Self-Study Items

1. List all "conditions for certification" imposed by the committee in its Cycle 2 certification decision (if any) as they relate to Operating Principle 3.1 (Gender Issues). For each condition, provide:

   a. The original "condition" imposed;
   b. The action(s) taken by the institution;
   c. The date(s) of the action(s); and
   d. An explanation for any partial or noncompletion of such required actions.

Please note, the institution is not required to respond to opportunities for enhancement developed by the peer-review team unless those same items were adopted by the committee.

**Conditions for Certification**

**OP 3.1 – Gender Issues**

<table>
<thead>
<tr>
<th>Condition</th>
<th>Action</th>
<th>Action Date</th>
<th>Explanation for Partial or Non-Completion</th>
</tr>
</thead>
<tbody>
<tr>
<td>No conditions for certification were imposed in Cycle 2</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

2. Report on the implementation of the plan for improvement to address gender issues developed by the institution during its Cycle 2 certification process. For each issue identified, provide:

   a. The original goal(s);
   b. The step(s) taken by the institution to achieve the goal(s);
   c. The date(s) the step(s) was completed; and
   d. An explanation for any partial or noncompletion of the original goal(s) and/or step(s) to achieve the goal.

The committee will not accept the following explanations for partial or noncompletion:

1. The institution did not possess sufficient funds to implement the plan.
2. The institution has had personnel changes since the original development of the plan.
3. The institution does not have documentation of actions taken to implement the plan.

The committee will accept the following explanation for partial completion or noncompletion:

1. The institution has implemented a different plan(s) to achieve the same goal outlined in its Cycle 2 gender-issues plan.
The institution must demonstrate that it has implemented its Cycle 2 gender-issues plan or provide an explanation for partial completion of the plan.

1. The committee will not accept the following explanations for partial completion or noncompletion:
   1. The institution did not possess sufficient funds to implement the plan.
   2. The institution has had personnel changes since the original development of the plan.
   3. The institution does not have documentation of actions taken to implement the plan.

2. The committee will accept the following explanation for partial completion or noncompletion:
   - The institution has implemented a different plan(s) or taken a different action(s) to achieve or maintain progress towards the same goal outlined in its Cycle 2 gender-issues plan.

Within gender-issues and diversity-issues written plans, specific numerical targets may place an institution at legal risk and are not expected in an institution's written plan, particularly as it relates to hiring practices. Institutions may develop plans that have broad, flexible non-numeric hiring goals. As it relates to the program areas, including but not limited to participation rates and budget increases, specific numerical targets may be appropriate.

Response:
3. Describe any additional plans for improvement/recommendations developed by the institution since the Cycle 2 certification decision was rendered by the committee for Operating Principle 3.1 (Gender Issues). For each additional plan, provide:

   a. The additional goal(s);
   b. The step(s) taken by the institution to achieve the goal(s); and
   c. The date(s) the step(s) was completed.

Response:

No additional plans for improvement/recommendations have been developed since Cycle 2

4. Explain how the institution is organized to further its efforts related to the gender-issues operating principle for both department of athletics staff, coaches and student-athletes.

Response:

The organization of The University of Montana (UM) ensures that efforts related to gender issues are furthered for and by all the Department of Intercollegiate Athletics (IA) staff, including coaches, and all student-athletes.

The Athletic Director (AD) reports directly to the President.

The Senior Associate Athletic Director (SAAD) oversees all women’s sports and reports directly to the Athletic Director (AD). The SAAD also holds responsibility for rules compliance and student support services; in that capacity, she supervises the compliance assistant, Athletic Academic Services (AAS) and staff (including the Coordinator of AAS and IA Academic Advisor), the Rhinehart Athletic Training Center (RATC) and staff, and the Performance Center.

The SAAD’s compliance responsibility covers UM, NCAA, and Big Sky Conference rules. On any compliance matters, the SAAD also reports to UM’s NCAA Faculty Athletic Representative (FAR), who is an ex-officio member of the UM University Athletic Committee (UAC). The UAC is a broad-based campus committee appointed by the UM President to provide review and counsel for Intercollegiate Athletics. The SAAD brings gender issues to the UAC for such review and counsel as needed.

Additional institutional support related to gender issues comes from the offices of Equal Opportunity and Affirmative Action, Human Resource Services, and the Vice President for Student Affairs.
5. Describe how matters concerning gender equity for department of athletics staff, coaches and student-athletes are monitored, evaluated and addressed on a continuing basis.

**Response:**

Matters concerning gender equity for the University of Montana (UM) Department of Intercollegiate Athletics (IA) coaches and other staff and for student-athletes are monitored, evaluated, and addressed on a continuing basis utilizing the following:

UM Equal Opportunity and Affirmative Action Office,
UM Human Resource Services,
UM Student Conduct Code,
*Grizzly Athletics Student-Athlete Handbook* (pp. 35-40),
*Grizzly Athletics Departmental Policies & Procedures* manual,
Sexual Harassment Policy (UM Policy 406.5.1),
Sexual Misconduct, Sexual Relationship Violence, and Stalking Policy (UM Policy 406.5),
Breastfeeding Policy (UM Policy 406.7),
Dependent Care – Workplace Alternatives Policy (UM Policy 402.1),
Discrimination Grievance Policy (UM Policy 407.1),
Equal Opportunity Policy/Non-Discrimination (UM Policy 406.4),
NCAA Gender Equity Manual and other Title IX resources,
UM University Athletic Committee, and
IA personnel, in particular the Athletic Director, Senior Associate Athletic Director, and Compliance Assistant.

The policies and procedures listed above guide decision-making at all levels of the organization, and provide processes for addressing gender equity matters. These policies and procedures can both guide decision-making to prevent the occurrence of gender equity issues and can guide institutional reaction to them.

The student-athlete handbook, UM Student Conduct Code, and the IA departmental manual are mechanisms for more directly communicating these policies and procedures to student-athletes and the intercollegiate athletics personnel.

The offices and University personnel identified above routinely monitor and evaluate gender equity matters and enforce the policies and/or apply the appropriate procedures depending on the situation.

From 1994 through 2001, the UM President oversaw a voluntary U.S. Office for Civil Rights (OCR) Title IX review which required the University to provide annual reports to the OCR on UM’s status pertaining to gender equity. The University received its letter of closure in January 2002, stating that it was in full compliance with Title IX under the interests-and-abilities prong.

More recently, the University underwent a voluntary Title IX Compliance Self-Audit, which was completed in October 2010.

[exhibits]
http://www.umt.edu/eo/
http://www.umt.edu/hrs/
http://life.umt.edu/vpsa/student_conduct.php
Grizzly Athletics Departmental Policies & Procedures manual [need link or appendix ref.]
http://www.montanagrizzlies.com/pages/?p=98 [need new link or ref. to appendix]
http://www.umt.edu/Policies/400-HumanResources/sexualharassment.aspx
6. Describe the programs and activities that the institution has in place for coaches, department of athletics staff and student-athletes that address gender issues, including programs and activities designed to address the needs of the underrepresented gender within the athletics program.

_The institution must demonstrate that it provides programs and activities for coaches, department of athletics staff and student-athletes that address gender issues, including programs and activities designed to address the needs of the underrepresented gender within the athletics program._

_Response:_

The University of Montana (UM) provides programs and activities that address gender issues for all campus community members. Department of Intercollegiate Athletics (IA) coaches and other staff and student-athletes are eligible to attend. Examples of these programs include: Day of Dialogue, Women’s Resource Center, Student Assault Resource Center (SARC), Health Enhancement, Human Resource Services - Quality Work Life, Women’s and Gender Studies Program, etc.

[exhibits]

http://life.umt.edu/dod/
http://www.umt.edu/wcenter/
http://life.umt.edu/curry/SARC/
http://life.umt.edu/curry/HEALTHE
http://www.umt.edu/hrs/qualityworklife/
http://www.cas.umt.edu/wsprog/

7. For the three most recent academic years in which information is available, analyze the institution's EADA report (i.e., participation, head coaches and assistant coaches). [Note: the institution must include all male and female NCAA intercollegiate sports programs offered at the institution in its analysis]. If any differences exist, the institution must explain (using supporting data) and address any deficiencies in the gender-issues plan for improvement.

_The institution must analyze its EADA report (i.e., participation, head coaches and assistant coaches) and NCAA financial report (specified expense categories) for the three most recent academic years, explain (using supporting data) any differences, address any deficiencies and comment on any trends._

_Response:_

The analysis of the institution's EADA reports (i.e., participation, head coaches, and assistant coaches) resulted in the following:
**Athletic Participation**

Participation in the women’s and men’s programs is not proportionate to the number of female and male undergraduates at the University; undergraduate women represent 52 percent of the overall population and 40 percent of the participating athletes.

<table>
<thead>
<tr>
<th>Sport</th>
<th>Men</th>
<th>2008</th>
<th>2009</th>
<th>2010</th>
<th>Average</th>
</tr>
</thead>
<tbody>
<tr>
<td>Basketball</td>
<td>17</td>
<td>14</td>
<td>15</td>
<td>15</td>
<td></td>
</tr>
<tr>
<td>Football</td>
<td>119</td>
<td>119</td>
<td>113</td>
<td>117</td>
<td></td>
</tr>
<tr>
<td>Golf</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td></td>
</tr>
<tr>
<td>Soccer</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td></td>
</tr>
<tr>
<td>Tennis</td>
<td>11</td>
<td>11</td>
<td>13</td>
<td>12</td>
<td></td>
</tr>
<tr>
<td>Track &amp; Cross Country</td>
<td>115</td>
<td>115</td>
<td>115</td>
<td>115</td>
<td></td>
</tr>
<tr>
<td>Volleyball</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td></td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td>245</td>
<td>245</td>
<td>241</td>
<td>259</td>
<td>60% overall</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Sport</th>
<th>Women</th>
<th>2008</th>
<th>2009</th>
<th>2010</th>
<th>Avg.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Basketball</td>
<td>15</td>
<td>16</td>
<td>16</td>
<td>16</td>
<td></td>
</tr>
<tr>
<td>Football</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td></td>
</tr>
<tr>
<td>Golf</td>
<td>9</td>
<td>8</td>
<td>9</td>
<td>9</td>
<td></td>
</tr>
<tr>
<td>Soccer</td>
<td>25</td>
<td>29</td>
<td>30</td>
<td>28</td>
<td></td>
</tr>
<tr>
<td>Tennis</td>
<td>10</td>
<td>9</td>
<td>10</td>
<td>10</td>
<td></td>
</tr>
<tr>
<td>Track &amp; Cross Country</td>
<td>98</td>
<td>99</td>
<td>98</td>
<td>98</td>
<td></td>
</tr>
<tr>
<td>Volleyball</td>
<td>15</td>
<td>14</td>
<td>13</td>
<td>14</td>
<td></td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td>172</td>
<td>175</td>
<td>176</td>
<td>174</td>
<td>40% overall</td>
</tr>
</tbody>
</table>

**UM undergraduates**

<table>
<thead>
<tr>
<th></th>
<th>2008</th>
<th>2009</th>
<th>2010</th>
<th>Avg</th>
<th>Avg. Athletic Participation</th>
</tr>
</thead>
<tbody>
<tr>
<td>Men</td>
<td>48%</td>
<td>48%</td>
<td>48%</td>
<td>48%</td>
<td>60%</td>
</tr>
<tr>
<td>Women</td>
<td>53%</td>
<td>52%</td>
<td>52%</td>
<td>52%</td>
<td>40%</td>
</tr>
</tbody>
</table>

There has been a continuing underrepresentation of women among the student-athletes vis-à-vis the student population. To increase women’s participation, the University will:

- Add Women’s Softball, with the expectation of hiring head and assistant coaches in FY13 and competition beginning in academic year 2013-14.
- Add and maintain roster spots to women’s soccer, bringing the total to 28 participants; maintain availability in women’s track at 50 spots; and manage the rosters of football (at 100, down from 105) and men’s track (at 45, down from 50).

