

CASE SUMMARY

Shepherd failed to monitor its eligibility certification and financial aid processes

Eligibility certification and financial aid violations occurred at Shepherd across all sports over the course of two academic years, according to an agreement approved by the Division II Committee on Infractions. Due to the extensive nature of the violations, the school failed to monitor its eligibility certification and financial aid processes. The former compliance officer, Amy Bell, was personally responsible for the certification shortcomings.

In total, 44 student-athletes in 10 sports were permitted to practice or compete in 265 contests — and receive actual and necessary expenses or financial aid — while ineligible or not properly certified. The specific eligibility issues included student-athletes who were errantly permitted to:

- Practice and/or compete while not properly certified for amateurism.
- Practice and/or compete while not enrolled full time.
- Compete while not in good academic standing.
- Compete without having met transferable hours requirement after transferring from a two-year school or a four-year school.
- Receive athletics scholarships before being properly certified as eligible.

The violations largely occurred because Bell consistently departed from established policies and procedures for eligibility certification.

The school also impermissibly awarded approximately \$5,424 in scholarships above legislated limits to four student-athletes in three sports. As a result, the four student-athletes competed in 41 contests and received actual and necessary expenses while ineligible.

Additionally, the school failed to notify 282 student-athletes across 15 sports of the renewal or nonrenewal of their scholarships by the NCAA deadline. This included failing to notify five student-athletes in writing about the opportunity for a hearing regarding the reduction or nonrenewal of their scholarships.

The school and enforcement staff agreed that the school failed to monitor the compliance department, which under Bell's direction did not adhere to institutional processes for eligibility. Likewise, the school did not monitor its financial aid process for sending timely notification of renewals, reductions and cancellations and of student-athletes' opportunities for a hearing.

The enforcement staff considered alleging a lack of institutional control violation but agreed with the school that failure to monitor was more appropriate in this circumstance. Specifically, the violations occurred as a result of Bell's limited compliance

experience and failure to follow the school's established processes. Before Bell's employment and after her departure, the school met eligibility certification and financial aid requirements.

The parties agree to the following penalties:

- Two years of probation.
- Vacation of team and individual records in which ineligible players competed over the two-year period, including in baseball, football, men's soccer, men's basketball, men's tennis, women's basketball, softball, women's cross country, women's lacrosse and women's tennis.
- A \$5,000 fine.
- A one-year show-cause order for Bell, restricting her from athletically related responsibilities.

Members of the Committee on Infractions are drawn from the NCAA membership and public. The panel members who reviewed this case are:

- Amber Feldman, deputy commissioner of the Mid-America Intercollegiate Athletics Association.
- David Hansburg, director of athletics at Colorado School of Mines.
- Richard Loosbrock, professor of history at Adams State.
- Leslie Schuemann, deputy commissioner/senior woman administrator at the Great Midwest Athletic Conference.
- Jason Sobolik, assistant athletics director for compliance at Minnesota State University Moorhead.

NEGOTIATED RESOLUTION¹

Shepherd University – Case No. 020301

May 14, 2025

I. CASE SYNOPSIS

Shepherd University (Shepherd); Amy Bell (Bell), former assistant director of athletics for compliance; and the NCAA enforcement staff agree with the violations and penalties detailed below. The parties agree the case should be resolved as major for the institution and Bell.

Certification violations.

On September 7, 2023, the institution informed the enforcement staff of possible violations regarding certification and ineligible competition by student-athletes during the 2021-22 and 2022-23 academic years. During those years, the certification process was led by Bell, who abruptly resigned her employment with no advance notice in June 2023. While undertaking student-athlete certification for the 2023-24 academic year, the institution noticed several irregularities within the certification decisions from the previous two years and believed that multiple student-athletes had potential eligibility issues for the upcoming year.

