



URSINUS COLLEGE
PUBLIC INFRACTIONS DECISION
January 28, 2020

I. INTRODUCTION

The NCAA Division III Committee on Infractions (COI) is an independent administrative body comprised of individuals from the Division III membership and the public. The COI decides infractions cases involving member institutions and their staffs. This case involved financial aid violations that occurred when the former vice president and dean of enrollment management at Ursinus College improperly considered athletics participation and coaching staff input when formulating financial aid packages for prospective student-athletes.¹ The case also involved the institution's failure to monitor and exercise control over its athletics program. The COI 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). Because the parties agreed to the violations and proposed penalties, there is no opportunity to appeal.

The financial aid violations stemmed from the former vice president's strategy to increase enrollment by identifying prospective students who were most likely to enroll at Ursinus and awarding them additional need-based financial aid based on characteristics that included diversity, academics and athletics participation. In doing so, the former vice president and his staff impermissibly considered coaches' athletics ratings of prospects, among other criteria. He also communicated with coaches to solicit information about prospects, including the amount of financial aid necessary to gain their enrollment. As a result of these actions, during the 2017-18 and 2018-19 academic years, Ursinus awarded financial aid totaling \$335,300 to 64 student-athletes across 17 sport programs in a manner contrary to NCAA bylaws. The financial aid violations are major.

Additionally, Ursinus and the enforcement staff agreed that the scope and nature of the financial aid violations demonstrated that Ursinus lacked institutional control and failed to monitor the conduct and administration of its athletics program. Specifically, Ursinus did not provide adequate rules education to admissions and financial aid personnel, monitor the former vice president's conduct, or detect the consideration of athletics criteria and involvement of coaching staff in the financial aid process. These are major violations.

The COI accepts the parties' factual agreements and concludes that major violations occurred. Utilizing NCAA bylaws authorizing penalties, the COI adopts and prescribes the following

¹ A member of the Centennial Conference, Ursinus' total enrollment is approximately 1,450. The institution sponsors 13 women's sports and 12 men's sports. This is Ursinus' first major infractions case.

principal penalties: two years of probation, vacation of records, a \$2,500 fine, a Level II review, an outside audit and attendance at two NCAA Regional Rules Seminars.

II. CASE HISTORY

The violations in this case came to light in September 2018, when an associate director of student financial services reported to Ursinus' human resources department that the then vice president and dean of enrollment management (vice president) was not managing the financial aid process in accordance with NCAA legislation. Ursinus retained outside counsel to review the matter. Following an initial inquiry, the institution notified the enforcement staff of potential violations on September 19, 2018. Ursinus accepted the vice president's resignation that same day. The enforcement staff issued a written notice of inquiry on November 13, 2018.

Following a cooperative investigation, Ursinus, the vice president and the enforcement staff jointly submitted an SDR to the COI on October 21, 2019.² The COI began its review of the SDR on November 13, 2019, but determined that it required additional information to fully assess the agreed-upon violations and prescribe appropriate penalties. Thus, on November 20, 2019, pursuant to NCAA Bylaw 32.7.1.4.4, the COI asked Ursinus to provide the following: (1) additional information regarding the institution's methodology for repackaging the impermissible financial aid; and (2) confirmation that no current student-athletes were still receiving the impermissible aid. Ursinus provided the requested information and confirmation on December 4, 2019, and the COI completed its review of the SDR five days later.

The COI accepted the agreed-upon facts, violations and type of violations. The COI adopted Ursinus's self-imposed penalties but proposed the standard conditions of probation and a modification to the institution's self-imposed penalty regarding attendance at NCAA Regional Rules Seminars. The COI proposed these additional penalties on December 12, 2019, and Ursinus accepted them that same day.

III. PARTIES' AGREEMENTS

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

The parties jointly submitted an SDR that identified an agreed-upon factual basis, violations of NCAA legislation and type of violations.³ The SDR identified:

² Pursuant to Division III COI Internal Operating Procedure (IOP) 4-8-2-1, the COI in future cases may view this decision as less instructive than a decision reached after a contested hearing because violations established through the summary disposition process constitute the parties' agreement.

