CASE SUMMARY

Whittier violated financial aid rules

Violations occurred when Whittier awarded 11 international soccer student-athletes with institutional gift financial aid that — when combined with costs paid by their home country — equated to full cost-of-attendance scholarships for those individuals during the 2024-25 academic year, according to an agreement released by the Division III Committee on Infractions.

The school and the NCAA enforcement staff agreed that Whittier's enrollment office, to increase enrollment, encouraged the international recruitment team to specifically target students from Sweden, in part due to a Swedish government program that awarded approximately $23,000 to Swedish citizens pursuing a college degree. The international recruitment team at Whittier partnered with two athletics recruiting agencies, which connected the school to international soccer prospects from Sweden. To secure the enrollment of 11 individuals, the university's vice president of enrollment exercised discretion and offered each approximately $47,141 in financial aid. When combined with the approximately $23,000 provided by the Swedish government, the institutional gift aid for each individual equated to full cost of attendance.

Because no other student or student-athlete at Whittier received close or equivalent to full cost of attendance, the institutional gift aid violated Division III's financial rules. The aid was clearly distinguishable from the general pattern of all financial aid for all other recipients at the school. Due to a lack of rules education, the school did not know at the time that the financial aid violated NCAA rules.

As a result of the violations, the parties also agreed that the school failed to monitor its financial aid process to ensure that packages were awarded consistently.

The agreed-upon penalties include:
- One year of probation.
- A $2,500 fine.
- A Level II review by the Financial Aid Committee.
- A requirement that institutional staff must complete educational programming.

Members of the Committee on Infractions are drawn from the NCAA membership and public. The members who reviewed this case are:
- Angela Givens Williams, member of the public.
- Ellen O'Brien, deputy director of athletics and senior woman administrator at Marymount (Virginia).
- Tom Simmons, director of athletics at Ohio Northern.
- Matt Tanney, associate vice president and director of athletics at Denison and chair of the committee.

NEGOTIATED RESOLUTION[1]

Whittier College – Case No. 020568

September 4, 2026

I. CASE SYNOPSIS

Whittier College and the NCAA enforcement staff agree with the violations and penalties detailed below.

Origin of the case.

On March 2, 2026, as part of the 2025-26 Division III Financial Aid Reporting Program, the NCAA Division III Financial Aid Committee notified the institution of its distinguishable pattern of awarding financial aid for the 2024-25 academic year, which resulted in an advantage for student-athletes, and referred the case to the enforcement staff for additional review. Specifically, the Financial Aid Committee concluded that 11 soccer student-athletes were the only students in the 2024-25 cohort to receive institutional gift aid totaling $47,141, the highest amount awarded. When the institutional gift aid award was combined with outside support ($23,000), the total equated to the full cost of attendance. On March 26, 2026, the enforcement staff contacted the institution and began a collaborative investigation.

Origin of the violations.

Entering the 2024-25 academic year, the institution faced an enrollment crisis and sought options to increase enrollment. Accordingly, the institution's enrollment office emphasized recruiting prospective students from Sweden due to the Swedish government providing approximately $23,000 annually to support Swedish citizens pursuing postsecondary education. Subsequently, the institution's international recruitment team partnered with two athletics recruiting agencies that connected the institution with prospective student-athletes in Sweden seeking educational opportunities in the United States.

As a result of the initiative, eight men's and three women's soccer student-athletes applied and were admitted to the institution for the 2024-25 academic year. To secure their enrollment, the vice president of enrollment exercised discretion and awarded all 11 student-athletes an identical institutional gift aid package of $47,141. When combined with approximately $23,000 in Swedish government support, the total assistance covered the institution's full cost of attendance. Because no other student or student-athlete received financial aid equal to the full cost of attendance, the institution's awarding of gift aid to the 11 international soccer student-athletes violated NCAA financial aid legislation.

[1] In reviewing this agreement, the committee made editorial revisions pursuant to NCAA Division III Committee on Infractions (COI) Internal Operating Procedure (IOP) 4-8-1-2. These modifications did not affect the substance of the agreement.

In the absence of NCAA rules education or established policies and procedures for departments responsible for recruiting prospective students and awarding financial aid, the institution did not recognize that their efforts resulted in financial aid violations.

II. PARTIES' AGREEMENTS

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

1. [NCAA Division III Bylaw 15.3.1-(c) (2024-25)] (Major)

During the 2024-25 academic year, the institution impermissibly awarded eight international men's and three international women's soccer student-athletes with financial aid packages that were clearly distinguishable from the general pattern of all financial aid for all recipients at the institution. Specifically, to provide awards equivalent to the full cost of attendance, the institution awarded each of the 11 international soccer student-athletes $47,141 in gift aid in addition to the $23,000 provided in Swedish government assistance. However, the institution did not award any other incoming students with gift aid packages close or equivalent to the full cost of attendance.