**Head and Assistant Coaches**

With 21 coaches available to serve 259 male student-athletes, the ratio of head and assistant coaches to student athletes is approximately 1:12. For females, the total number of student-athletes is 174 with 17 coaches, for a ratio of coaches to student-athletes of approximately 1:10. The overall ratio of coaches available to male and female athletes is within two FTE. There are no significant disparities that would adversely affect the underrepresented sex in any particular sport.
### Average Number of Coaches and Athletes from 2008-2010 EADA Reports

<table>
<thead>
<tr>
<th>Athletic Program</th>
<th>Number of Athletes</th>
<th>Head Coaches</th>
<th>Assistant Coaches</th>
<th>FTE Ratio</th>
</tr>
</thead>
<tbody>
<tr>
<td>Men’s Basketball</td>
<td>15</td>
<td>1</td>
<td>3</td>
<td>3.75</td>
</tr>
<tr>
<td>Football</td>
<td>117</td>
<td>1</td>
<td>9</td>
<td>11.7</td>
</tr>
<tr>
<td>Track/Cross-country</td>
<td>115</td>
<td>1</td>
<td>4</td>
<td>23</td>
</tr>
<tr>
<td>Men’s Tennis</td>
<td>12</td>
<td>1</td>
<td>0</td>
<td>12</td>
</tr>
<tr>
<td><strong>TOTAL</strong></td>
<td><strong>259</strong></td>
<td><strong>4</strong></td>
<td><strong>17</strong></td>
<td><strong>12.33</strong></td>
</tr>
<tr>
<td>Women’s Basketball</td>
<td>16</td>
<td>1</td>
<td>3</td>
<td>4</td>
</tr>
<tr>
<td>Golf</td>
<td>9</td>
<td>1</td>
<td>0</td>
<td>9</td>
</tr>
<tr>
<td>Soccer</td>
<td>28</td>
<td>1</td>
<td>2</td>
<td>9.33</td>
</tr>
<tr>
<td>Track/Cross-country</td>
<td>98</td>
<td>1</td>
<td>4</td>
<td>19.6</td>
</tr>
<tr>
<td>Women’s Tennis</td>
<td>10</td>
<td>1</td>
<td>0</td>
<td>10</td>
</tr>
<tr>
<td>Volleyball</td>
<td>14</td>
<td>1</td>
<td>2</td>
<td>4.67</td>
</tr>
<tr>
<td><strong>TOTAL</strong></td>
<td><strong>174</strong></td>
<td><strong>6</strong></td>
<td><strong>11</strong></td>
<td><strong>10.24</strong></td>
</tr>
</tbody>
</table>

**Compensation**

This analysis considers the allocation of funds for coaching the men’s and women’s programs as reported in UM’s fiscal year 2008, 2009, and 2010 NCAA financial reports (categories 19 and 20), which includes all coaching staff and their respective gross salaries, bonuses and benefits, and any compensation paid to the coaching staff by a third party contractually guaranteed by the institution.

<table>
<thead>
<tr>
<th></th>
<th>2010</th>
<th>2009</th>
<th>2008</th>
</tr>
</thead>
<tbody>
<tr>
<td>Men’s</td>
<td>63%</td>
<td>59%</td>
<td>63%</td>
</tr>
<tr>
<td>Women’s</td>
<td>37%</td>
<td>41%</td>
<td>37%</td>
</tr>
<tr>
<td>% salary expense by gender</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>% participants by gender</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

On average, the total coaching compensation expenditure for the last three years has been $1,512,163 for the men’s programs and $944,174 for the women’s programs -- 62 percent and 38 percent, respectively, of the total for all sports. The average participation rates of men and women in the athletic program are 60 percent and 40 percent respectively. Thus, there is only a 2 percentage-point difference between the average coaching budget allocated to the women’s program (38 percent) and the average rate of participation in the women’s athletic program (40 percent).

This two percentage-point difference may be explained by coaches’ salaries in the football program, which alone accounts for more than one-third (37 percent) of the overall budget for IA coaches’ salaries (head and assistant). Women’s and men’s basketball account for approximately 36 percent and all other sports combined (golf, soccer, tennis, track & field, cross-country, and volleyball) represent 27 percent of the total. This pattern is consistent across the Big Sky Conference and nationally and may be addressed, and alleviated, as more coaches are hired for new women’s sports.
8. For the three most recent academic years in which information is available, analyze the institution's NCAA financial report (specified expense categories). [Note: the institution must include all male and female NCAA intercollegiate sports programs offered at the institution in its analysis]. If any differences exist, the institution must explain (using supporting data) and address any deficiencies in the gender-issues plan for improvement.

*The institution must analyze its EADA report (i.e., participation, head coaches and assistant coaches) and NCAA financial report (specified expense categories) for the three most recent academic years, explain (using supporting data) any differences, address any deficiencies and comment on any trends.* [underscore added]

**Response:**

The NCAA financial reports define *Expenses* as the costs attributable to intercollegiate athletic activities including the following: appearance guarantees and options, athletically related student aid, contract services, equipment, fundraising activities, operating expenses (i.e., game-day expenses), promotional activities, recruiting expenses, salaries and benefits, supplies, travel, and any other expenses attributable to intercollegiate activities. An analysis of the 2008, 2009, and 2010 reports revealed the University is within 2 to 3 percentage points when comparing the expenditure and athletic participation percentages by gender.

Not surprisingly, the men’s program consistently incurs greater expenses than its proportion of participation (60 percent). This is primarily due to the men’s football program, which accounts for almost one-third of the overall expenses. The proposed addition of a women’s sport (Women’s Softball) will alleviate some of the disproportionate impact in favor of the underrepresented gender.

<table>
<thead>
<tr>
<th>Three-Year Comparison of Expenses from NCAA Financial Reports</th>
</tr>
</thead>
<tbody>
<tr>
<td>2010</td>
</tr>
<tr>
<td>------</td>
</tr>
<tr>
<td>% expense by gender</td>
</tr>
<tr>
<td>Men's</td>
</tr>
<tr>
<td>62%</td>
</tr>
<tr>
<td>59%</td>
</tr>
</tbody>
</table>

9. Using the program areas for gender issues:

a. Describe how the institution has ensured a complete study of each of the 15 program areas. This study must be conducted as part of the self-study process;

b. Provide data demonstrating the institution's status and commitment, including resource allocation, across each of the 15 areas;

c. Using the data provided in (b) above, analyze and explain how the institution is meeting the needs of the underrepresented gender within the athletics program (any differences should be clearly explained in the institution's narrative response, including any deficiencies the institution identifies in its analysis) [Note: the institution must include all male and female NCAA intercollegiate sports programs offered at the institution in its program area analysis]; and

d. Explain how the institution's written, stand-alone plan for gender issues addresses each of the 15 areas, including any deficiencies identified in the institution's narrative response as listed in item (c) above.

*The institution must conduct a thorough and written review of each of the 15-program areas for gender issues. Please see program area definitions located in the Gender, Diversity and Student-Athlete Well-Being attachment of the self-study instrument. If the institution identifies any deficiencies during this review, the deficiencies must*
be incorporated into the institution's gender-issues plan for improvement. If no deficiency exists, the institution must include a maintenance plan for each program area and action steps the institution will take if the program area(s) becomes inequitable in the future.

The review must: Describe how the institution has ensured a complete study of each of the 15-program areas for gender issues. This study should be conducted as part of the self-study process. Please note that for the program area of accommodations of interests and abilities, the use of surveys alone does not constitute a complete study. If an institution chooses to use an interest survey (e.g., a web survey or hard-copy survey) as one of its sources of data, the committee will require an explanation regarding the survey content, populations surveyed, the survey response rate, method used to interpret the data, and written evidence demonstrating the institution’s Title IX coordinator has approved the survey. In addition, the institution must describe other methods of measuring interest and ability.

1. Provide data demonstrating the institution's status and commitment, including resource allocation, across each of the areas;
2. Using the data provided in (b) above, analyze and explain how the institution is meeting the needs of the underrepresented gender within the athletics program. Please note, any differences should be clearly explained in the institution's narrative response, including any deficiencies the institution identifies in its analysis; and
3. Explain how the institution's written, stand-alone plan for gender issues addresses each of the 15-program areas, including any deficiencies identified in the institution's narrative response as listed in (c) above.

Program Areas:

1. Accommodation of Interests and Abilities. Participation proportionate to enrollment; and/or, history and continuing practice of program expansion for the underrepresented gender within the athletics program; and/or, full and effective accommodation for the underrepresented gender within the athletics program; and equivalent levels of competition. Institutions must clearly identify methods (e.g., proportionality, history of program expansion, etc.) for addressing accommodation of interests and abilities when presenting gender-issues plans for the future.

(a) Describe how the institution has ensured a complete study of the program area. This study must be conducted as part of the self-study process.

The University of Montana (UM) Department of Intercollegiate Athletics (IA) has ensured a complete study of the program areas through a two-phase comprehensive review process, largely but not exclusively in preparation for the NCAA Cycle 3 Certification Self-Study.

Phase one of the review was initiated by the Senior Associate Athletic Director (SAAD) to explore adding a female sport (or two), and to determine whether the University was providing equal treatment to males and females in all intercollegiate athletic programs. For this, the SAAD requested a Title IX Compliance Self-Audit from the UM Equal Opportunity and Affirmative Action (EO/AA) Office. The EO/AA Director and a UM Legal Counsel paralegal commenced data collection in spring 2010 and concluded with a report issued in October 2010 (see Appendix ?, Report and Recommendations for Title IX Compliance). Evidence collected and analyzed included the following: relevant athletic department and institutional documents; a survey of the coaching staff, administrators, and two student athletes per sport (see Appendix ?, Sample Title IX Compliance Self-Audit Instruments); interviews with select personnel; and a facilities site visit.