³ This decision provides the agreed-upon factual basis, violations and type of violations exactly as stated in the SDR, except for shortening references to the parties.

1. [NCAA Division III Manual Bylaws 15.01.2, 15.01.3, 15.4.1-(a) and 15.4.5 (2017-18 and 2018-19)]

Ursinus, the vice president and the enforcement staff agree that during the 2017-18 and 2018-19 academic years, the institution did not comply with NCAA bylaws when it awarded approximately \$335,300 of financial aid in a manner inconsistent with NCAA bylaws to 64 student-athletes across 17 sports contrary to NCAA financial aid legislation. In 10 of the 64 student-athletes' cases, the financial aid was actually reduced.⁴ Once student-athletes were repackaged eliminating athletics as a criterion it was determined that only \$13,482 in impermissible financial aid was awarded.⁵ Specifically, the vice president considered and directed admissions and financial aid personnel to consider athletics ability, participation and performance as a criterion in the formulation of financial aid packages. Additionally, the vice president involved and requested athletics staff members' input in the review of institutional financial assistance to be awarded to a student-athlete by soliciting information about the student-athlete, including the amount of aid necessary to gain their enrollment. The following chart displays the number of student-athletes and amounts of awards by sport:

Sport	Number of Student-Athletes	Total Amount Awarded Inconsistent with NCAA Bylaws	Total Amount of Impermissible Financial Aid
Football	30	\$227,600	\$4,310
Men's Track	5	\$15,800	\$0
Men's Swimming	1	\$12,000	\$0
Men's Lacrosse	2	\$10,700	\$7,288
Women's Gymnastics	1	\$9,000	\$1,109
Women's Swimming	4	\$8,800	\$0
Men's Basketball	4	\$8,500	\$0
Baseball	4	\$6,000	\$40
Women's Lacrosse	2	\$6,000	\$0
Women's Soccer	2	\$5,500	\$0
Softball	1	\$5,000	\$672
Women's Track	2	\$4,900	\$0
Women's Cross Country	1	\$4,000	\$0

⁴ It was determined that when the vice president separated student-athletes' files that he actually reduced some of those student-athletes by a total of \$65,300.

⁵ The institution's financial aid "matrix" during this time period was used for all students as a starting point for the awarding of aid. Over 60 percent of all students were packaged "off-matrix" during this time period.

Sport	Number of Student-Athletes	Total Amount Awarded Inconsistent with NCAA Bylaws	Total Amount of Impermissible Financial Aid
Women's Volleyball	1	\$4,000	\$0
Wrestling	2	\$3,000	\$0
Women's Basketball	1	\$2,500	\$153
Men's Cross Country	1	\$2,000	\$0
Grand Total	64	\$335,300	\$13,482

2. [NCAA Division III Manual Bylaws 2.1.1, 2.8.1 and 6.01.1 (2017-18 and 2018-19)]

Ursinus and the enforcement staff agree that the scope and nature of the violations set forth in Violation No. 1 demonstrate that during the 2017-18 and 2018-19 academic years, the institution failed to exercise institutional control and monitor the conduct and administration of its athletics program. Specifically, Ursinus failed to: (1) provide adequate NCAA rules education to the then admissions and financial aid personnel; (2) monitor the conduct of the then vice president and dean of enrollment management; (3) detect the consideration of athletics as a criterion in the formulation of financial aid packages; and (4) detect that athletics staff members were involved in the review of financial aid.

IV. REVIEW OF CASE

The SDR fully detailed the parties' positions and included the agreed-upon primary facts, violations and type of violations. After reviewing the parties' principal factual agreements and respective explanations surrounding those agreements, the COI accepts the SDR and concludes that major violations occurred. Specifically, the COI concludes that Ursinus violated NCAA financial aid legislation when, over a two-year period, the vice president considered athletics criterion and involved coaching staff when formulating financial aid packages. Ursinus agreed that the violations were attributable in part to its failure to provide adequate rules education to admissions and financial aid personnel and demonstrated a lack of institutional control and failure to monitor. The conduct at issue in this case violated Bylaw 15 and Articles 2 and 6 of the NCAA Constitution.

