



SEATTLE PACIFIC UNIVERSITY
PUBLIC INFRACTIONS DECISION

March 10, 2017

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 the women's soccer program at Seattle Pacific University and centered on the former head women's soccer coach's financial mismanagement of institutional soccer camps.¹ The parties agreed that this case involved violations of NCAA financial control, recruiting and personnel legislation, all of which demonstrated the former head coach's failure to promote an atmosphere for compliance and the institution's failure to monitor the women's soccer program. 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 committee proposed additional penalties to the institution and the former head coach. The institution agreed to the additional penalties proposed by the committee and therefore has no opportunity to appeal. The former head coach contested his additional penalty at an expedited hearing. The committee retained the contested penalty, which the former head coach has the opportunity to appeal.

As detailed in the SDR, the former head coach made three unilateral financial decisions with respect to the institution's women's soccer camps, all of which violated NCAA legislation that safeguards against the mismanagement of institutional funds. First, when the former head coach processed over \$20,000 in camp registration fees through two personal bank accounts, he violated the foundational NCAA financial control principle that institutional funds must be controlled by the institution. This was a major violation. In addition, the former head coach committed secondary violations of NCAA recruiting and personnel legislation when he selectively discounted camp fees for certain high school teams and provided additional compensation to his assistant coach via cash payments made outside the institution's payroll system. Taken together, these three violations demonstrated the former head coach's lax attitude toward compliance and constituted a violation of NCAA head coach responsibility legislation. Furthermore, the institution agreed that its failure to monitor the former head coach and his operation of the camps contributed to the violations in this case. The committee concludes that the head coach responsibility and failure to monitor violations are major.

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

¹ A member of the Great Northwest Athletic Conference, the institution has an enrollment of approximately 4,000 students. It sponsors seven women's and five men's sports. This is the institution's first major infractions case.

violations occurred. The committee adopts and prescribes the following penalties: a two-year probationary period, a financial penalty, vacation of records, an audit, NCAA Regional Rules Seminar attendance, administrative reporting requirements and a two-year show-cause order for the former head coach.

II. CASE HISTORY

In December 2014, the institution undertook a triennial financial audit as required by NCAA Constitution 6.2.3.1. During the course of that audit, the institution discovered financial irregularities in the women's soccer program. The institution conducted an internal investigation throughout the month of December and, on January 15, 2015, informally notified the NCAA enforcement staff of potential violations of NCAA legislation. On February 25, 2015, the institution submitted a self-report of its investigation to the enforcement staff.

On June 1, 2015, the enforcement staff issued a written notice of inquiry to the institution and, over the next 11 months, conducted interviews and requested documents from the institution. The enforcement staff provided the institution and former head coach access to a draft notice of allegations on May 5, 2016. One week later, on May 12, 2016, the institution and former head coach notified the enforcement staff of their decision to process the case via summary disposition. On October 24, 2016, the parties jointly submitted the SDR to the Division II Committee on Infractions.

The committee reviewed the SDR on November 16, 2016. On November 30, 2016, the committee proposed additional penalties to the institution and former head coach. On December 19, 2016, the institution accepted the proposed penalties. The former head coach notified the committee on December 13, 2016, that he would not accept the penalty proposed for him and requested an expedited hearing on the issue. The committee conducted an expedited penalty hearing via videoconference on February 8, 2017.

III. PARTIES' AGREEMENTS

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

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

1. [NCAA Division II Manual Constitution 6.2.1 (2010-11 through 2014-15)]

The institution, the former head women's soccer coach (former head coach) and the enforcement staff agreed that from June 2011 until December 2014, the former head coach maintained two personal bank accounts, which he funded with proceeds from the institution's women's soccer

camps and a donation to the institution's women's soccer program. Specifically, the former head coach processed approximately \$20,125 in women's soccer camp and tournament fees and a \$500 donation to the women's soccer program through two bank accounts, which were controlled by the former head coach rather than the institution and not subject to the institution's established financial control procedures.

2. [NCAA Division II Manual Bylaws 13.2.1, 13.12.1.5.1 and 13.15.1 (2010-11 through 2013-14)]

The institution, former head coach and the enforcement staff agreed that in July 2012 and July 2014, the former head coach permitted certain girls' high school soccer teams, comprised of ninth through twelfth grade prospects, to pay lower rates than other teams to participate in the institution's women's team soccer camps. During these two years, the institution did not maintain and publish a documented standard for permitting the lower fees. Specifically, in 2012 and 2014, the former head coach permitted four high school teams to pay \$150 to \$500 less than other teams participating in the same camps and totaled approximately \$1,650 in lower fees.