The NCAA Cycle 3 Certification Operating Principle 3.1 Gender Issues Subcommittee (see Appendix ?, Plan for Conducting the NCAA Division I Athletics Certification Self-Study)
conducted phase two of the self-study, beginning its review in early November 2010. The Subcommittee confirmed, or rejected, the Title IX Compliance Self-Audit findings as each related to the Operating Principle 3.1 Gender Issues, and it performed additional data collection and analysis as recommended in the self-audit and to satisfy their requirements for data-driven conclusions.

The Subcommittee gathered additional evidence through interviews and questionnaires distributed to a sample of coaches, staff, student-athletes, and personnel outside of the IA department. The Subcommittee also conducted a comprehensive document analysis, including but not limited to the items reviewed during the self-audit. Lastly, the Subcommittee toured the athletic facilities located on the mountain and south campuses.

Whether the University is meeting its effective accommodation obligation was determined by using the standard Title IX three-part test, which allows an institution to choose any one of the following to meet its obligation to provide nondiscriminatory athletic participation opportunities.

1. Provide intercollegiate level participation opportunities for male and female students in numbers substantially proportionate to their respective enrollments; or

2. Where the members of one sex have been and are underrepresented among intercollegiate athletes, show a history and continuing practice of program expansion which is demonstrably responsive to the developing interests and abilities of the members of that sex; or

3. Where the members of one sex are underrepresented among intercollegiate athletes, and the institution cannot show a history and continuing practice of program expansion, as described above, demonstrate that the interests and abilities of the members of that sex have been fully and effectively accommodated by the present program.

(b) Provide data demonstrating the institution's status and commitment across the program area.

Whether the University is meeting its effective accommodation obligation was determined by using the standard Title IX three-part test, which allows an institution to choose any one of the following to meet its obligation to provide nondiscriminatory athletic participation opportunities.

1. Provide intercollegiate level participation opportunities for male and female students in numbers substantially proportionate to their respective enrollments; or

2. Where the members of one sex have been and are underrepresented among intercollegiate athletes, show a history and continuing practice of program expansion which is demonstrably responsive to the developing interests and abilities of the members of that sex; or

3. Where the members of one sex are underrepresented among intercollegiate athletes, and the institution cannot show a history and continuing practice of program expansion, as described above, demonstrate that the interests and abilities of the members of that sex have been fully and effectively accommodated by the present program.

When applying this test for Accommodation of Interests and Abilities the following data demonstrates the institution is not adequately meeting any of the parts of the three-part test.
Test 1 - Substantially Proportional Participation Opportunities

According to the NCAA Financial Reports, in 2008 men accounted for about 48 percent of UM’s full-time undergraduate population. The 2008 Equity in Participation report reveals 60 percent of the IA student-athletes are men. Women accounted for about 52 percent and 40 percent, respectively, a 12 percentage point difference between population and participation for the women. In 2009, the situation was essentially the same: men accounted for 48 percent of the undergraduates and 60 percent of the student-athletes, and women accounted for about 52 percent and 40 percent, respectively, a difference for the women of about 12 percentage points. In 2010, the trend continued with men accounting for 48 percent of the undergraduates and 59 percent of the student-athletes. Women constituted approximately 52 percent of UM undergraduates and 41 percent student-athletes, a difference of 11 percentage points.

Test 2 - Continuing Practice of Program Expansion

Under part two, the University cannot show a continuing practice of program expansion which is demonstrably responsive to the developing interests and abilities of females. As discussed below, the University cannot show that it has adequately assessed the developing interests and abilities of females.

Test 3 - Effective Accommodation of Interests and Abilities

In April 2010, the U.S. Office of Civil Rights (OCR) clarified the application of part three of the three part test. Institutions must assess whether there is an unmet interest in a particular sport; whether there is sufficient ability to sustain a team in the sport; and whether there is a reasonable expectation of competition for the team. If the answer to these three questions is “yes,” the institution is not compliant with part three of the test.

The OCR guidance is clear that an institution may not rely on a survey of students alone to adequately assess the interest and abilities of the underrepresented sex (April 20, 2010 OCR Letter). The suggestions for survey questions provided by OCR to ask incoming, first-time females admitted to the University were incorporated into the July 2010 “Survey of Sports Interest & Abilities of The University of Montana – Missoula Undergraduates” conducted by the UM Bureau of Business and Economic Research. This is an improvement in the comprehensive process of assessing interest and abilities for purposes of Title IX compliance (see Appendix ?, insert title). The University is required to evaluate interest through comprehensive surveys and regular assessment of improvement based on previous surveys; participation in interscholastic sports; participation rates in high schools, amateur athletic associations and community sports leagues; requests by students that a sport be added or complaints by students; participation opinions of coaches, administrators and athletes. OCR recommends that institutions develop procedures for and maintain documentation from routine monitoring of participation of the underrepresented sex in club and intramural programs, community sports, high school athletic programs, and amateur athletic programs.

Similarly, there are multiple indicators for assessment of ability. The University should assess the athletic experience and accomplishments in interscholastic, club or intramural competition; whether there is potential to sustain an intercollegiate team based on opinions of coaches, athletes and administrators; as well as records of previous competitions of club and intramural teams. Other indicators might include participation in other sports that demonstrate skills or abilities fundamental to a particular sport being considered. Also relevant are tryouts or other direct observations of participation in the particular sport in which there is interest.
The University should have effective and ongoing procedures for collecting, maintaining, and analyzing information about the interests and abilities of students of the underrepresented sex, including easily understood and well publicized policies and procedures for responding to requests for additional teams.

In March 2011, the University made significant progress toward meeting the requirements of the third test by creating the Title IX and Gender Equity Committee. The charge of the committee is:

To serve as an advisory body to the President on issues related to Title IX and gender equity in UM’s intercollegiate athletics, recreation and club sports programs; to field requests from campus and the community regarding the addition of sports; to develop an effective method of surveying skills, interests and abilities (the 3rd prong) and annually evaluate those survey results; to routinely monitor and document participation levels of the underrepresented sex in club, intramural, high school, amateur and community sports programs; to conduct an annual review of the gender equity plan; to provide review, direction, and support in the development of plans to enhance gender equity in athletics and compliance with Title IX; and to educate campus on gender equity issues.

Executive oversight of the committee falls to the President of the University. The committee is composed of twelve members and two ex-officio members, with representation from each of the following: Intercollegiate Athletics (Coach); Faculty Senate; Staff Senate; Associated Students of The University of Montana; Student-Athlete Advisory Committee; Human Resource Services; Enrollment Services; Office of Planning, Budget, and Analysis; Campus Recreation/Intramurals; Greek Life; Women’s and Gender Studies; and the Missoula community (Missoula Public School Administration). The two ex-officio members are the Senior Associate Athletic Director and the Director of the Equal Opportunity/Affirmative Action Office.

(c) Using the data provided in (b) above, analyze and explain how the institution is meeting the needs of the underrepresented gender in the athletics program (any differences should be clearly explained in the institution's narrative response, including any deficiencies the institution identifies in its analysis).

Whether the University is meeting its effective accommodation obligation was determined by using the standard Title IX three-part test, which allows an institution to choose any one of the following to meet its obligation to provide nondiscriminatory athletic participation opportunities.

(1) Provide intercollegiate level participation opportunities for male and female students in numbers substantially proportionate to their respective enrollments; or

(2) Where the members of one sex have been and are underrepresented among intercollegiate athletes, show a history and continuing practice of program expansion which is demonstrably responsive to the developing interests and abilities of the members of that sex; or

(3) Where the members of one sex are underrepresented among intercollegiate athletes, and the institution cannot show a history and continuing practice of program expansion, as described above, demonstrate that the interests and abilities of the members of that sex have been fully and effectively accommodated by the present program.

The University does not meet part one or part two of the test and is deficient in the third regarding adequately assessing the interests and abilities of students of the underrepresented sex (females).
For UM to be in compliance, it must develop a mechanism for conducting a comprehensive and continuing interest and ability analysis, which is part of the charge of the Title IX and Gender Equity Committee. The other area of potentially deficient compliance that overlaps with the interest and ability analysis is that there needs to be a thorough review of policies and procedures required by Title IX. In particular, there needs to be a well-publicized procedure to allow students to petition for inclusion of a sport in the IA program, a process for assessing such request, an appeal process, and a method to keep records of such requests. Although not fully implemented, there has been significant progress toward meeting the requirements of the third test for accommodation of interests and abilities with the establishment of the Title IX and Gender Equity Committee. When the charge of the committee is fully realized the University will meet the third part of the Title IX three-part test.

The charge of the Title IX and Gender Equity Committee established in March 2011 is:

“To serve as an advisory body to the President on issues related to Title IX and gender equity in UM’s intercollegiate athletics, recreation and club sports programs; to field requests from campus and the community regarding the addition of sports; to develop an effective method of surveying skills, interests and abilities (the 3rd prong) and annually evaluate those survey results; to routinely monitor and document participation levels of the underrepresented sex in club, intramural, high school, amateur and community sports programs; to conduct an annual review of the gender equity plan; to provide review, direction, and support in the development of plans to enhance gender equity in athletics and compliance with Title IX; and to educate campus on gender equity issues.”

(d) Explain how the institution's written, stand-alone plan for gender issues addresses the program area, including any deficiencies identified in the institution's narrative response as listed in item (c) above.

Whether the University is meeting its effective accommodation obligation was determined by using the standard Title IX three-part test, which allows an institution to choose any one of the following to meet its obligation to provide nondiscriminatory athletic participation opportunities.

(1) Provide intercollegiate level participation opportunities for male and female students in numbers substantially proportionate to their respective enrollments; or

(2) Where the members of one sex have been and are underrepresented among intercollegiate athletes, show a history and continuing practice of program expansion which is demonstrably responsive to the developing interests and abilities of the members of that sex; or

(3) Where the members of one sex are underrepresented among intercollegiate athletes, and the institution cannot show a history and continuing practice of program expansion, as described above, demonstrate that the interests and abilities of the members of that sex have been fully and effectively accommodated by the present program.

The University does not meet part one or part two of the test and is deficient in the third regarding adequately assessing the interests and abilities of students of the underrepresented sex (females).

The following are the measurable goals identified by the institution to effectively meet its accommodation obligation:
1. add women’s softball (begin 2011, fully implemented by 2014);
2. create a campus Title IX and Gender Equity committee (fully functioning by May 2011);
3. conduct Interest and Abilities survey and review results, annually as of 2011; and
4. increase the ratio of female participation by 2-3 percentage points by fall 2011.

2. Athletics Scholarships. Scholarship dollars to be awarded to women and men at the same proportion as their respective rate of participation in the intercollegiate athletics program.

   (a) Describe how the institution has ensured a complete study of the program area. This study must be conducted as part of the self-study process.

   The University of Montana (UM) Department of Intercollegiate Athletics (IA) has ensured a complete study of the program areas through a two-phase comprehensive review process, largely but not exclusively in preparation for the NCAA Cycle 3 Certification Self-Study.