Bylaw 15 governs financial aid. Under Bylaws 15.01.2 and 15.4.1-(a), institutions may not consider athletics leadership, ability, participation or performance when formulating financial aid packages. Additionally, Bylaw 15.4.5 precludes athletics staff members from arranging or modifying financial aid packages for student-athletes and, more generally, from having any manner of involvement in reviewing institutional financial assistance for student-athletes. With respect to institutional responsibility, Constitution 2.8.1 obligates institutions to comply with all applicable rules and regulations of the NCAA and monitor their programs to assure compliance.

Additionally, Constitution 2.1.1 and 6.01.1 state that it is the responsibility of all member institutions to control the conduct of their athletics programs.

The Bylaw 15 financial aid violations in this case resulted from the vice president's efforts to boost enrollment numbers at Ursinus. During the 2017-18 and 2018-19 academic years, the vice president singled out prospective student-athletes—among other groups of prospective students—and looked for ways to increase their need-based financial aid in order to secure their enrollment. As part of this strategy, the vice president and his staff considered information provided by coaching staff members, including the coaches' athletic ratings of the prospects. The vice president did not necessarily provide additional aid to the highest-rated prospects; rather, he considered the athletics rating in combination with other financial information and data gathered by the admissions office. Thus, the vice president used the information to both increase and decrease financial aid for prospects. Specifically, he decreased 10 prospects' financial aid by a total of \$65,300.

In addition to athletics ratings, the vice president asked coaching staff to tell him the amount of aid necessary to gain certain prospects' enrollment. To this end, he also asked them for information regarding prospects' background, socio-economic status and other non-athletic characteristics that could justify increasing their need-based aid. The parties agreed that the consideration of athletics criteria and coaching involvement in financial aid packaging resulted in Ursinus awarding approximately \$335,300 of financial aid in a manner contrary to NCAA bylaws to 64 student-athletes across 17 sports during the 2017-18 and 2018-19 academic years.⁶ The involvement of coaching staff in formulating financial aid packages—even where the information they provided did not involve athletics criteria and did not result in the award of additional aid—violated Bylaw 15.4.5. Furthermore, in considering athletics participation and ratings in awarding aid, the vice president's conduct violated Bylaws 15.01.2 and 15.4.1-(a). The parties agreed—and the COI concludes—that these violations are major because they were not isolated, provided or were intended to provide more than a minimal recruiting advantage and included more than a minimal impermissible financial aid benefit.

It is a core principle of Division III that financial aid may not be based in any way on athletics criteria or involve athletics personnel. Consistent with this principle, as well as Bylaw 19.02.2, the COI has previously concluded that major violations of Bylaw 15 occur when institutions consider athletics participation and/or involve coaching staff in the packaging of financial aid. *See Northern Vermont University – Lyndon* (2019) (concluding major violations occurred when the institution considered athletics leadership when formulating financial aid packages for 17 student-athletes over a two-year period resulting in a total of \$19,250 in financial aid, and when it employed coaches as admissions counselors with involvement in awarding financial aid to student-athletes); *Elmhurst College* (2017) (concluding major violations occurred when the

⁶ After detecting the violations in this case, Ursinus repackaged the aid. Most student-athletes received the same financial aid package even when athletics participation was eliminated as a criterion. Once the financial aid was re-packaged, Ursinus determined that \$13,482 of impermissible aid was awarded to student-athletes in five sports. The institution gave those student-athletes the choice to no longer participate in athletics and maintain the same award or have their financial aid packages adjusted to eliminate the impermissible aid. Accordingly, no student-athletes are currently competing while receiving financial aid that was tainted by consideration of athletics criteria.

director of financial aid considered athletics participation in packaging financial aid for 26 student-athletes on 42 occasions over five years, resulting in a total of \$126,616 in impermissible aid); and *Baruch College* (2016) (concluding major violations occurred when the institution considered athletics criteria and allowed coaches to be involved in financial aid packaging, resulting in 30 student-athletes over a five-year period receiving impermissible financial aid awards and benefits totaling \$255,097). As in these cases, the vice president's conduct resulted in major violations of Bylaw 15.