3. [NCAA Division II Manual Bylaw 11.3.1 (2012-13 through 2013-14)]

The institution, former head coach and the enforcement staff agreed that during the summers of 2013 and 2014, the former head coach provided a then assistant women's soccer coach cash payments for working at two institutional girls' high school soccer camps. Specifically, the former head coach provided the assistant coach a total of \$2,200 in cash payments outside of the institution's established payroll procedures for working at the institution's 2013 and 2014 summer women's soccer camps.

4. [NCAA Division II Manual Bylaw 11.1.2.1 (2010-11 through 2014-15)]

The institution, former head coach and the enforcement staff agreed that the scope and nature of the violations in Violation Nos. 1 through 3 indicate that from at least June 2011 until December 2014, the former head coach failed to promote an atmosphere of compliance within the women's soccer program. Specifically:

- a. From June 2011 until December 2014, the former head coach processed approximately \$20,000 in women's soccer camp fees and a donation to the institution's women's soccer program through two personal bank accounts, which were controlled by the former head coach rather than the institution and not subject to the institution's financial control procedures as detailed in Violation No. 1.
- b. In July 2012 and July 2014, the former head coach permitted four high school girls' soccer teams to pay between \$150 and \$500 less than other high school teams to participate in the institution's women's team soccer camps as detailed in Violation No. 2.

- c. During the summers of 2013 and 2014, the former head coach provided an assistant women's soccer coach a total of \$2,200 in cash payments outside of the institution's established payroll procedures for working at the institution's 2013 and 2014 summer women's soccer camps as detailed in Violation No. 3.

5. [NCAA Division II Manual Constitution 2.8.1 (2010-11 through 2014-15)]

The institution and the enforcement staff agreed that from June 2011 until December 2014, the institution failed to monitor its then head women's soccer coach and his operation of the institution's women's soccer camps as required by Constitution 2.8.1, which contributed to making it possible for the former head coach to commit the violations detailed in Violation Nos. 1 through 3. Specifically, the institution did not regularly review whether its head women's soccer coach was submitting the appropriate amount of fees compared to the number of camp participants or charging similar rates for all girls' high school teams partaking in the institution's women's team soccer camps.

IV. REVIEW OF CASE

A. Agreed-upon violations

The submitted SDR fully detailed the parties' positions in the infractions case and included 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 major and secondary violations of NCAA legislation. Specifically, the parties agreed that the former head coach's conduct constituted a major violation of NCAA financial control legislation and secondary violations of recruiting and personnel legislation. Taken together, these violations support the agreed-upon head coach responsibility and institutional failure to monitor violations, both of which are major.

First, the parties agreed that the former head coach's conduct violated NCAA financial control legislation. Constitution 6.2.1 requires an institution's annual athletics budget to be controlled by the institution and subject to its normal budgeting procedures. This provision safeguards against mismanagement of institutional funds and is a foundational principle of the Collegiate Model. From June 2011 until December 2014, the former head coach processed over \$20,000 in institutional funds through two personal bank accounts that were not subject to the institution's established financial control procedures. This conduct violated Constitution 6.2.1. The parties agreed, and the committee concludes, that this violation is major pursuant to Bylaw 19.02.2.2 because it was not isolated or inadvertent.²

² During his expedited penalty hearing, the former head coach stated that although his actions in opening the bank accounts were intentional, the violation of NCAA legislation was inadvertent. This argument has no bearing, however, where the former head coach agreed to the terms of the SDR, which stated that the violation was *not* inadvertent. Moreover, the former head coach was a long-time NCAA coach and it is a fundamental and well-known rule that institutional funds must be controlled by the institution. See *Chadron State College* (2013) (finding intentional violations of NCAA impermissible benefits legislation where

Second, the parties agreed that the former head coach's conduct also violated NCAA recruiting legislation. Various provisions of Bylaw 13 prohibit institutions and their staff members from providing recruiting inducements to prospective student-athletes, including financial aid or other benefits (Bylaw 13.2.1), free or reduced admission privileges to sports camps or clinics (Bylaw 13.12.1.5.1) and financial assistance to pay the costs of a prospective student-athlete's expenses for any period before his or her enrollment (Bylaw 13.15.1). When the former head coach provided selective discounts to certain high school girls' soccer teams attending the institution's soccer camps, his conduct violated Bylaws 13.2.1, 13.12.1.5.1 and 13.15.1. Moreover, the former head coach's conduct led to ineligible competition by one current women's soccer student-athlete (the student-athlete), who attended the institution's 2012 camp as a member of a high school team that received a \$500 camp discount.³ The student-athlete later enrolled at the institution and, during the 2015-16 academic year, impermissibly competed in 16 contests before other institutional staff members learned of her involvement in the recruiting violation. The parties agreed, and the committee concludes, that the recruiting violation is secondary pursuant to Bylaw 19.02.2.2.