   Phase one of the review was initiated by the Senior Associate Athletic Director (SAAD) to explore adding a female sport (or two), and to determine whether the University was providing equal treatment to males and females in all intercollegiate athletic programs. For this, the SAAD requested a Title IX Compliance Self-Audit from the UM Equal Opportunity and Affirmative Action (EO/AA) Office. The EO/AA Director and a UM Legal Counsel paralegal commenced data collection in spring 2010 and concluded with a report issued in October 2010 (see Appendix ?, Report and Recommendations for Title IX Compliance). Evidence collected and analyzed included the following: relevant athletic department and institutional documents; a survey of the coaching staff, administrators, and two student athletes per sport (see Appendix ?, Sample Title IX Compliance Self-Audit Instruments); interviews with select personnel; and a facilities site visit.

   The NCAA Cycle 3 Certification Operating Principle 3.1 Gender Issues Subcommittee (see Appendix ?, Plan for Conducting the NCAA Division I Athletics Certification Self-Study) conducted phase two of the self-study, beginning its review in early November 2010. The Subcommittee confirmed, or rejected, the Title IX Compliance Self-Audit findings as each related to the Operating Principle 3.1 Gender Issues, and it performed additional data collection and analysis as recommended in the self-audit and to satisfy their requirements for data-driven conclusions.

   The Subcommittee gathered additional evidence through interviews and questionnaires distributed to a sample of coaches, staff, student-athletes, and personnel outside of the IA department. The Subcommittee also conducted a comprehensive document analysis, including but not limited to the items reviewed during the self-audit. Lastly, the Subcommittee toured the athletic facilities located on the mountain and south campuses.

   The process described above was used to determine whether scholarship dollars are awarded to women and men at the same proportion as their respective rate of participation in the intercollegiate athletics program.

   (b) Provide data demonstrating the institution’s status and commitment across the program area.

   The following data demonstrates the University awarded scholarship dollars proportionate to the rate of athletic participation of women and men in 2009, and within approximately 1 percentage point of the proportionate rate of participation in 2008 and 2010. The underrepresented gender (female) is not
adversely impacted.

## NCAA Certification 2011 Self-Study

**Operating Principle 3.1 - Item**

Athletic Student Aid, by Team

The University of Montana

FY 2008 to FY 2010

### Fiscal Year 2007-08 (2008)

<table>
<thead>
<tr>
<th>Total</th>
<th>Athletic Aid ($)</th>
<th>FTE Awards (#)</th>
<th>Award Recipients (#)</th>
<th>Per FTE (#)</th>
<th>Per Recipient ($)</th>
</tr>
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<tbody>
<tr>
<td>Men's Basketball</td>
<td>280,672</td>
<td>12.71</td>
<td>13</td>
<td>22,083</td>
<td>21,590</td>
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<tr>
<td>Women's Basketball</td>
<td>229,129</td>
<td>14.41</td>
<td>15</td>
<td>15,901</td>
<td>15,275</td>
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<td>5.24</td>
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<td>Women's Tennis</td>
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<td>Men's Track/Cross Country</td>
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<td>12.36</td>
<td>33</td>
<td>16,196</td>
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<tr>
<td>Women's Track/Cross Country</td>
<td>271,867</td>
<td>17.54</td>
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<td>15,500</td>
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<tr>
<td>Football</td>
<td>1,168,944</td>
<td>61.99</td>
<td>81</td>
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<td>Golf</td>
<td>117,067</td>
<td>6.13</td>
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<tr>
<td>Soccer</td>
<td>232,526</td>
<td>13.33</td>
<td>23</td>
<td>17,444</td>
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<td>Volleyball</td>
<td>227,099</td>
<td>12.13</td>
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<td>All men's sports</td>
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<td>134</td>
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<td>All women's sports</td>
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<td>All sports, total</td>
<td>3,008,575</td>
<td>163.68</td>
<td>233</td>
<td>18,381</td>
<td>12,912</td>
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#### Participation

<table>
<thead>
<tr>
<th>Male Athletes</th>
<th>60%</th>
<th>Total Aid</th>
</tr>
</thead>
<tbody>
<tr>
<td>Female Athletes</td>
<td>40%</td>
<td>41%</td>
</tr>
</tbody>
</table>

### Fiscal Year 2008-09 (2009)

<table>
<thead>
<tr>
<th>Total</th>
<th>Athletic Aid ($)</th>
<th>FTE Awards (#)</th>
<th>Award Recipients (#)</th>
<th>Per FTE (#)</th>
<th>Per Recipient ($)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Men's Basketball</td>
<td>303,438</td>
<td>12.92</td>
<td>13</td>
<td>23,486</td>
<td>23,341</td>
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<tr>
<td>Women's Basketball</td>
<td>260,788</td>
<td>15.24</td>
<td>16</td>
<td>17,112</td>
<td>16,299</td>
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<tr>
<td>Sport</td>
<td>Men's Participation</td>
<td>Women's Participation</td>
<td>Men's Total</td>
<td>Women's Total</td>
<td></td>
</tr>
<tr>
<td>-----------------------</td>
<td>---------------------</td>
<td>-----------------------</td>
<td>-------------</td>
<td>---------------</td>
<td></td>
</tr>
<tr>
<td>Men's Tennis</td>
<td>157,486</td>
<td>148,944</td>
<td>34,997</td>
<td>19,071</td>
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<tr>
<td>Women's Tennis</td>
<td>171,020</td>
<td>270,450</td>
<td>14,667</td>
<td>15,384</td>
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<tr>
<td>Football</td>
<td>1,281,380</td>
<td>1,299,377</td>
<td>19,925</td>
<td>18,618</td>
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<tr>
<td>Golf</td>
<td>115,791</td>
<td>269,234</td>
<td>20,068</td>
<td>19,638</td>
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<tr>
<td>Soccer</td>
<td>234,170</td>
<td>247,579</td>
<td>18,900</td>
<td>8,537</td>
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</tr>
<tr>
<td>Volleyball</td>
<td>292,137</td>
<td>329,280</td>
<td>16,867</td>
<td>8,853</td>
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<tr>
<td>All men's sports</td>
<td>1,913,324</td>
<td>1,923,977</td>
<td>20,487</td>
<td>14,386</td>
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<tr>
<td>All women's sports</td>
<td>1,299,377</td>
<td>1,367,364</td>
<td>17,922</td>
<td>12,994</td>
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<tr>
<td>All sports, total</td>
<td>3,212,701</td>
<td>3,291,341</td>
<td>19,366</td>
<td>13,788</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Sport</th>
<th>Male Participation</th>
<th>Female Participation</th>
</tr>
</thead>
<tbody>
<tr>
<td>All men's sports</td>
<td>60%</td>
<td>40%</td>
</tr>
<tr>
<td>All women's sports</td>
<td>60%</td>
<td>40%</td>
</tr>
</tbody>
</table>

**Fiscal Year 2009-10 (2010)**

<table>
<thead>
<tr>
<th>Sport</th>
<th>Total Aid ($)</th>
<th>FTE Awards (#)</th>
<th>Award Recipients (#)</th>
<th>Average Award ($ Per FTE Recipient)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Men's Basketball</td>
<td>313,199</td>
<td>12.47</td>
<td>13</td>
<td>25,116</td>
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<tr>
<td>Women's Basketball</td>
<td>289,280</td>
<td>14.51</td>
<td>16</td>
<td>19,937</td>
</tr>
<tr>
<td>Men's Tennis</td>
<td>122,563</td>
<td>5.51</td>
<td>13</td>
<td>22,244</td>
</tr>
<tr>
<td>Women's Tennis</td>
<td>168,009</td>
<td>8.26</td>
<td>16</td>
<td>20,340</td>
</tr>
<tr>
<td>Men's Track/Cross Country</td>
<td>247,579</td>
<td>10.64</td>
<td>29</td>
<td>23,269</td>
</tr>
<tr>
<td>Women's Track/Cross Country</td>
<td>292,137</td>
<td>17.32</td>
<td>33</td>
<td>16,867</td>
</tr>
<tr>
<td>Football</td>
<td>1,222,317</td>
<td>61.69</td>
<td>81</td>
<td>19,814</td>
</tr>
<tr>
<td>Golf</td>
<td>130,924</td>
<td>5.58</td>
<td>8</td>
<td>23,463</td>
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<tr>
<td>Soccer</td>
<td>252,808</td>
<td>12.72</td>
<td>26</td>
<td>19,875</td>
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<tr>
<td>Volleyball</td>
<td>234,206</td>
<td>11.20</td>
<td>13</td>
<td>20,911</td>
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<tr>
<td>All men's sports</td>
<td>1,905,658</td>
<td>90.34</td>
<td>132</td>
<td>21,094</td>
</tr>
<tr>
<td>All women's sports</td>
<td>1,367,364</td>
<td>69.59</td>
<td>105</td>
<td>19,649</td>
</tr>
<tr>
<td>All sports, total</td>
<td>3,273,022</td>
<td>159.93</td>
<td>237</td>
<td>20,465</td>
</tr>
<tr>
<td></td>
<td>Participation</td>
<td>Total Aid</td>
<td></td>
<td></td>
</tr>
<tr>
<td>------------------</td>
<td>---------------</td>
<td>-----------</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Male Athletes</td>
<td>59%</td>
<td>58%</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Female Athletes</td>
<td>41%</td>
<td>42%</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

(c) Using the data provided in (b) above, analyze and explain how the institution is meeting the needs of the underrepresented gender in the athletics program (any differences should be clearly explained in the institution's narrative response, including any deficiencies the institution identifies in its analysis).

According to the EADA Financial Reports for 2008, 2009, and 2010 scholarship dollars are awarded to women at an insignificantly higher proportion than their respective rate of participation in the intercollegiate athletics program. The data also suggests a commitment by the IA department to continually monitor and manage student-athlete scholarships, a practice that is expected to continue as a priority for IA.

(d) Explain how the institution's written, stand-alone plan for gender issues addresses the program area, including any deficiencies identified in the institution's narrative response as listed in item (c) above.

The data indicate that the total amounts awarded are roughly proportional to participation by gender. The University will continue to assess scholarship allocations to assure that the amounts awarded to the male and female student-athletes collectively are proportionate to their respective rates of participation in the intercollegiate athletics program.

3. **Equipment and Supplies.** Quality; amount; suitability; maintenance and replacement; availability of equipment and supplies.

   (a) Describe how the institution has ensured a complete study of the program area. This study must be conducted as part of the self-study process.

The University of Montana (UM) Department of Intercollegiate Athletics (IA) has ensured a complete study of the program areas through a two-phase comprehensive review process, largely but not exclusively in preparation for the NCAA Cycle 3 Certification Self-Study.