After resolving the immediate eligibility issues and completing eligibility certification for the fall of 2023 semester, the institution initiated a comprehensive review of the eligibility certification process of the previous two academic years to determine the extent of the violations. As a part of the review, the institution recertified over 300 student-athletes. On February 6, 2024, the institution submitted the results of its inquiry to the enforcement staff. The institution concluded that (a) student-athletes were certified properly during and before the 2020-21 academic year under the institution's established policies and procedures; (b) nearly all violations occurred when Bell failed to undertake her responsibilities, including following the previously established institutional certification processes; and (c) the institution did not have sufficient checks and balances to ensure the compliance office did not isolate itself in executing the elements of eligibility certification.

On February 11, 2024, the enforcement staff began a collaborative investigation with the institution which confirmed the violations reported. The institution's program-wide review, along with further research conducted by the enforcement staff, identified 44 student-athletes across 10 sports who practiced, traveled and/or competed while not meeting eligibility requirements under a number of bylaws. Ineligible student-athletes competed in 265 contests (which include 15 post-season contests). These violations occurred because Bell consistently departed from the athletics department's established policies and procedures for eligibility certification that were in place when Bell was hired, including not convening the previously established certification committee, excluding the faculty athletics representative from certification-related decision making and failing to communicate and collaborate with the registrar's office during the certification process.

¹ In reviewing this agreement, the committee made editorial revisions pursuant to NCAA Division II Committee on Infractions (COI) Internal Operating Procedure (IOP) 4-7-1-2. These modifications did not affect the substance of the agreement.

Financial aid violations.

During the institution's investigation, in addition to recertifying numerous student-athletes, it also reviewed the awarding of athletics aid for potential issues during the two years in which the former assistant director of athletics was employed. The institution later discovered that four student-athletes were awarded with athletics aid in excess of their legislated individual limits, which led to additional instances of student-athletes competing while ineligible. The violations occurred when the institution failed to properly adjust the cost of attendance limits for these student-athletes. This was a systemic failure in the institution's financial aid office, not unique to only student athletes, and is primarily attributable to the institution on-boarding a new director of financial aid at approximately the same time the former assistant director of athletics began her role at the institution. Additionally, the institution failed to provide 282 student-athletes with notice of the renewal or non-renewal of their athletically related financial aid by the legislated deadline. Instead of providing this information on or before July 1 as required, the institution sent these notifications on or around July 25. Since five student-athletes returned the following year with cancelled or decreased athletics aid, additional violations occurred when the institution failed to notify them in writing of the opportunity for a hearing regarding the reduction or nonrenewal by the legislated deadline.

Failure to monitor.

The institution did not adequately supervise Bell to confirm she was accurately performing the requirements of her position or properly communicating and collaborating with others as established and successfully utilized in the athletics department policies and procedures for the certification process prior to Bell's tenure. Due to the failure to monitor, the institution did not notice the deficiencies in the procedures of how student-athletes were certified, and the resulting errors, during Bell's tenure. During the period of violations, athletics department leadership trusted that Bell was performing responsibilities of her job duties as they pertained to student-athlete eligibility certification and the accuracy of the certification information she provided but did not take reasonable steps to verify that Bell followed the athletics certification process according to the institution's established policies and procedures. Additionally, the institution failed to monitor the financial aid notification and renewal process to confirm it followed the requirements of NCAA bylaws by sending notices of renewal, reduction or cancelation of athletically related financial aid by the legislated deadline and apprising student-athletes of their opportunities for hearings regarding the changes. Ultimately, due to the institution's lack of oversight of Bell and not following its checks and balances in the eligibility certification and financial aid awarding and renewal processes, the violations went undetected during a two-year period.

II. PARTIES' AGREEMENTS

Agreed-upon findings of fact and violations of NCAA legislation.

1. [NCAA Division II Manual Bylaws 12.1.1.1, 12.1.1.1.3, 14.01.1, 14.1.7.1, 14.3.2.1, 14.4.3.1, 14.4.3.2, 14.4.3.4, 14.5.5.3.9, 14.11.1, 14.11.2.1, 14.12.1, 16.8.1, 31.2.2.4 and 31.2.2.5 (2021-22 and 2022-23); 15.1.1 (2022-23); and 14.5.4.3 (2022-23 and 2023-24)] (Major)