2. [NCAA Division III Bylaw 20.15.2 (2024-25)] (Major)

During the 2024-25 academic year, the scope and nature of the violations detailed in the Agreed-Upon Findings of Fact No. 1 demonstrate that the institution failed to adequately monitor the awarding of financial aid to ensure compliance with NCAA financial aid legislation. Specifically, the institution did not provide rules education or establish policies and procedures to prevent or detect violations related to financial aid.

III. OTHER VIOLATIONS OF NCAA LEGISLATION SUBSTANTIATED; NOT ALLEGED

None.

IV. REVIEW OF OTHER ISSUES

None.

V. PARTIES' AGREED-UPON PENALTIES[2]

Pursuant to NCAA Bylaw 32.9.3-(e), the following penalties apply:

1. Public reprimand and censure through the public release of the negotiated resolution agreement.

2. Probation: One year of probation from **September 4, 2026, through September 3, 2027**.[3]

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 recruiting and creating financial aid.;

   b. Submit a preliminary report to the Office of the Committees on Infractions (OCOI) by **October 15, 2026**, 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 **July 1st**, during each year of probation. Particular emphasis shall be placed on rules education and monitoring related to financial aid;

   d. Inform prospects in the men's and women's soccer programs in writing that the institution is on probation for one year 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;

   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 website "landing page" and in the media guides for the men's and women's soccer programs. Permissible website posting locations include the main navigation menu or a sidebar menu. The link may not be housed under a drop-down menu. Further,

[2] 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 NCAA Division III Committee on Infractions aware of the impossibility and must complete the penalty at the next available opportunity.

[3] Institutions must serve probation during the prescribed penalty period.

the link to the posting (i.e., the icon or the text) must be titled "NCAA Infractions Case." With regard to the content of the posting, 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. During the period of probation, the institution shall request a Level II review from the Financial Aid Committee and shall abide by any recommendations made by the reviewer. The results of the review and steps taken to implement and abide by recommendations shall be included in the institution's annual compliance reports.

5. The institution shall pay a fine of $2,500 to the NCAA.

6. During the period of probation, the vice president of enrollment and institutional staff members responsible for enrollment initiatives and/or awarding financial aid must complete compliance education programming with the NCAA staff.

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 NCAA Division III Committee on Infractions affirming that the institution's current athletics policies and practices conform to all requirements of NCAA regulations.

VI. OTHER AGREEMENTS

The enforcement staff and institution believe that this case will be processed through the NCAA negotiated resolution process as outlined in Bylaw 32.9.

The enforcement staff notified the institution, and the institution agrees with the following:

- The negotiated resolution contains 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.
- Pursuant to Bylaw 19.02.2.3, the violations identified in this agreement occurred and should be classified as Major.
- If the Committee on Infractions approves the negotiated resolution, the involved parties will take every precaution to ensure that the terms of the penalties are observed.
- The involved parties 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 19.5.

- The OCOI will monitor the penalties during their effective periods.
- Any action by the involved parties 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.
- This negotiated resolution may be voidable by the Committee on Infractions if any of the involved parties were aware or become aware of information that materially alters the factual information on which this negotiated resolution is based.
- 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 Committee on Infractions will issue instructions for processing of the case pursuant to hearing resolution (Bylaw 32.10) or summary disposition (Bylaw 32.8) and prior agreed-upon terms of the rejected negotiated resolution will not be binding.
- Should the Committee on Infractions approve the negotiated resolution, there are no additional NCAA hearing and appellate opportunities.

VII. DIVISION III COMMITTEE ON INFRACTIONS APPROVAL[4]

Pursuant to Bylaw 32.9.6, 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 32.9.7. 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 32.9 and with past case guidance. Pursuant to Bylaw 32.9.6, this negotiated resolution has no precedential value.

The COI advises Whittier that it should take every precaution to ensure that it observes 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 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.

[4] Based on the facts of this case and in recognition that the parties agreed to penalties for major violations of financial aid legislation, the COI approves the NR. The COI remains concerned with the institution's lack of provision of education to its staff and its failure to have policies and procedures related to financial aid awarding, which led to violations of longstanding Division III legislation. Understanding that NRs are not precedential, the COI does not believe the penalties in this case, and particularly the one-year period of probation, are manifestly unreasonable or not in the best interests of the Association. To the greatest extent possible, penalties—particularly those involving similar conduct and/or violations—should align unless there are unique facts and circumstances warranting different outcomes. In those cases, the unique facts and circumstances should be expressly identified in the NR.

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NCAA DIVISION III COMMITTEE ON INFRACTIONS

Ellen O'Brien
Thomas Simmons
Matthew Tanney, chair
Angela Givens-Williams