Third, the parties agreed that the former head coach's conduct violated NCAA personnel legislation. Bylaw 11.3.1 requires the institution, as opposed to any outside source, to control the salaries of its employees.⁴ When the former head coach made cash payments to the former assistant coach outside of the institution's established payroll procedures, his conduct violated Bylaw 11.3.1. The parties agreed, and the committee concludes, that this violation is secondary.

Taken together, these three violations demonstrate that the former head coach failed to promote an atmosphere for compliance as required by Bylaw 11. Under Bylaw 11.1.2.1, it is the responsibility of a head coach to promote an atmosphere for compliance within the program he or she supervises. The former head coach failed to meet this responsibility when he processed institutional funds through personal bank accounts and provided impermissible camp discounts and assistant coach compensation. Moreover, he unilaterally engaged in this conduct without first reviewing applicable NCAA legislation or seeking input from the institution's compliance staff or director of athletics. This conduct demonstrates a lax attitude toward compliance that does not meet the membership's high standards for head coaches. Accordingly, the former head coach's conduct violated Bylaw 11.1.2.1. The parties agreed that this violation is major because the underlying conduct, which spanned a four-year period and involved over \$20,000 in institutional funds, was not isolated or inadvertent. The committee concurs. *See East Central University (2015)* (concluding that a head coach committed a major violation of Bylaw 11.1.2.1 when he engaged in multiple recruiting violations and did not consult with the compliance office regarding the permissibility of his conduct).

"[t]he head coach was a long-time NCAA coach" and "[t]he prohibition against providing money to student-athletes is a basic tenet of amateurism and a well-known rule.").

³ The student-athlete was unaware of the discount because her team's camp fees were paid by a high school booster club.

⁴ Bylaw 11.3.1 in the 2012-13 through 2013-14 NCAA Division II Manuals was renumbered to Bylaw 11.4.1 beginning with the 2015-16 NCAA Division II Manual.

Finally, the institution agreed that its failure to monitor the former head coach and his operation of institutional soccer camps contributed to the violations in this case. The institution's conduct violated Constitution 2.8.1, which requires institutions to monitor their programs to ensure compliance. Here, the institution acknowledged that it did not regularly review the former head coach's operation of institutional soccer camps, including his processing of camp fees and the rates he charged camp participants. The institution's compliance system did not provide adequate checks and balances to detect and prevent violations of NCAA legislation. Accordingly, the institution's failure to monitor violated Constitution 2.8.1. The committee concludes that this is a major violation because the underlying conduct was neither isolated nor inadvertent and included at least one other major violation. *See Chadron State College (2013)* (concluding that the institution failed to monitor a head coach who held athletics funds in outside bank accounts and this failure constituted a major violation of Constitution 2.8.1).

B. Contested penalties

After accepting the facts and violations in the SDR, the committee proposed additional penalties to the institution and former head coach. The institution accepted the additional penalties, but the former head coach did not. He objected to the two-year show-cause order proposed by the committee and requested an expedited penalty hearing pursuant to Bylaw 32.7.1.4.3. At the February 8, 2017, expedited penalty hearing, the former head coach provided context for his position that he should not be subject to any penalty. He argued that the proposed two-year show-cause order is not supported by this committee's past decisions and is disproportionately severe in light of the nature of his violations. The committee disagrees.