Phase one of the review was initiated by the Senior Associate Athletic Director (SAAD) to explore adding a female sport (or two), and to determine whether the University was providing equal treatment to males and females in all intercollegiate athletic programs. For this, the SAAD requested a Title IX Compliance Self-Audit from the UM Equal Opportunity and Affirmative Action (EO/AA) Office. The EO/AA Director and a UM Legal Counsel paralegal commenced data collection in spring 2010 and concluded with a report issued in October 2010 (see Appendix ?, Report and Recommendations for Title IX Compliance). Evidence collected and analyzed included the following: relevant athletic department and institutional documents; a survey of the coaching staff, administrators, and two student athletes per sport (see Appendix ?, Sample Title IX Compliance Self-Audit Instruments); interviews with select personnel; and a facilities site visit.
The NCAA Cycle 3 Certification Operating Principle 3.1 Gender Issues Subcommittee (see Appendix ?, Plan for Conducting the NCAA Division I Athletics Certification Self-Study) conducted phase two of the self-study, beginning its review in early November 2010. The Subcommittee confirmed, or rejected, the Title IX Compliance Self-Audit findings as each related to the Operating Principle 3.1 Gender Issues, and it performed additional data collection and analysis as recommended in the self-study and to satisfy their requirements for data-driven conclusions.

The Subcommittee gathered additional evidence through interviews and questionnaires distributed to a sample of coaches, staff, student-athletes, and personnel outside of the IA department. The Subcommittee also conducted a comprehensive document analysis, including but not limited to the items reviewed during the self-audit. Lastly, the Subcommittee toured the athletic facilities located on the mountain and south campuses.

Equipment and supplies include uniforms, other apparel, sport-specific equipment and supplies, general equipment and supplies, instructional devices, coaches’ gear, and minor conditioning and weight training equipment. Whether the equipment and supplies provided to men’s and women’s teams is substantially equal was determined by surveying coaches and student-athletes and interviewing the Equipment Manager.

(b) Provide data demonstrating the institution's status and commitment across the program area.

Whether the quality and quantity of equipment and supplies provided to men’s and women’s programs is equitable was determined by surveying coaches and student-athletes and interviewing the Equipment Manager. Additionally, data from the 2008, 2009, and 2010 NCAA Financial Reports compared to athletic participation revealed the money spent on the women’s and men’s programs is proportionate with the exception of 2008. This discrepancy can be explained by some accounting errors carried out by a temporary employee who was unfamiliar with IA supplies and equipment. Apparently, items typically not allocated to a team (e.g., protein drink mix and golf carts) because they are used by all teams, was accounted for in the men’s program, specifically football. The 2009 and 2010 data reflect a more accurate picture of equipment and supplies expenses by gender.

### Three-Year Comparison of Equipment & Supplies and Participation by Gender

<table>
<thead>
<tr>
<th>Year</th>
<th>Men's</th>
<th>Women's</th>
<th>Men's</th>
<th>Women's</th>
<th>Men's</th>
<th>Women's</th>
</tr>
</thead>
<tbody>
<tr>
<td>2010</td>
<td>57%</td>
<td>43%</td>
<td>57%</td>
<td>43%</td>
<td>72%</td>
<td>29%</td>
</tr>
<tr>
<td>2009</td>
<td>59%</td>
<td>41%</td>
<td>60%</td>
<td>40%</td>
<td>60%</td>
<td>40%</td>
</tr>
<tr>
<td>2008</td>
<td>59%</td>
<td>41%</td>
<td>60%</td>
<td>40%</td>
<td>60%</td>
<td>40%</td>
</tr>
</tbody>
</table>

The Equipment Manager documented the following system used by IA staff for managing repair and replacement cycles for all team uniforms and apparel and the ordering procedures for Nike products.

Uniform and Apparel Replacement Procedures for all Sports From Rob Stack, Equipment Manager

1. All uniforms and warmups for competition are replaced on a three-year staggered cycle
   - Example: first year *Home* uniform, second year *Away* uniform, third year *Warm-up*. Then cycle is repeated.
2. All practice apparel is replaced on an as needed basis.
   - Example: if an item is torn or damaged, it is replaced
   - Example: items out of production are replaced at the discretion of head equipment manager or head coach of the related sport
   - Example: if an item is lost or stolen, the individual issued the item pays the cost of replacement

3. All competition and practice equipment is replaced on a needs basis
   - Example: if the manufacturer’s recommended life span is reached, the item is replaced
   - Example: if the equipment is broken or damaged, it is replaced

Athletic Equipment Room Nike Ordering procedure:

1. Contact head coach or appropriate assistant coach for ordering;
2. Review ordering process, contract, and terms;
3. Set-up timeline for the ordering process;
4. Set-up meeting with coaches and external representative;
5. Review products available and availability;
6. Set-up needs list;
7. Assure the need for products is appropriate within the sport;
8. Assure products are in compliance with NCAA rules and regulations;
9. Order appropriate apparel or equipment;
10. Review orders and check timelines and delivery dates;
11. Receive and inventory items; and
12. Issue items to appropriate sport.

Additionally, individual surveys revealed little dissatisfaction with the equipment -- some dissatisfaction with the equipment provided to the football team and a need for warmer gear for the cross-country and track & field student-athletes.
women’s teams. Additionally, the University is providing equivalent benefits to male and female athletes in the maintenance, replacement, and storage of equipment and supplies. Therefore, the University will continue to maintain equity and monitor equipment and supplies for men and women.

4. **Scheduling of Games and Practice Time.** Number of contests; number, length and time of day of practices; time of day of contests; preseason and postseason opportunities, including foreign tours.

(a) Describe how the institution has ensured a complete study of the program area. This study must be conducted as part of the self-study process.

The University of Montana (UM) Department of Intercollegiate Athletics (IA) has ensured a complete study of the program areas through a two-phase comprehensive review process, largely but not exclusively in preparation for the NCAA Cycle 3 Certification Self-Study.

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The Subcommittee gathered additional evidence through interviews and questionnaires distributed to a sample of coaches, staff, student-athletes, and personnel outside of the IA department. The Subcommittee also conducted a comprehensive document analysis, including but not limited to the items reviewed during the self-audit. Lastly, the Subcommittee toured the athletic facilities located on the mountain and south campuses.

Compliance with the scheduling of games and practice times was assessed by reviewing the equivalence of: the number of competitive events per sport, the number and length of practice opportunities, the time of day competitive events are scheduled, the time of day practice opportunities are scheduled, and the opportunities to engage in available pre-season and post-season competition. Coaches and student-athletes were surveyed. The Athletic Director and Senior Associate Athletic Director also provided pertinent information.
(b) Provide data demonstrating the institution's status and commitment across the program area.

<table>
<thead>
<tr>
<th>Athletic Program</th>
<th>Number of Events/Dates</th>
<th>NCAA Max.</th>
<th>% of Max.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Men’s Basketball</td>
<td>28</td>
<td>29</td>
<td>96</td>
</tr>
<tr>
<td>Men’s Football</td>
<td>11</td>
<td>11</td>
<td>100</td>
</tr>
<tr>
<td>Men’s Tennis</td>
<td>24</td>
<td>25</td>
<td>96</td>
</tr>
<tr>
<td>Men’s Cross Country</td>
<td>6</td>
<td>7</td>
<td>96</td>
</tr>
<tr>
<td>Men’s Track</td>
<td>18</td>
<td>18</td>
<td>100</td>
</tr>
<tr>
<td><strong>TOTAL</strong></td>
<td><strong>87</strong></td>
<td><strong>90</strong></td>
<td><strong>97%</strong></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Athletic Program</th>
<th>Number of Events/Dates</th>
<th>NCAA Max.</th>
<th>% of Max.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Women’s Basketball</td>
<td>29</td>
<td>29</td>
<td>100</td>
</tr>
<tr>
<td>Women’s Golf</td>
<td>19</td>
<td>24</td>
<td>79</td>
</tr>
<tr>
<td>Women’s Soccer</td>
<td>20</td>
<td>20</td>
<td>100</td>
</tr>
<tr>
<td>Women’s Tennis</td>
<td>24</td>
<td>25</td>
<td>96</td>
</tr>
<tr>
<td>Women’s Volleyball</td>
<td>24</td>
<td>28</td>
<td>86</td>
</tr>
<tr>
<td>Women’s Cross Country</td>
<td>6</td>
<td>7</td>
<td>96</td>
</tr>
<tr>
<td>Women’s Track</td>
<td>18</td>
<td>18</td>
<td>100</td>
</tr>
<tr>
<td><strong>TOTAL</strong></td>
<td><strong>140</strong></td>
<td><strong>151</strong></td>
<td><strong>93%</strong></td>
</tr>
</tbody>
</table>

The women’s basketball team played one more game than the men’s basketball team. The women’s basketball team played 100 percent of the number of games allowed by the NCAA compared to the men’s team which played only 96 percent of the allowable games. The men’s and women’s tennis and both cross country teams played 96 percent of the allowable events. Men’s and women’s indoor/outdoor track both competed in 100 percent of the allowable competitions. The football team played all of the allowable games. The women’s volleyball team competed in only 86 percent of the allowable games. Women’s soccer competed in 100 percent of the allowable games.

All of the men’s and women’s teams have regularly scheduled practices and the number and length of practices are comparable. Most teams practice from 1½ to 3 hours, five or six days a week; practice times vary.

Scheduling problems do occur, especially in the winter when the basketball, volleyball, track and field, tennis, and golf teams all try to schedule around the limited space and time slots available in the Adams Center for practice. Occasionally, there are student-athletes who miss meals or classes because of this. Teams in season are given priority practice times if there is a conflict. It was reported that the football team practice field is substandard. It was also reported that the women’s soccer practice field was difficult to practice on in the spring, because of the ice and the fact that it does not have lights to afford evening practice.

Men’s and Women’s teams get prime-time competition times in a comparable manner. There were no reports of problems or concerns with competition times and IA continues to schedule as appropriate for each team. The Athletic Director is responsible for scheduling the football games. For all other sports, however, the individual coaches are responsible for such scheduling.
Teams are allowed to compete in pre- and post-season competitions when eligible, but there is no written policy for such competition. Regarding pre-season opportunities, there was no finding of notable disparities for male versus female student-athletes. As for post-season competitions, if teams qualify they are provided the opportunity to participate.

(c) Using the data provided in (b) above, analyze and explain how the institution is meeting the needs of the underrepresented gender in the athletics program (any differences should be clearly explained in the institution's narrative response, including any deficiencies the institution identifies in its analysis).

The women’s teams competed in 4 percent fewer of the allowable events than did the men’s teams.

There is a reasonable explanation for the disparity in women’s volleyball. Within the NCAA rules, women’s volleyball competition is treated as dates of competition. That means that the team may participate in multiple matches on the same day, but within the rules, still have that count as only one date of competition. While it is true that the volleyball team participated in four fewer dates than the NCAA maximum, there were three instances in 2009 where the team competed in multiple matches on the same day. On August 29, September 4 and September 11, they competed in two matches on each of those days, resulting in six matches. Both the student-athlete and coach surveys for women’s volleyball indicated that they believed they had an adequate amount of competition opportunities.