The institution, Bell and enforcement staff agree that during the 2021-22 through 2023-24 academic years,² the institution permitted 44 student-athletes in 10 sports to practice or compete in 265 contests and receive actual and necessary expenses and/or financial aid while ineligible or not certified. Specifically:

- a. During the 2021-22 and 2022-23 academic years, 12 student-athletes in seven sports practiced and competed while not certified for amateurism and/or initial eligibility. During these same academic years, an additional 10 student-athletes in two sports practiced, but did not compete, beyond 45 days without receiving final amateurism certification. [NCAA Bylaws 12.1.1.1, 12.1.1.1.3, 14.01.1 and 14.3.2.1 (2021-22 and 2022-23)]
- b. During the 2021-22 and 2022-23 academic years, seven student-athletes in three sports practiced and/or competed while enrolled less than full time at the institution. [NCAA Bylaw 14.1.7.1 (2021-22 and 2022-23)]
- c. During the 2021-22 and 2022-23 academic years, two student-athletes in two sports competed while not in good academic standing with the institution. [NCAA Bylaw 14.4.3.1 (2021-22 and 2022-23)]
- d. During the 2021-22 and 2022-23 academic years, three student-athletes in three sports competed without having passed nine hours during the previous academic term. [NCAA Bylaw 14.4.3.2 (2021-22 and 2022-23)]
- e. During the 2021-22 and 2022-23 academic years, nine student-athletes in six sports competed without having completed a minimum of 24 credits in the preceding two full-time academic terms. [NCAA Bylaw 14.4.3.4 (2021-22 and 2022-23)]

² The institution and enforcement staff only identified one violation that occurred during the 2023-24 academic year.

- f. During the 2022-23 and 2023-24 academic years, three student-athletes in three sports competed without having met the transferrable hours requirements for eligibility for competition upon transfer from a two-year institution, failing to complete specific course subjects required for immediate eligibility. [NCAA Bylaw 14.5.4.3 (2022-23 and 2023-24)]
- g. During the 2021-22 and 2022-23 academic years, two student-athletes in two sports competed without having met transferrable hours requirements for eligibility for competition upon transfer from a four-year institution. [NCAA Bylaws 14.5.4.3 and 14.5.5.3.9 (2021-22 and 2022-23)]
- h. During the 2021-22 and 2022-23 academic years, the institution did not complete eligibility checklists for eight sports. [NCAA Bylaws 14.11.1, 14.11.2 and 14.11.2.1 (2021-22 and 2022-23)]
- i. During the 2022-23 academic year, nine student-athletes in four sports received impermissible institutional athletics aid prior to being certified as eligible by the NCAA Eligibility Center. [NCAA Bylaw 15.1.1 (2022-23)]

This agreed-upon finding of fact serves as part of the basis for Agreed-Upon Finding of Fact No. 3.

- 2. [NCAA Division II Manual Bylaws 14.12.1, 15.3, 15.5.2.4, 15.5.5.1 and 16.8.1 (2021-22 and 2022-23)] (Major)

The institution and enforcement staff agree that during the 2021-22 and 2022-23 academic years, the institution improperly awarded a total of approximately \$5,424 of excessive athletics aid above the legislated individual limits to four student-athletes in three sports and failed to notify 282 student-athletes across 15 sports of the renewal or non-renewal of their athletically related financial aid by the NCAA legislative deadline.³ As a result of the excessive financial aid, the four student-athletes competed in 41 occasions and received actual and necessary expenses while ineligible. Specifically:

- a. During the 2021-22 and 2022-23 academic years, the institution awarded four student-athletes in three sports athletically related financial aid exceeding their individual cost of attendance limits.⁴ NCAA limits on team totals were not exceeded. [NCAA Bylaw 15.3 (2021-22 and 2022-23)]

³ NCAA team limits were not exceeded in any sports.

⁴ The institution on-boarded a new director of financial aid in the same month that it on-boarded Bell. During these two years, the financial aid office operated with inadequate precision in establishing a correct cost-of-attendance figure. This general operating deficiency was applied to accounts of numerous students and was not specific to student-athletes.