After considering the former head coach's position and the nature of the violations he agreed to in the SDR, the committee determines that the disputed two-year show-cause order is an appropriate penalty that is consistent with past cases. Through the SDR, the former head coach agreed that his conduct resulted in major and secondary violations of NCAA legislation, including the processing of institutional funds through personal bank accounts and the failure to promote an atmosphere for compliance within his program. This is consistent with the type of head coach conduct that has resulted in two- and three-year show-cause orders in previous cases. *See, e.g., Lenoir-Rhyne University (2016)* (prescribing a three-year show-cause order for impermissible benefits, unethical conduct and head coach responsibility violations); *Gannon University (2016)* (prescribing a three-year show-cause order for impermissible benefits, financial aid, unethical conduct and head coach responsibility violations); *University of Alaska, Anchorage (2014)* (prescribing a two-year show-cause order for impermissible benefits, unethical conduct and head coach responsibility violations); *Chadron State College (2013)* (prescribing a two-year show cause order for impermissible benefits and unethical conduct violations); *University of Southern Indiana (2011)* (prescribing a two-year show-cause order for a head coach responsibility violation).

In support of his claim that no show-cause penalty is warranted, the former head coach relied on a trio of cases the committee decided before the advent of head coach responsibility legislation: *Millersville University of Pennsylvania (2006)*, *Prairie View A&M University (2001)* and

California Polytechnic State University (1995). In these cases, the committee did not prescribe show-cause orders for violations the former head coach describes as more serious than his own. Notwithstanding the seriousness of the violations, however, the lack of head coach responsibility legislation is a critical distinction between these cases and the current case. In 2009, the Division II membership determined that head coaches should be held to a higher standard by adopting Bylaw 11.1.2.1, *Responsibility of Head Coach*. In so doing, the membership recognized the "special obligation" of the head coach "to promote a culture of compliance in the entire sport program." Division II Proposal—2009-4. Thus, at the time the committee decided *Millersville*, *Prairie View A&M* and *California Polytechnic*, the membership did not hold head coaches to the same elevated standards to which they are held today.

Here, in agreeing that his conduct violated Bylaw 11.1.2.1, the former head coach acknowledged that he failed to meet the membership's *current* standards for head coaches. Since adopting Bylaw 11.1.2.1 in 2009, the committee has prescribed at least a two-year show-cause order for nearly every head coach who has violated the bylaw.⁵ The former head coach did not demonstrate how his conduct differed from the conduct at issue in the committee's post-2009 head coach responsibility cases. Accordingly, the committee sees no reason to depart from these past cases.

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 Bylaws 19.01.3 and 32.1.3. 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, it will have no opportunity to appeal. The former head coach, who did not agree to the additional penalty proposed for him, will have the opportunity to appeal that penalty.

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 (Bylaw 19.5.2)

1. Public reprimand and censure.

⁵ In one post-2009 case, *Southwest Baptist University* (2012), the committee did not prescribe a show-cause order for a head coach who violated Bylaw 11.1.2.1. There, however, the underlying violation involved impermissible recruiting texts, not foundational financial control principles. Accordingly, consistent with the nature of the violations in that case, the committee prescribed ethics training, Regional Rules Seminar attendance and a two-game suspension for the head coach.

2. Two years of probation from March 10, 2017, through March 9, 2019.⁶
3. The institution shall pay a fine of \$2,500 to the Association.⁷
4. Pursuant to Bylaws 19.5.2-(g) and 31.2.2.4, and as it relates to agreed-upon Violation No. 2, the institution shall vacate all wins in which the ineligible women's soccer student-athlete competed.⁸ The period of ineligibility includes regular season and conference tournament competition and covers the time when she initially lost eligibility by receiving reduced admission to the institution's soccer camps through the time her eligibility was reinstated by the NCAA Reinstatement Staff. Further, if the student-athlete 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 ineligible women's soccer student-athlete shall also be vacated. Further, the institution's women's soccer records, as well as the records of the former head coach, 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. And 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 Coordination and Statistics office. The written report must be delivered to the office no later than 45 days following the release of this decision.

⁶ The institution proposed a one-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.

⁷ The institution proposed a \$1,500 fine.

⁸ Bylaw 19.5.2-(g) provides that "[v]acation of records when a student-athlete(s) has competed while ineligible" is particularly appropriate "when a case involved . . . direct or knowing involvement of a coach or high-ranking administrator . . . [or] ineligible competition when there is a finding or failure to monitor[.]"