Women’s golf reportedly competed in five fewer than the allowable number of events because the coach chose to compete in more nationally competitive tournaments. Travel to such events is more expensive than for regional tournaments, which are generally less competitive.

Overall, the University provides equal opportunity to male and female athletes in the number and length of practice opportunities. There were no reports of problems with competition times; they are appropriate for the teams. There were also no reports of problems with the season in which the sports were played. There is no finding that there are notable disparities in providing pre-season opportunities for male versus female student-athletes.

(d) Explain how the institution's written, stand-alone plan for gender issues addresses the program area, including any deficiencies identified in the institution's narrative response as listed in item (c ) above.

Overall, the University provides equal opportunity to male and female athletes in the number and length of practice opportunities. There were no reports of problems with competition times or with the season in which the sports were played. There is no finding that there are notable disparities in providing pre-season opportunities for male versus female student-athletes. The University will continue to maintain equity and monitor game scheduling and practice times for men and women.
5. Travel Allowance. Modes of transportation; housing furnished during travel; length of stay before and after competitive events; dining arrangements and per diem for institutional competition and other competitive opportunities.

(a) Describe how the institution has ensured a complete study of the program area. This study must be conducted as part of the self-study process.

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The Subcommittee gathered additional evidence through interviews and questionnaires distributed to a sample of coaches, staff, student-athletes, and personnel outside of the IA department. The Subcommittee also conducted a comprehensive document analysis, including but not limited to the items reviewed during the self-audit. Lastly, the Subcommittee toured the athletic facilities located on the mountain and south campuses.

The process described above was used to determine whether within the existing sports, the University is providing equal treatment to male and female student-athletes. This involves consideration of modes of transportation, housing furnished during travel, length of stay before and after competitive events, dining arrangements, and per diem for institutional competition and other competitive opportunities.

(b) Provide data demonstrating the institution's status and commitment across the program area.

In 2008, the University spent about $491,000 on travel expenses for men’s sports compared with approximately $479,000 for women’s sports. More money was spent for travel by the women’s basketball, tennis, and track and cross country than the comparable men’s teams. This trend shifts in 2009 and 2010.
When comparing travel expenses and athletic participation by gender, the NCAA Financial reports reveal the following:

| 3-Year Comparison of Travel Expenses and Participation from NCAA Financial Reports |
|---------------------------------|-----|-----|-----|-----|-----|-----|
|                                 | 2010 | 2009 | 2008 |
| % travel expense by gender      | 65%  | 35%  | 66%  | 34%  | 51%  | 49%  |
| % participants by gender        | 59%  | 41%  | 60%  | 40%  | 60%  | 40%  |

The average spent on travel for 2008, 2009, and 2010 compared to the average participation by gender is within 1 percentage point. This difference is primarily due to the 15 percent increase in travel costs by the men’s program from 2008 to 2009 (from 51 percent to 66 percent).

Coaches and students reported that the modes of transportation for their respective teams were generally adequate. However, it was also noted that long bus trips are hard on the student-athletes. Depending on the distance to the competitive event, teams travel by bus, rental car, or plane. One student-athlete in men’s tennis reported that there was not enough time for warm-up when traveling and sometimes there was not enough space when traveling. Based on the survey results, the University is providing equivalent modes of transportation to male and female student-athletes when traveling similar distances.

Survey results also indicate that both men’s and women’s teams are housed in medium to high quality hotels and student-athletes generally stay 2-3 per room.

All sports reported that their length of stay for competitive events is adequate. Most teams travel the day before the event and travel home immediately afterward. Track and field reported that it would be nice to travel the day before, but they often travel the day of the event to save money.

Per diem and meals provided before and after competitive events were reported as adequate and equivalent for both men’s and women’s teams.

(c) Using the data provided in (b) above, analyze and explain how the institution is meeting the needs of the underrepresented gender in the athletics program (any differences should be clearly explained in the institution's narrative response, including any deficiencies the institution identifies in its analysis).

The average spent on travel for 2008, 2009, and 2010 compared to the average participation by gender is within 1 percentage point. Albeit small when considered over a three-year span, there was a significant increase in travel expenditures for the men’s program from 2008 to 2009 (from 51 percent to 66 percent of the total). The 2007 football season (2008 fiscal year) did not result in a national championship and the travel expenses reflect this. However, in 2009 (2008 football season), more than $1 million was spent for all men’s sports compared to roughly half that
($567,000) for women’s sports, with the disparity due primarily to the football team traveling to James Madison University for a playoff game and subsequently making it to the national championship in Tennessee. The football program alone spent more than three times as much for travel as the year previous. In 2010 (2009 football season), men’s sports still accounted for 65 percent of the total, only 1 percentage point below fiscal year 2009 because the football program traveled again to the national championships. As a point of reference, for this current fiscal year (FY2011, football season 2010), with no trip to the national championship, football team travel is at $370,467 (and that will be the final number since the season is over). Comparing that to the 2007 season when the football team did not make it to the national championship reveals travel expenses on track. The roughly $100K difference between the 2007 and 2010 seasons can be attributed to increases in fuel prices and one more plane trip in 2010 than in 2007.

There is no disparity in housing, length of stay, dining, and per diem between men’s and women’s sports.

(d) Explain how the institution's written, stand-alone plan for gender issues addresses the program area, including any deficiencies identified in the institution's narrative response as listed in item (c) above.

Because no significant issues were identified, the University will continue to maintain equity by closely monitoring travel and per diem for the men’s and women’s programs.

6. Academic Support Services. Availability of, and equitable access to, academic support services that meet the needs of student-athletes based on individual student-athlete academic profiles and/or performance, and equitable criteria for obtaining assistance.

(a) Describe how the institution has ensured a complete study of the program area. This study must be conducted as part of the self-study process.

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The process described above was used to assess the availability of and equitable access to academic support services that meet the needs of student-athletes based on individual student-athlete academic profiles and/or performance, and equitable criteria for obtaining assistance.

(b) Provide data demonstrating the institution's status and commitment across the program area.

There are written policies governing tutoring of student-athletes located in the Student-Athlete Handbook and the Grizzly Academics Tutor Manual 2010-11. Special tutoring is available, upon request, to student-athletes separate from the overall student body. There is a centralized administration of academic advisors for men’s and women’s sports, with two advisors splitting the fourteen sports. No sport has its own advisors. Tutors are equally available to male and female athletes, tutoring times and days are comparable for male and female athletes, and tutors are available for all subjects. Tutors are students or graduate students that have successfully completed the course or courses they tutor (A or B in completed course; approximately ten tutors per academic year). Rates of pay are the same for all subjects and are paid for by the Department of Intercollegiate Athletics ($7.50-$9.00/hr). Most tutoring is one-on-one or in small groups. Study tables are also available.

Surveys of both coaches and student-athletes indicate that tutoring services are viewed generally as available and adequate. One student in football, though, was not aware of the availability of tutoring, and some coaches and student-athletes indicated that tutoring is sometimes limited or unavailable for certain classes. Female student-athletes apparently were more likely to avail themselves of such assistance during Fall 2009 and Spring and Summer 2010 -- while they represent about 40 percent of the athletics participants, they used about 64 percent of the 457 tutoring hours generated during that period.

<table>
<thead>
<tr>
<th>Sport</th>
<th>Tutoring Hours</th>
</tr>
</thead>
<tbody>
<tr>
<td>Women’s Soccer</td>
<td>135.5</td>
</tr>
<tr>
<td>Men’s Football</td>
<td>88</td>
</tr>
<tr>
<td>Women’s Track and Field &amp; Cross Country</td>
<td>77</td>
</tr>
<tr>
<td>Men’s Track and Field &amp; Cross Country</td>
<td>30</td>
</tr>
<tr>
<td>Men’s Basketball</td>
<td>39.5</td>
</tr>
</tbody>
</table>

Athletic Academic Services
Tutoring hours by sport
2009-10 year (fall, spring, summer)
(c) Using the data provided in (b) above, analyze and explain how the institution is meeting the needs of the underrepresented gender in the athletics program (any differences should be clearly explained in the institution's narrative response, including any deficiencies the institution identifies in its analysis).

<table>
<thead>
<tr>
<th>Women's Basketball</th>
<th>34.5</th>
</tr>
</thead>
<tbody>
<tr>
<td>Women's Tennis</td>
<td>30</td>
</tr>
<tr>
<td>Men's Tennis</td>
<td>8.5</td>
</tr>
<tr>
<td>Women's Volleyball</td>
<td>11</td>
</tr>
<tr>
<td>Women’s Golf</td>
<td>3</td>
</tr>
<tr>
<td><strong>TOTAL</strong></td>
<td><strong>291</strong></td>
</tr>
</tbody>
</table>

The benefits and limitations of the academic support services in intercollegiate athletics are applied equally in both the men’s and women’s programs.

(d) Explain how the institution's written, stand-alone plan for gender issues addresses the program area, including any deficiencies identified in the institution's narrative response as listed in item (c) above.

There were no issues with the quality or availability of academic support services for both the men’s and women’s programs. The University will continue to maintain equity and monitor tutoring for men and women.

7. Coaches. Availability of full-time, part-time, assistant and graduate assistants. Training, experience, professional standing, and other professional qualifications. Total rate of compensation package, duration of contracts, conditions relating to contract renewal, experience, nature of coaching duties, working conditions and other terms and conditions of employment.

(a) Describe how the institution has ensured a complete study of the program area. This study must be conducted as part of the self-study process.

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This program area was assessed to determine the equivalence of availability of full, part-time, and graduate assistants, the quality and nature of the coaching, and the compensation of coaches. In terms of assignment, assessment is made of the training, experience, other professional qualifications and professional standing of the coaching staffs in male and female programs. As to equivalence of compensation, compliance depends on the rate of compensation (per sport, per session), duration of contracts, conditions relating to contract renewal, experience, nature of coaching duties performed, working conditions, and other terms and conditions of employment. It is relevant to consider specific non-discriminatory reasons that explain away pay differences including the range and nature of the duties, experience of coaches, the number of participants in the sport, the number of assistant coaches supervised, skill, effort, responsibilities and working conditions, and an outstanding record of achievement.

(b) Provide data demonstrating the institution's status and commitment across the program area.

Compliance in the Coaches program area was determined by assessing the equivalence of availability of full, part-time, and graduate assistants, the quality and nature of the coaching, and the compensation of coaches. In terms of assignment, assessment is made of the training, experience, other professional qualifications and professional standing of the coaching staff in male and female programs. As to equivalence of compensation, compliance depends on the rate of compensation (per sport, per session), duration of contracts, conditions relating to contract renewal, experience, nature of coaching duties performed, working conditions, and other terms and conditions of employment. It is relevant to consider specific non-discriminatory reasons that explain pay differences including the range and nature of the duties, experience of coaches, the number of participants in the sport, the number of assistant coaches supervised, skill, effort, responsibilities and working conditions, and an outstanding record of achievement.