Sport	Years	Total
Men's basketball Student-Athlete 1	2021-22	\$785
Women's basketball Student-Athlete 1	2021-22	\$426
Women's basketball Student-Athlete 2	2021-22	\$1,986
Football Student-Athlete 1	2022-23	\$2,227
Total Overage:		\$5,424

- b. Following the 2021-22 and 2022-23 academic years, the institution failed to notify 282 student-athletes in writing whether their institutional athletics aid was renewed or not renewed for the following academic year by the July 1 deadline. As a result, the institution failed to notify five student-athletes in writing of the opportunity for a hearing regarding the reduction or nonrenewal of their institutional athletics aid by the legislated deadline. [NCAA Bylaws 15.5.2.4 and 15.5.5.1 (2021-22 and 2022-23)]

This agreed-upon finding of fact serves as part of the basis for Agreed-Upon Finding of Fact No. 3.

3. [NCAA Division II Manual Constitution 2.8.1 (2021-22) and Bylaw 7.01.10 (2022-23)] (Major)

The institution and enforcement staff agree that during the 2021-22 and 2022-23 academic years,⁵ the scope and nature of the violations detailed in Agreed-Upon Finding of Fact Nos. 1 and 2 demonstrate that the institution violated the NCAA principle of rules compliance when it failed to adequately monitor its student-athlete certification and financial aid awarding processes to ensure compliance with NCAA eligibility and financial aid legislation. Specifically, during these two academic years, the institution failed to follow its written institutional processes, including systems of checks and balances for student-athlete eligibility certification and financial aid, which would have identified the inadequacies and lack of communication by Bell in carrying out the certification process. These shortcomings resulted in multiple student-athletes participating while ineligible.

III. OTHER VIOLATIONS OF NCAA LEGISLATION SUBSTANTIATED; NOT ALLEGED

None.

⁵Because only one of the underlying certification violations occurred during the 2023-24 academic year and its occurrence was not indicative of any continuing issue, the parties agree that the 2023-24 year should be excluded from the institution's failure to monitor violation.

IV. REVIEW OF OTHER ISSUES

The enforcement staff considered whether to allege a lack of institutional control in this case but the parties agree that a failure to monitor violation is more appropriate. The violations primarily were limited to a two-year period when Bell had significant responsibility over certification and awarding of aid. The institution fell short of its monitoring responsibilities during this period when it failed to notice that Bell, who had limited experience in NCAA compliance, failed to perform all certification responsibilities and deviated from the institution's established policies and procedures in this area. However, the investigation revealed that, in the years prior to the period of violations, institutional personnel followed the institution's eligibility certification and financial aid processes and the institution complied with NCAA legislation in these areas. Additionally, the institution acted quickly to investigate and address the violations when concerns arose. When the violations were discovered, the institution consulted with their former associate director of athletics for compliance/senior woman administrator and subsequently hired a new compliance officer, both of whom conducted a full audit of its compliance systems for the previous two years. As a result, the parties agree that the violations are attributable to the inexperience and judgment of one person coupled with inadequate monitoring of certification and financial aid processes during that time.

V. PARTIES' AGREED-UPON PENALTIES⁶

Pursuant to NCAA Bylaw 19.10.3-(e), the parties agree to the following penalties:

Penalties for Major Violations (Bylaw 19.12.4)

1. Public reprimand and censure through the public release of the negotiated resolution agreement.
2. Two years of probation from **May 14, 2025, through May 13, 2027.**⁷
3. 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 financial aid and certification legislation.

⁶ All penalties must be completed during the time periods identified in this decision. If completion of a penalty is impossible during the prescribed period, the institution shall make the Committee on Infractions aware of the impossibility and must complete the penalty at the next available opportunity.

⁷ Institutions must serve probation during the prescribed penalty period.