5. During the 2017-18 academic year, the institution shall undergo a Compliance Blueprint Review. (Institution imposed) The committee further directs that 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.
6. The institution shall send a representative to an NCAA Regional Rules Seminar during 2017, 2018, 2019 and 2020. (Institution imposed) The committee further directs that the institution provide in its first annual compliance report a list of the sessions the representative attended at the seminar.
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 institutional staff members with responsibility for the certification of student-athlete eligibility for admission, financial aid, practice or competition;
 - b. Submit a preliminary report to the Office of the Committees on Infractions by April 30, 2017, setting forth a schedule for establishing this compliance and education program;
 - c. File with the Office of the Committees on Infractions annual compliance reports indicating the progress made with this program by January 15 of each year during the probationary period. Particular emphasis should be placed on the involvement of the institution's compliance staff in camps and clinics, including reviewing and approving brochures, approving rates and discounts, establishing and adhering to a system for processing camp fees and providing rules education to all institutional staff members involved in the institution's camps and clinics. The reports must also include documentation of the institution's compliance with the penalties adopted and prescribed by the committee;
 - d. Inform prospective women's soccer student-athletes in writing that the institution is on probation for two years and explain the violations committed. Such information must be provided to prospective women's soccer student-athletes for the full term of probation. Information to prospective women's soccer student-athletes 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 per Bylaw 13.3.1.2; 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, the affected sports 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 institutional media guides for all sports. 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 and nothing more is not sufficient.
8. The former head coach agreed that he held institutional funds in personal bank accounts, granted discounts to certain high school soccer teams who participated in institutional soccer camps and impermissibly compensated his assistant coach. Further, the former head coach agreed that he violated NCAA head coach responsibility legislation through his involvement in these violations.

Therefore, pursuant to Bylaw 19.5.2.2, the committee prescribes a two-year show-cause order for the former head coach. The show-cause period shall run from March 10, 2017, through March 9, 2019. Should the former head coach become employed at a member institution during the term the show cause is in effect, within 30 days of the former head coach's hiring, that employing institution shall contact the Office of the Committees on Infractions to make arrangements to show cause why restrictions on athletically related activity should not apply.

9. 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.
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As required by NCAA legislation for any institution involved in a major infractions case, Seattle Pacific University shall be subject to the provisions of 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 10, 2017. 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

John David Lackey
Julie A. Rochester, chair
Carey J. Snyder
Harry O. Stinson, III
Jane Teixeira
Christie L. Ward

APPENDIX

THE INSTITUTION'S CORRECTIVE ACTIONS AS IDENTIFIED IN THE OCTOBER 24, 2016, SUMMARY DISPOSITION REPORT.

1. The university placed the former head coach on paid administrative leave on December 18, 2014, while the university conducted an investigation. Following the initial investigation, the university terminated the former head coach's employment on January 8, 2015.
2. The university corrected the federal income tax reporting of the two cash payments made by the former head coach to the former assistant coach by reporting the payments as taxable wages to the former assistant coach.
3. The university now requires the women's soccer program to follow the same process as other programs for obtaining approval from athletics administrators for sports camp advertising materials, which facilitates oversight of pricing for individuals and teams. The university does not intend to permit discounts to groups at team camps unless such discounts are offered in accordance with NCAA interpretation of Bylaw 13.12.1.5.1.
4. Beginning in March 2015, camp registrations for all university athletics camps were required to be processed online. This allows for greater monitoring and accountability because athletics administrators will be able to track registration and it will not be solely the responsibility of the head coach of the sport. After each camp, athletics department administrative staff conduct a reconciliation to confirm the list of campers matches camper registrations and funds received.
5. The university also implemented a mandatory new approach for all athletics department staff for receiving and depositing cash and checks.
 - a. Starting in January 2015, the athletic department administrative assistant began opening all incoming mail prior to distribution to coaches. If cash or checks are included, a copy is made for the intended recipient, but all cash and checks are deposited by office staff.
 - b. In March 2015, a safe deposit box was mounted on the wall in the athletics department and in the Gymnastics Center for the immediate deposit of cash and checks. Funds must be deposited in the safe deposit boxes on the day they are received, and the safe deposit boxes are only accessible by two athletics administrative staff persons (no coaches). The boxes are emptied each weekday morning and deposited the same day.
6. During the 2016-17 academic year, the university will purchase and implement a software program that will facilitate compliance by enabling the university to track recruiting and camp activities for all of its teams. The university is currently exploring a software program produced by [athletics monitoring vendor].

7. The university will invite the assistant commissioner for the Great Northwest Athletic Conference to come and speak at a coaches meeting in the 2016-17 academic year about camps and NCAA compliance issues.
8. The university will complete an institutional self-study guide by June 1, 2017.
9. In December 2017, the university will engage in a triennial financial audit.