a compliance newsletter or other publication.
4. The institution will engage an outside agency to provide rules-education workshops to head coaches, bookstore managers and representatives of campus units with athletically related duties and responsibilities to: ensure compliance with NCAA legislation; confirm the textbook distribution process is operating within NCAA rules and regulations; ensure all penalties are being adopted and followed by the institution; and continue to make any necessary improvements to the textbook distribution process to ensure maximum efficiency.
5. The institution will continue to develop and implement a comprehensive rules education program on NCAA legislation, including seminars and testing, for coaches, the faculty athletics representative, all athletics department personnel and all institutional staff members with responsibility for the financial aid and textbook distribution processes. Further, the institution will increase education and training relating to amateurism, recruiting, eligibility, financial aid and awards and benefits legislation for student-athletes, coaches, the faculty athletics representative, all athletics department personnel, all institutional staff members with athletically related responsibility and all athletics booster organizations.
6. The institution developed an undergraduate student-athlete survey and interview process that will serve a similar purpose to the student-athlete exit-interview process, but will allow the institution to review student-athletes' current satisfaction with his or her student-athlete experience and to identify any potential rules compliance issues. The institution will ensure

the exit interview and undergraduate student-athlete survey and interview processes address textbook distribution and return policy effectiveness and compliance with NCAA legislation.

7. The institution shall implement enhanced procedures for reporting and investigating alleged NCAA rules violations, which will be added to the institution's athletics compliance manual.
8. The institution will:
 - a. Add a part-time student intern or graduate assistant position in the athletics compliance office to assist with the monitoring of the institution's compliance with NCAA legislation, including, but not limited to: conduct on-the-field monitoring of practices and competitions; and review compliance-related reports, logs and electronic submissions.
 - b. Purchase and implement compliance software from ACS Athletics to enhance the institution's compliance functions. [Note 1: The ACS Athletics product will replace the athletics compliance office's Front Rush compliance software.] [Note 2: The institution implemented this measure during the fall 2014 semester.]
 - c. Require that all team practice and competition schedules be submitted for publication on the athletics department calendar, and late changes (within 48 hours of practice time) must be approved via form by the sport administrator.
9. The institution will enhance the exit-interview process through:
 - a. Including student-athletes with remaining eligibility in the exit-interview survey process;
 - b. Incorporating questions in the process to detect compliance-related questions and concerns;
 - c. Conducting "focus groups" of selected student-athletes; and
 - d. Reporting the analysis of the exit-interview surveys and focus group discussions to the president, faculty athletics representative, director of athletics and senior compliance administrator.
10. Conduct a rules education workshop for all coaches, athletics trainers, strength and conditioning staff, team managers and administrators with sport oversight concerning NCAA Bylaw 17.
11. The athletics compliance office will conduct mandatory educational sessions for the softball coaching staff wherein the director of athletics and the senior compliance administrator will reinforce the seriousness of the requirement to meet all NCAA legislation concerning countable athletically-related activities.
12. The employment terms of the head softball coach and assistant softball coach were not renewed for the 2014-15 academic year.
13. The softball coaching staff will be required to submit detailed practice schedules to the athletics compliance office each week. Further, the athletics compliance office will conduct, and document, on-the-field spot-checks of practices for all sports teams.

14. The softball team will be required to submit countable athletically-related activities logs on a weekly basis; the logs must be signed off by three or more softball student-athletes and a member of the athletics training staff to verify the accuracy of the documents.
15. The institution has required all involved student-athletes with eligibility remaining to make full restitution for the improperly obtained materials or supplies. Moreover, student-athletes with violations involving an amount greater than \$100 were required to serve the appropriate suspension and to seek reinstatement from the NCAA.
16. The institution required the director of athletics; athletics compliance staff; all individuals within the institution with responsibility for the distribution of textbooks and athletics aid; and the designated athletics liaisons from the office of financial aid to attend at least one NCAA Regional Rules Seminar during the 2012-14 period.
17. The institution will retain an outside agency to conduct an external review of its athletics compliance program by the date of the first annual compliance report to the Office of the Committees on Infractions. The institution will comply with all the recommendations made by the outside agency in a timely fashion. The purpose of the compliance audit will be to: ensure compliance with NCAA legislation; confirm the textbook distribution process is operating within NCAA rules and regulations; ensure all penalties are being adopted and followed by the institution; and continue to make any necessary improvements to the textbook distribution process to ensure maximum efficiency.