The parties agreed that the scope and nature of the financial aid violations demonstrated that Ursinus failed to exercise institutional control and monitor the conduct and administration of its athletics program during the 2017-18 and 2018-19 academic years. These institutional failures manifested in three ways: (1) failure to provide adequate NCAA rules education to admissions and financial aid personnel; (2) failure to monitor the conduct of the vice president; and (3) failure to detect the consideration of athletics as a criterion in the formulation of financial aid packages and the involvement of coaching staff in the review of financial aid.

With respect to rules education, Ursinus agreed that it provided only basic and minimal education via email to the vice president and two of his direct reports—an admissions counselor/athletics liaison and the director of financial aid. These individuals did not receive formal education regarding NCAA financial aid legislation, and Ursinus agreed that they did not understand the full extent or applicability of Bylaw 15. The vice president did not know his actions were impermissible. He had previously worked in admissions roles at Division I and II institutions and had no prior experience with Division III rules. He was generally aware that Division III rules prohibit institutions from awarding athletics scholarships. However, he believed that any action he took with respect to financial aid packaging for student-athletes was permissible as long as the process was similar—and the aid proportionate—to that for non-student-athletes.

The institution provided more specific financial aid education to the coaching staff. The coaches clearly understood that they could not communicate with the financial aid director about any prospect's financial aid package and that aid could not be based in any way on athletics participation or ability. However, the coaches did not understand that communicating with the vice president was effectively the same as making a request to the financial aid director or that the vice president had independent authority to increase financial aid.

As it relates to monitoring and detecting violations, Ursinus agreed that it did not adequately monitor the vice president, his enrollment strategies or his oversight of the financial aid and admissions offices. The institution also acknowledged that it did not have the necessary monitoring mechanisms in place to detect the consideration of athletics criteria in packaging financial aid and did not take all necessary steps to prevent coaches' involvement in the review of financial aid.

By failing to provide adequate rules education, monitor the vice president and detect violations, Ursinus did not meet its obligations under Articles 2 and 6 of the NCAA Constitution to comply with all applicable rules of the Association and monitor and control its athletics program. It is

incumbent on Division III institutions to thoroughly educate and monitor *all* personnel who have a touchpoint on the financial aid process. Furthermore, although the vice president failed to seek guidance and ask questions when he should have, Ursinus should have had mechanisms in place to detect irregularities in the financial aid process. As a result of these failures, the institution awarded \$335,300 in a manner inconsistent with NCAA financial aid legislation and fundamental Division III principles.

Where institutions have had similar failures and financial aid violations resulted, the COI has concluded that the institutions failed to monitor and lacked institutional control. *See Lyndon* (concluding the institution failed to exercise control and monitor because the athletics department was aware that student-athlete financial aid could not be based on athletics participation but allowed it to happen anyway); *Elmhurst* (concluding the institution failed to exercise control and monitor because it did not provide adequate rules education and did not have mechanisms in place to detect the violations); and *Baruch* (concluding the institution failed to exercise control and monitor because it did not have processes and procedures for awarding financial aid and did not monitor the conduct of personnel involved in packaging financial aid). Furthermore, the COI concluded in each of these cases that the failure to exercise institutional control and monitor were major violations. Likewise, and pursuant to Bylaw 19.02.2, the COI concludes that Ursinus' violations were major. By allowing a significant amount of impermissible financial aid to be awarded undetected over a two-year period, Ursinus gained an advantage over institutions that followed the rules and monitored and controlled their programs.

V. PENALTIES

For the reasons set forth in Sections III and IV of this decision, the COI concludes this case involved major violations of NCAA legislation. Major violations are not isolated or inadvertent, provide or are intended to provide more than a minimal advantage and include a significant impermissible financial aid benefit.