- b. Submit a preliminary report to the Office of the Committees on Infractions (OCOI) by **July 1, 2025**, 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 March 1st, during each year of probation. Particular emphasis shall be placed on rules education and monitoring related to amateurism and initial academic eligibility.
 - d. Inform prospects in the baseball, football, men's soccer, men's basketball, men's tennis, women's basketball, softball, women's cross country, women's lacrosse and women's tennis programs in writing that the institution is on probation for two years and detail the violations committed. If a prospect 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 prospect signs an institutional financial aid agreement.
 - 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 athletics department's main webpage "landing page" and in the media guides for the baseball, football, men's basketball, men's soccer, men's tennis, women's basketball, softball, women's cross country, women's lacrosse and women's tennis programs. 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.
4. The institution shall pay a fine of \$5,000 to the NCAA.
 5. Vacation of team and individual records: Ineligible participation in the baseball, football, men's soccer, men's basketball, men's tennis, women's basketball, softball, women's cross country, women's lacrosse and women's tennis sport programs occurred over primarily a two-year time period as a result of violations in this case. Therefore, pursuant to Bylaws 19.12.4-(f), 19.12.4.6 and 19.12.4.7, the institution shall vacate all regular season and conference tournament wins, records and participation in which the ineligible student-athletes competed from the time they became ineligible through the time they were reinstated as eligible for competition. Further, if the ineligible student-athletes participated in NCAA postseason competition at any time they were ineligible, the institution's participation in the postseason contests in which the ineligible competition occurred shall be vacated. The individual records of the ineligible student-athletes shall also be vacated.

However, the individual finishes and any awards for all eligible student-athletes shall be retained. Further, the institution's records regarding the affected sport programs, as well as the records of the head coaches, 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 that may subsequently hire the affected head coaches shall similarly reflect the vacated wins in his/her 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 victory "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 the affected sport programs shall be returned to the Association.

Finally, to aid in accurately reflecting all institutional and student-athlete vacations, statistics and records 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 media coordination and statistics office with a written report detailing those discussions. This written report will be maintained in the permanent files of the media coordination and statistics office. The written report must be delivered to the office no later than 30 days following the release of this decision or, if the institution appeals the vacation penalty, at the conclusion of the appeals process. A copy of the written report shall also be delivered to the OCOI at the same time.

6. The institution has already undertaken a review of its athletics policies and procedures regarding initial amateur and academic eligibility certification, as well as the temporary period of errant calculations within the Financial Aid Office. The institution shall continue with a full review of its compliance policies and procedures by an outside entity and implement all recommendations made by the reviewers and shall provide a copy of the reviewer's report in its annual compliance report.
7. Following the receipt of the final compliance report and prior to the conclusion of probation, the institution's president shall provide a letter to the Committee on Infractions affirming that the institution's current athletics policies and practices conform to all requirements of NCAA regulations.
8. Show-cause order: Bell was involved in violations of eligibility and certification rules. Therefore, Bell shall be subject to a one-year show-cause order pursuant to Bylaw 19.12.4.1. The show-cause order shall be in effect from **May 14, 2025, through May 13, 2026**. In accordance with Bylaw 19.12.4.1 and Committee on Infractions Internal Operating Procedure 5-17-1-1 during the show-cause period any employing member

institution shall restrict Bell from any athletically related position within the institution's department of athletics.⁸

If Bell becomes employed by a member institution in an athletically related position within the institution's department of athletics during the one-year show-cause period, the employing institution shall abide by the terms of the show-cause order unless it contacts the office of the Committee on Infractions to make arrangements to show cause why the terms of the order should not apply.

VI. OTHER AGREEMENTS

The parties agree that this case will be processed through the NCAA negotiated resolution process as outlined in Bylaw 19.10, and the Committee on Infractions will review the negotiated resolution. The parties acknowledge that the negotiated resolution contains agreed-upon findings of fact of NCAA violations based on information available at this time. Nothing in this resolution precludes the enforcement staff from investigating additional information about potential rules violations. The parties agree that the violations identified in this agreement occurred and should be classified as major.

If the Committee on Infractions approves the negotiated resolution, the institution and Bell agree that they will take every precaution to ensure that the terms of the penalties are observed. The institution and Bell acknowledge that they have or will impose and follow the penalties contained within the negotiated resolution, and these penalties are in accordance with those prescribed in Bylaw 19.12.