**Availability of Coaches**

<table>
<thead>
<tr>
<th>Athletic Program</th>
<th>Number of Athletes</th>
<th>Head Coaches</th>
<th>Assistant Coaches</th>
<th>FTE Ratio</th>
</tr>
</thead>
<tbody>
<tr>
<td>Data from the 2009 NCAA and EADA Reports</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Men’s Basketball  14  1  3  3.5  
Football  119  1  10  10.8  
Men’s Tennis  11  1  0  11  
TOTAL  144  3  13  9  

Women’s Basketball  16  1  3  4  
Women’s Golf  8  1  0  8  
Women’s Soccer  29  1  2  9.67  
Women’s Tennis  9  1  0  9  
Women’s Volleyball  14  1  2  4.67  
TOTAL  76  5  7  6.33  

Note: the analysis of the availability of coaches does not include combined teams, because the coaches for cross-country and track reported their time was spent evenly between men and women.

With 144 male student-athletes on the non-combined teams and 16 coaches available, the ratio of head and assistant coaches to student athletes is 1:9. For females, the total student-athletes on non-combined teams is 76 and the number of coaches is 12; a ratio of coaches to student-athletes of 1:6. Despite the statistical difference, surveys of coaches and student-athletes indicate that the overall ratio of coaches available to male and female student-athletes does not adversely affect the underrepresented sex in any particular sport.

Assignment of Coaches

The head coaches for the men’s teams have an average of 22 years of coaching experience, while the head coaches for the women’s teams have an average of 21 years of experience. The assistant coaches for the men’s teams reported, collectively, about 70 years of experience compared to 12 years for the women’s team assistant coaches. The disparity for head coaches is insignificant. However the assistant coaches for men’s teams have, collectively, considerably more years of experience.

Although this difference is significant, it is perhaps not unexpected and can be explained. In women’s basketball, for example, the assistant coaches have, collectively, about 6 more years of experience than the men’s team. On the other hand, the men’s tennis coach began at UM with no experience and has been coaching for 28 years, while the women’s tennis coach was hired two years ago with 10 years of experience.

Surveys of student-athletes did not reveal any concerns or evidence of unequal coaching provided female and male student-athletes. There is currently no cause for concern in this area.

Compensation

This analysis considers the allocation of funds for coaching the men’s and women’s programs as reported in the 2008-2010 NCAA Financial Reports (ID 19 and 20), which includes all coaching staff and their respective gross salaries, bonuses and benefits, and any compensation paid to the coaching staff by a third party contractually guaranteed by the institution. The compensation for the cross country and track programs are not included in this analysis, because the same coaching staff is used for the men’s and women’s programs in these sports.


### Table: Salary Expense and Participants by Gender

<table>
<thead>
<tr>
<th></th>
<th>2010</th>
<th>2009</th>
<th>2008</th>
</tr>
</thead>
<tbody>
<tr>
<td>% salary expense by gender</td>
<td>Men's</td>
<td>Women's</td>
<td>Men's</td>
</tr>
<tr>
<td></td>
<td>63%</td>
<td>37%</td>
<td>59%</td>
</tr>
<tr>
<td>% participants by gender</td>
<td>59%</td>
<td>41%</td>
<td>60%</td>
</tr>
</tbody>
</table>

On average, the total funds for the last three years paid to the men’s program for coaching is $1,512,163, or 62 percent of the total. The total funds paid to the women’s program for coaching is $944,174 or 38 percent. The average participation rates of men and women in the athletic program are 60 percent and 40 percent respectively. When analyzed with respect to the participation rate in female athletics, there is only a 2 percentage point difference between the average coaching budget allocated to the women’s program (38 percent) and the average rate of participation in the women’s athletic program based on 2008, 2009, and 2010 NCAA Financial data (40 percent).

The duration of contracts and conditions relating to contract renewal for coaches varies by sport yet appears consistent among the men’s and women’s programs. The Head Coaches for men’s and women’s basketball and football (“Revenue Sports”) have 3-year contracts, all other coaching staff are on letters of appointment or one-year (non multi-year) contracts. The head coaches for soccer, volleyball, track/cross-country, women’s and men’s tennis, and women’s golf are also on letters of appointment or one-year contracts. A 3-year contract is renewable at the end of the term; whereas, a letter of appointment is contingent upon funding.

(c) Using the data provided in (b) above, analyze and explain how the institution is meeting the needs of the underrepresented gender in the athletics program (any differences should be clearly explained in the institution's narrative response, including any deficiencies the institution identifies in its analysis).

There are no significant disparities that would adversely affect the underrepresented sex in any particular sport. The University is providing equivalent opportunities with respect to the assignment of coaches and opportunities to receive coaching. Compensation for coaches is within approximately $50,000 (2 percent of the overall $2,456,337). This is a significant improvement from the results of the 1993 audit when the difference was 11 percentage points. And, with the addition of women’s softball beginning in 2012-13 and the hiring of head and assistant coaches - a cost of approximately $147,200 (with benefits) - this inequity should be corrected.

The duration of contracts and conditions relating to contract renewal for coaches varies by sport, yet appears consistent between the men’s and women’s programs.

(d) Explain how the institution's written, stand-alone plan for gender issues addresses the program area, including any deficiencies identified in the institution's narrative response as listed in item (c) above.

Although no significant issues were identified in the Coaches program area, the University will maintain the following measurable goals:

1. make every attempt to hire qualified female coaches as vacancies occur;
2. annually review Big Sky Conference personnel survey to ensure salaries are competitive;
3. continue to maintain equity and monitor coaches’ contracts, professional development,
working conditions, etc. for men and women; and
4. implement a new sport in 2012-13 with the hiring of head and assistant coaches; an additional expense of approximately $147,200 (with benefits).

8. Locker Rooms, Practice and Competitive Facilities. Quality, availability and exclusivity of practice and competitive facilities; quality and availability of locker rooms; maintenance and preparation of practice and competitive facilities.

(a) Describe how the institution has ensured a complete study of the program area. This study must be conducted as part of the self-study process.

The University of Montana (UM) Department of Intercollegiate Athletics (IA) has ensured a complete study of the program areas through a two-phase comprehensive review process, largely but not exclusively in preparation for the NCAA Cycle 3 Certification Self-Study.

Phase one of the review was initiated by the Senior Associate Athletic Director (SAAD) to explore adding a female sport (or two), and to determine whether the University was providing equal treatment to males and females in all intercollegiate athletic programs. For this, the SAAD requested a Title IX Compliance Self-Audit from the UM Equal Opportunity and Affirmative Action (EO/AA) Office. The EO/AA Director and a UM Legal Counsel paralegal commenced data collection in spring 2010 and concluded with a report issued in October 2010 (see Appendix ?, Report and Recommendations for Title IX Compliance). Evidence collected and analyzed included the following: relevant athletic department and institutional documents; a survey of the coaching staff, administrators, and two student athletes per sport (see Appendix ?, Sample Title IX Compliance Self-Audit Instruments); interviews with select personnel; and a facilities site visit.

The NCAA Cycle 3 Certification Operating Principle 3.1 Gender Issues Subcommittee (see Appendix ?, Plan for Conducting the NCAA Division I Athletics Certification Self-Study) conducted phase two of the self-study, beginning its review in early November 2010. The Subcommittee confirmed, or rejected, the Title IX Compliance Self-Audit findings as each related to the Operating Principle 3.1 Gender Issues, and it performed additional data collection and analysis as recommended in the self-audit and to satisfy their requirements for data-driven conclusions.

The Subcommittee gathered additional evidence through interviews and questionnaires distributed to a sample of coaches, staff, student-athletes, and personnel outside of the IA department. The Subcommittee also conducted a comprehensive document analysis, including but not limited to the items reviewed during the self-audit. Lastly, the Subcommittee toured the athletic facilities located on the mountain and south campuses.

Compliance with this section was assessed by looking at the equivalence of: quality, availability of facilities provided for practice and competitive events, exclusivity of use of facilities provided for practices and competitive events, availability of locker rooms, quality of locker rooms, maintenance of practice and competitive facilities, and preparation of facilities using the process described above.
(b) Provide data demonstrating the institution's status and commitment across the program area.

**Practice Facilities**

Indoor sports: Men’s and women’s basketball practice in the West Auxiliary Gym of the Adam’s Center. They share with volleyball, track, and golf. The basketball teams practice in their competition space which is the Dahlberg Arena. Both coaches and student-athletes from men’s and women’s basketball and volleyball report that the practice facility is adequate to excellent. There are scheduling conflicts which affect both men’s and women’s teams. Practice space is scheduled centrally through the Adams Center. Teams in their season receive priority for practice space. Teams playing at home receive priority to schedule the Dahlberg Arena. Teams playing on the road use the West Auxiliary Gym or practice around the home team in the Dahlberg Arena.

Outdoor sports: The football team practices at the Riverbowl North field. Coaches and student-athletes report that this facility is substandard. The community accesses the field; it is too small and in poor condition. Men’s and women’s tennis share the outdoor courts for practice. The courts are reportedly adequate or excellent. Recently, indoor tennis facilities have been made available at the Peak; a fitness center with indoor tennis courts. Women’s golf reports that the outdoor golf courses are adequate, but the indoor practice is inadequate. Women’s soccer practices on the South Campus Stadium. Indoor practice occurs in the Adam’s Center West Auxiliary Gym. The student-athletes surveyed stated that the practice facility is excellent. A coach noted that the practice facility is the same as the competition facility which causes damage to the field quality. A student-athlete noted that there are no lights on the field so it is not possible to practice early or late. Men’s and women’s track and field practice on the Dornblaser Field, which is an adequate practice facility. The indoor practice facility is inadequate; however, it is too small and shared with other teams so there is not enough practice time. The lack of an adequate indoor practice facility also impacts the cross country team.

**Competition Facilities**

Competition facilities for all sports were reported as adequate to excellent. However, competition is limited for track and field, because of the lack of indoor competition facilities. There is a need to resurface the tennis and add an electrical outlet. This affects male and female student-athletes equally.