In prescribing penalties, the COI evaluated relevant mitigating factors pursuant to Bylaw 32.7.1.3. In particular, the COI noted that Ursinus acted promptly once it discovered financial aid irregularities, immediately engaging outside counsel and notifying the enforcement staff of potential violations. Additionally, when the investigation demonstrated that the institution had awarded over \$300,000 in financial aid inconsistent with NCAA legislation, Ursinus went to great lengths to repackage the aid and ensure that all student-athletes who continued to receive impermissible aid either relinquished that aid or no longer competed. As a result of the institution's actions, only one student-athlete in men's lacrosse competed while ineligible.

The COI also considered Ursinus' cooperation in all parts of the case and determines it was consistent with the institution's obligation under Bylaw 32.1.3. Likewise, the COI considered Ursinus' corrective actions as set forth in Appendix One.

Finally, the COI reviewed past cases for guidance. The COI's decisions in *Lyndon*, *Elmhurst* and *Baruch* were particularly relevant because they involved the consideration of athletics criterion

and the involvement of coaching staff in formulating financial aid packages. The penalties in these cases generally included probationary periods ranging from two to four years, \$2,500 fines, vacation of records, required attendance at NCAA Regional Rules Seminars, outside audits and Level II reviews. In *Elmhurst* and *Baruch*, the COI also prescribed one-year show-cause orders for the involved individuals. The COI notes, however, that the involved individuals in those cases *intentionally* provided impermissible financial aid and therefore violated NCAA ethical conduct legislation. Here, by contrast, the vice president thought he was complying with NCAA legislation. Because the financial aid violations were unintentional, resulted in part from Ursinus' admitted failure to provide adequate rules education and did not support an unethical conduct violation, the COI determined that a show-cause order was not warranted for the vice president's conduct.

Because Ursinus and the vice president agreed to the facts and violations, and the institution agreed to all penalties, neither party has an opportunity to appeal pursuant to Bylaw 32.7.1.4.1. After considering all information, the COI prescribes the following penalties (self-imposed penalties are so noted):

Penalties for Major Violations (Bylaw 19.5.2)

1. Public reprimand and censure through the release of the public infractions decision.
2. Probation: Two years of probation from January 28, 2020, to January 27, 2022.⁷ During the period of probation, the institution shall:
 - a. Continue to develop and implement a comprehensive compliance and educational program on NCAA legislation to instruct coaches, the faculty athletics representative, all athletics department personnel and all institutional staff members with responsibility for ensuring compliance with NCAA legislation on certification and recruiting;
 - b. Submit a preliminary report to the Office of the Committees on Infractions (OCOI) by **March 15, 2020**, setting forth a schedule for establishing this compliance and educational program;
 - c. File with the OCOI annual compliance reports indicating the progress made with this program by **November 30** of each year of probation. Particular emphasis shall be placed on compliance with all Bylaw 15 legislation;
 - d. Inform all prospective student-athletes in writing that the institution is on probation for two years and detail the violations committed. The information shall be provided as soon as practicable after the prospect is recruited pursuant to Bylaw 13.02.8 and, in all instances, before the prospect signs a financial aid agreement or initially enrolls at the institution, whichever is earlier; and

⁷ Ursinus proposed a two-year probationary period. Institutions may propose probationary periods, but the authority to prescribe probation rests solely with the COI. Periods of probation always commence with the release of the infractions decision.