The OCOI will monitor the penalties during their effective periods. Any action by the institution or Bell contrary to the terms of any of the penalties or any additional violations may be considered grounds for prescribing more severe penalties or may result in additional allegations and violations. Additionally, as required by NCAA legislation for any institution involved in a major infractions case, Shepherd shall be subject to the provisions of Bylaw 19.12.4.4 concerning repeat violators for a five-year period beginning on the effective date of the penalties in this case, May 14, 2025.

The parties acknowledge that this negotiated resolution may be voidable by the Committee on Infractions if any of the parties were aware or become aware of information that materially alters the factual information on which this negotiated resolution is based.

⁷ The terms of the show-cause order are not intended to prohibit Bell from performing the responsibilities of positions outside an institution's athletics department with limited athletically related duties (i.e., verifying financial aid information, being involved in the process for student-athlete admissions, academic advising of a student-athlete if employed by a department outside of the athletics department, etc.).

The parties further acknowledge that the Committee on Infractions, subsequent to its review of the negotiated resolution, may reject the negotiated resolution. Should the Committee on Infractions reject the negotiated resolution, the parties understand that the case may be submitted through a summary disposition report (Bylaw 19.9) or notice of allegations (Bylaw 19.8) and prior agreed-upon terms of the rejected negotiated resolution will not be binding.

VII. DIVISION II COMMITTEE ON INFRACTIONS APPROVAL

Pursuant to Bylaw 19.10.6, the COI approves the parties' negotiated resolution agreement. The COI's review of this agreement is limited. The COI may reject a negotiated resolution agreement only if the agreement is not in the best interests of the Association or if the agreed-upon penalties are manifestly unreasonable. *See* Bylaw 19.10.4. In this case, the COI determines that the agreed-upon facts, violations, and type of violations are appropriate for this process. The agreed-upon penalties align with the penalties available under Bylaw 19.12 and with past case guidance. Pursuant to Bylaw 19.10.6, this negotiated resolution has no precedential value.

The COI advises Shepherd and Amy Bell that they should take every precaution to ensure that they observe the terms of the penalties. The COI will monitor the institution 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 the institution does not comply or commits additional violations. Likewise, any action by the institution and/or Bell contrary to the terms of any 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 II COMMITTEE ON INFRACTIONS

Amber Feldman
David Hansburg
Richard Loosbrock, Chair
Leslie Schuemann
Jason Sobolik

APPENDIX

SHEPHERD UNIVERISTY'S CORRECTIVE ACTIONS

The institution will or has taken the following corrective actions:

1. Increased ongoing collaboration between the Athletics Compliance Officer with the Registrar's Office and Faculty Athletics Representative to ensure proper academic certification of all student-athletes prior to the start of each academic term.
2. Reinstated the Compliance Committee comprised of representatives from the Registrar's Office, Financial Aid, Admissions, Director of Academic Advising, Director of Academic Support, Director of Residence Life and the Faculty Athletic Representative.
3. Will require representatives from the Registrar's Office and Financial Aid Office to review presentations from the NCAA Regional Rules Seminar.
4. Developed a more detailed job description and timeline for completion of certifications for the certifying officer which defines responsibilities of that position and its important role in NCAA eligibility certification.
5. Completed department-wide, focused compliance training and will continue to educate coaches, staff, faculty, and student-athletes on policies and procedures related to compliance. More specifically:
 - Athletics Department staff will receive monthly compliance education at department staff meetings on critical legislation, changes to legislation, and more. Subsequent email communication to the staff monthly supporting this rules education will be implemented.
 - Coaches will complete one additional Learning Portal Module per month for one year to enhance education on critical topics.
 - A compliance education page will be created on shepherdrams.com to house critical information to educate student-athletes and staff.
 - Beginning- and end-of-the-year meetings with student-athletes on compliance education will occur.
 - Monthly compliance education with SAAC will occur.
 - A formalization of the internal educational (and punitive, if appropriate) process following the discovery of a NCAA violation.
 - Rules interpretations will be e-mailed to staff that cite appropriate bylaws.
6. Retained an outside entity to conduct a thorough review of the institution's eligibility certification process and review means to reduce the likelihood that one individual can circumvent the process.