- 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 a direct, conspicuous link to the public infractions decision located on the athletic department's main webpage "landing page" and in the 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 case; and (iii) give members of the general public a clear indication of what happened in the case to allow the public (particularly prospects and their families) to make informed, knowledgeable decisions. A statement that refers only to the probationary period with nothing more is not sufficient.
3. Vacation of team and individual records: Ursinus agreed that one men's lacrosse student-athlete competed while ineligible as a result of his receipt of impermissible financial aid. Therefore, pursuant to Bylaws 19.5.2-(g) and 31.2.2.3, Ursinus shall vacate all regular season and conference tournament wins, records and participation in which the ineligible student-athlete competed from the time he became ineligible through the time he was reinstated as eligible for competition. (Self-imposed.) Further, if the ineligible student-athlete participated in NCAA postseason competition at any time he was ineligible, Ursinus' participation in the postseason contests in which the ineligible competition occurred shall be vacated. The individual records of the ineligible student-athlete shall also be vacated. However, the individual finishes and any awards for all eligible student-athletes shall be retained. Further, Ursinus' records regarding its athletics programs, as well as the records of the head men's lacrosse coach, shall reflect the vacated records and be recorded in all publications in which such records are reported, including, but not limited to, institutional media guides, recruiting material, electronic and digital media, plus institutional, conference and NCAA archives. Any institution which may subsequently hire the affected head coach shall similarly reflect the vacated wins in his career records documented in media guides and other publications cited above. Head coaches with vacated wins on their records may not count the vacated wins toward specific honors or victor "milestones" such as 100th, 200th or 500th career victories. Any public reference to the vacated records shall be removed from the athletics department stationery, banners displayed in public areas and any other forum in which they may appear. Any trophies awarded by the NCAA in men's lacrosse shall be returned to the Association.

Finally, to aid in accurately reflecting all institutional and student-athlete vacations, statistics and records in official NCAA publication 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 with a written report detailing those discussions. This written report will be maintained in the permanent files of the NCAA media coordination and statistics department. This written report must be delivered to the NCAA Media Coordination and Statistics office no later than 14 days following the release of this decision. A copy of the written report shall also be delivered to the OCOI at the same time.

4. Financial penalty: The institution shall pay a \$2,500 fine to the NCAA. (Self-imposed.)
 5. During the period of probation, the institution shall request a Level II review from the NCAA Division III Committee on Financial Aid and shall abide by any recommendations made by the reviewer. (Self-imposed.) The results of the review and steps taken to implement and abide by the recommendations shall be included in the institution's annual compliance reports.
 6. The institution engaged a third-party consulting firm to review its policies and procedures related to financial aid and provide recommendations regarding best practices. (Self-imposed.)
 7. The institution shall require representatives to attend each of the 2020 and 2021 NCAA Regional Rules Seminars. These institutional representatives shall include the current vice president and dean of enrollment management, director of financial aid, director of admissions, director of athletics and senior compliance administrator. No representative shall be required to attend more than one Regional Rules Seminar, but at least one representative shall attend in each year.⁸
 8. Prior to the conclusion of probation, the institution's president shall provide a letter to the COI 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, Ursinus 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, January 28, 2020. The COI further advises Ursinus that it should take every precaution to ensure that it observes the terms of the penalties. The COI will monitor Ursinus while it is on probation to ensure compliance with the penalties and terms of probation and may extend the probationary period, among other action, if Ursinus does not comply or commits additional violations. Likewise, any action by Ursinus contrary to the terms of the penalties or any additional violations shall be considered grounds for prescribing more severe penalties and/or may result in additional allegations and violations.

NCAA DIVISION III COMMITTEE ON INFRACTIONS

Christopher Bledsoe

Amy Hackett

Gerald Houlihan, Chair

Effel Harper

⁸ Ursinus proposed sending these five institutional representatives to either the 2020 or 2021 Regional Rules Seminar. The COI proposed a modification to this penalty, which the institution accepted, to ensure there is at least one institutional representative in attendance during each of these years.

APPENDIX ONE

**URSINUS COLLEGE'S CORRECTIVE ACTIONS AS IDENTIFIED IN THE
OCTOBER 21, 2019, SUMMARY DISPOSITION REPORT**

1. Ursinus repackaged all involved student-athletes' financial aid, removing from consideration the athletics component.
2. Ursinus accepted the vice president's resignation on September 19, 2018.
3. Ursinus will form a cross-functional interdepartmental Executive Committee to regularly address NCAA compliance issues and ensure communication related to NCAA compliance and processes are shared and understood by all relevant departments.
4. Ursinus will enhance its comprehensive education program on NCAA rules compliance and specifically include in this education plan regular reminders and educational outreach to individuals outside of athletics including admissions, financial aid and advancement.

APPENDIX TWO
Bylaw Citations

Division III 2017-18 Manual

2.1.1 Responsibility for Control. It is the responsibility of each member institution to control its intercollegiate athletics program in compliance with the rules and regulations of the Association. The institution's president or chancellor is responsible for the administration of all aspects of the athletics program, including approval of the budget and audit of all expenditures.

2.8.1 Responsibility of Institution. Each institution shall comply with all applicable rules and regulations of the Association in the conduct of its intercollegiate athletics programs. It shall monitor its programs to assure compliance and to identify and report to the Association instances in which compliance has not been achieved. In any such instance, the institution shall cooperate fully with the Association and shall take appropriate corrective actions. Members of an institution's staff, student-athletes, and other individuals and groups representing the institution's athletics interests shall comply with the applicable Association rules, and the member institution shall be responsible for such compliance.

6.01.1 Institutional Control. The control and responsibility for the conduct of intercollegiate athletics shall be exercised by the institution itself and by the conference(s), if any, of which it is a member. Administrative control or faculty control, or a combination of the two, shall constitute institutional control.

15.01.2 Improper Financial Aid. Any student-athlete who receives financial aid other than that permitted by the Association shall not be eligible for intercollegiate athletics.

15.01.3 Institutional Financial Aid. A member institution shall not award financial aid to any student on the basis of athletics leadership, ability, participation or performance.

15.4.1 Consistent Financial Aid Package. The composition of the financial aid package offered to a student-athlete shall be consistent with the established policy of the institution's financial aid office, regular institutional agency, office or committee for all students and shall meet all of the following criteria:

(a) A member institution shall not consider athletics leadership, ability, participation or performance as a criterion in the formulation of the financial aid package;

15.4.5 Athletics Staff Involvement. Members of the athletics staff of a member institution shall not be permitted to arrange or modify the financial aid package (as assembled by the financial aid officer or financial aid committee) and are prohibited from serving as members of member institutions' financial aid committees and from being involved in any manner in the review of the institutional financial assistance to be awarded to a student-athlete.

Division III 2018-19 Manual

2.1.1 Responsibility for Control. It is the responsibility of each member institution to control its intercollegiate athletics program in compliance with the rules and regulations of the Association. The institution's president or chancellor is responsible for the administration of all aspects of the athletics program, including approval of the budget and audit of all expenditures.

2.8.1 Responsibility of Institution. Each institution shall comply with all applicable rules and regulations of the Association in the conduct of its intercollegiate athletics programs. It shall monitor its programs to assure compliance and to identify and report to the Association instances in which compliance has not been achieved. In any such instance, the institution shall cooperate fully with the Association and shall take appropriate corrective actions. Members of an institution's staff, student-athletes, and other individuals and groups representing the institution's athletics interests shall comply with the applicable Association rules, and the member institution shall be responsible for such compliance.

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15.01.2 Improper Financial Aid. Any student-athlete who receives financial aid other than that permitted by the Association shall not be eligible for intercollegiate athletics.

15.01.3 Institutional Financial Aid. A member institution shall not award financial aid to any student on the basis of athletics leadership, ability, participation or performance.

15.4.1 Financial Aid Reporting Process. An institution shall submit an annual report that includes data regarding the financial aid packages awarded by the institution to freshmen and incoming transfer student-athletes and to other incoming students. The policies and procedures of the financial aid reporting process shall be established by the Financial Aid Committee and subject to approval by the Management Council.

15.4.5 Athletics Staff Involvement. Members of the athletics staff of a member institution shall not be permitted to arrange or modify the financial aid package (as assembled by the financial aid officer or financial aid committee) and are prohibited from serving as members of member institutions' financial aid committees and from being involved in any manner in the review of the institutional financial assistance to be awarded to a student-athlete.