**Locker Rooms**

Each athlete is assigned one locker for the year. There is some concern that the men’s basketball locker room is inadequate; it is too small, the showers are not good in good condition, and it is not reserved for exclusive use of the team. Women’s basketball noted that their locker room was adequate, although the ventilation is poor. There is concern that the locker room for the football team is substandard: it is too small and the showers are insufficient. In soccer, the locker room was reported as adequate, but there was some concern that the single shower is not adequate. Also, when soccer is practicing indoors at the Adam’s Center, the number of lockers assigned to student-athletes is inadequate. Both men’s and women’s tennis reported substandard locker rooms. They are not close to the practice facility. Women’s volleyball reported their locker rooms are excellent. Cross country and track and field noted that the locker rooms are substandard.
(c) Using the data provided in (b) above, analyze and explain how the institution is meeting the needs of the underrepresented gender in the athletics program (any differences should be clearly explained in the institution's narrative response, including any deficiencies the institution identifies in its analysis).

| The concerns about the practice and competitive facilities were the same or similar for men’s and women’s sports. There is not a notable disparity in terms of locker rooms provided to men’s and women’s teams. The concerns expressed by the coaches and student-athletes indicate that the male and female student-athletes are equivalently affected by any deficiencies in the quality, availability, exclusive use, and maintenance and preparation of their practice and competitive facilities. Similarly, the availability, quality, and exclusivity of locker rooms affect male and female athletes equivalently. |

(d) Explain how the institution's written, stand-alone plan for gender issues addresses the program area, including any deficiencies identified in the institution's narrative response as listed in item (c) above.

| Because no major issues were discovered in the quality, availability and exclusivity of practice and competitive facilities; quality and availability of locker rooms, or maintenance and preparation of practice and competitive facilities, the University will continue to maintain equity and monitor locker rooms, practice, and competitive facilities. |

9. Medical and Training Facilities and Services. Availability of medical personnel; availability and quality of weight training and conditioning facilities; availability and qualifications of athletic trainers; health, accident and injury insurance coverage; provision of medical and training expenses. [Note: The institution may want to refer to the equitable medical care section of the NCAA Sports Medicine Handbook as a guide in responding to Item No. 9 of the program area checklist.]

(a) Describe how the institution has ensured a complete study of the program area. This study must be conducted as part of the self-study process.

| The University of Montana (UM) Department of Intercollegiate Athletics (IA) has ensured a complete study of the program areas through a two-phase comprehensive review process, largely but not exclusively in preparation for the NCAA Cycle 3 Certification Self-Study. Phase one of the review was initiated by the Senior Associate Athletic Director (SAAD) to explore adding a female sport (or two), and to determine whether the University was providing equal treatment to males and females in all intercollegiate athletic programs. For this, the SAAD requested a Title IX Compliance Self-Audit from the UM Equal Opportunity and Affirmative Action (EO/AA) Office, The EO/AA Director and a UM Legal Counsel paralegal commenced data collection in spring 2010 and concluded with a report issued in October 2010 (see Appendix ?, Report and Recommendations for Title IX Compliance). Evidence collected and analyzed included the following: relevant athletic department and institutional documents; a survey of the coaching staff, administrators, and two student athletes per sport (see Appendix ?, Sample Title IX Compliance Self-Audit Instruments); interviews with select personnel; and a facilities site visit. |

The NCAA Cycle 3 Certification Operating Principle 3.1 Gender Issues Subcommittee (see
Appendix ?, Plan for Conducting the NCAA Division I Athletics Certification Self-Study) conducted phase two of the self-study, beginning its review in early November 2010. The Subcommittee confirmed, or rejected, the Title IX Compliance Self-Audit findings as each related to the Operating Principle 3.1 Gender Issues, and it performed additional data collection and analysis as recommended in the self-audit and to satisfy their requirements for data-driven conclusions.

The Subcommittee gathered additional evidence through interviews and questionnaires distributed to a sample of coaches, staff, student-athletes, and personnel outside of the IA department. The Subcommittee also conducted a comprehensive document analysis, including but not limited to the items reviewed during the self-audit. Lastly, the Subcommittee toured the athletic facilities located on the mountain and south campuses.

Compliance with this factor was assessed by reviewing the equivalence of availability of medical personnel and assistance, insurance, availability and quality of weight and training facilities, availability and quality of conditioning facilities, and availability and qualifications of athletic trainers utilizing the process described above.

(b) Provide data demonstrating the institution's status and commitment across the program area.

The University has written policies and procedures governing the delivery of health care to student-athletes. The UM Rhinehart Athletic Training Center (RATC) is primarily responsible for the delivery of health care to student-athletes. The medical program for student-athletes is under the direct supervision of team physicians. The director responsible for management of the program is the director of the Curry Health Center. Team physicians are assisted by the Licensed Certified Athletic Trainers (ATCs) and their student staff. Physicians are available at home games for soccer, football, men’s and women’s basketball, and volleyball. A physician travels with the football team. Athletic trainers attend practices for football, men’s and women’s basketball, soccer, and volleyball, track and field. Athletic trainers attend home games for football, men’s and women’s basketball, soccer, volleyball, men’s and women’s tennis, and men’s and women’s track and field and cross-country. The only sport not listed for home coverage is golf as they do not have home events.

Athletic trainers travel with volleyball, soccer, men’s and women’s basketball, track and field, and football. All student-athletes receive annual physicals through the Curry Health Center. The University’s written policy states that the Athletic Department utilizes the student-athlete’s family insurance company as the primary source for handling medical claims. The Department of Intercollegiate Athletics carries insurance which provides secondary coverage for hospital, medical, or surgical care for injuries received in competition, practice, or travel to or from athletic activities. This coverage is available to all student-athletes (see Appendix ?, title).

The RATC is open Monday through Friday when school is in session from 7am-11:30am and 1pm-6pm for general use by all student-athletes. Student-athletes and coaches reported that the Rhinehart Athletic Training Center and it staff meets their needs. Overall, coaches and student-athletes feel the quality and availability of the athletic trainers are adequate.

The staff listed below are supervised internally by the Head Athletic Trainer as well as by the Senior Associate Athletic Director (SAAD) and the team physician.

Medical personnel experience, salaries, and assignments by sport and gender
All certified athletic trainers work with all sports during coverage of the open Rhinehart Athletic Training Room daily hours. Sports assignments are given for travel, game and practice coverage.

- Head Certified Athletic Trainer (male): 28 years at UM, 30 overall as ATC. Current salary is low-to-average compared to other head ATCs in the Big Sky Conference (BSC). Currently holds many administrative duties as well as men’s basketball (14 athletes); assists with football
- Associate Certified Athletic Trainer (male): 15 years at UM, 19 years overall as ATC. Current salary average to other Assistant ATC’s in the BSC. No other schools have Associate ATC. Currently few administrative duties as well as football, men’s and women’s tennis, women’s golf – 112 male /15 female athletes
- Assistant Certified Athletic Trainer (female): 6 years at UM, 25 years overall as ATC. Current salary is low in comparison to other Assistant ATC’s in the BSC. Current women’s volleyball 13 female athletes, women’s basketball 28 female athletes
- Assistant Certified Athletic Trainer (male): 4 years at UM, 9 years overall as ATC. Currently salary is low in comparison to other Assistant ATC’s in the BSC. Currently assigned to women’s soccer 31 female athletes, cheer 16 Female and 8 male athletes and dance 15 female. The committee understands that Cheer and Dance are not considered a countable sport, but goes to show job/time availability of this ATC.
- Assistant Certified Athletic Trainer (male): 2 years at UM as full time ATC was Graduate Assistant previous 2 years. Currently Salary is low in comparison to other Assistant ATC’s in the BSC. Currently assigned to men’s and women’s cross country, men’s and women’s track – 47 male/42 female
- Graduate Assistant certified athletic trainer (female in 2010/11): women’s volleyball (13 female athletes), other duties as assigned.

Weight and training facilities

There is a single strength and conditioning facility (weight room) which is used by all student-athletes. There is a general consensus that the weight room is not adequate. Each team has a designated time when it is available for their exclusive use. This time is determined by the sport coach and the strength coach with consideration for time and space needs. However, any student-athlete as an individual may use the facility during open hours with the approval of weight room staff. There is no indication that the weight room is not equally available at convenient times for female student-athletes.

(c) Using the data provided in (b) above, analyze and explain how the institution is meeting the needs of the underrepresented gender in the athletics program (any differences should be clearly explained in the institution's narrative response, including any deficiencies the institution identifies in its analysis).

The University is providing male and female student-athletes equivalent benefits in the availability of medical personnel and assistance, insurance, availability and quality of weight and training facilities, availability and quality of conditioning facilities, and availability and qualifications of athletic trainers.
(d) Explain how the institution's written, stand-alone plan for gender issues addresses the program area, including any deficiencies identified in the institution's narrative response as listed in item (c ) above.

The University will continue to maintain equity and monitor medical and training facilities and services.

10. Housing and Dining Facilities and Services. Housing provided; special services as part of housing; dining arrangements.

(a) Describe how the institution has ensured a complete study of the program area. This study must be conducted as part of the self-study process.

The University of Montana (UM) Department of Intercollegiate Athletics (IA) has ensured a complete study of the program areas through a two-phase comprehensive review process, largely but not exclusively in preparation for the NCAA Cycle 3 Certification Self-Study.

Phase one of the review was initiated by the Senior Associate Athletic Director (SAAD) to explore adding a female sport (or two), and to determine whether the University was providing equal treatment to males and females in all intercollegiate athletic programs. For this, the SAAD requested a Title IX Compliance Self-Audit from the UM Equal Opportunity and Affirmative Action (EO/AA) Office. The EO/AA Director and a UM Legal Counsel paralegal commenced data collection in spring 2010 and concluded with a report issued in October 2010 (see Appendix ?, Report and Recommendations for Title IX Compliance). Evidence collected and analyzed included the following: relevant athletic department and institutional documents; a survey of the coaching staff, administrators, and two student athletes per sport (see Appendix ?, Sample Title IX Compliance Self-Audit Instruments); interviews with select personnel; and a facilities site visit.

The NCAA Cycle 3 Certification Operating Principle 3.1 Gender Issues Subcommittee (see Appendix ?, Plan for Conducting the NCAA Division I Athletics Certification Self-Study) conducted phase two of the self-study, beginning its review in early November 2010. The Subcommittee confirmed, or rejected, the Title IX Compliance Self-Audit findings as each related to the Operating Principle 3.1 Gender Issues, and it performed additional data collection and analysis as recommended in the self-audit and to satisfy their requirements for data-driven conclusions.

The Subcommittee gathered additional evidence through interviews and questionnaires distributed to a sample of coaches, staff, student-athletes, and personnel outside of the IA department. The Subcommittee also conducted a comprehensive document analysis, including but not limited to the items reviewed during the self-audit. Lastly, the Subcommittee toured the athletic facilities located on the mountain and south campuses.

Utilizing the process described above, compliance was determined in this program area by assessing the equivalence of housing, special services as a part of housing arrangement (laundry, parking, kitchen facilities, number of athletes to a room, size of rooms, showers and restrooms), and dining services.
(b) Provide data demonstrating the institution's status and commitment across the program area.

Student-athletes are provided housing opportunities equal to those of the general student body. The University also offers student-athletes the same meal plans as those offered to the general student body. Student-athletes who take part in fall practices are provided meals until the beginning of fall semester. The University does not provide special dining facilities or services to female or male athletes during the academic year. There is no written policy regarding pre- and post-game meals. Each coach decides what is in the best interests of the particular team. Teams which practice or train during school breaks, or before school begins, receive meals during those times. Women’s soccer has not done pre-game meals in the past, but this year is planning to have UM Dining Services cater pre-game meals in the Canyon Club. Women’s volleyball provides such pre-game meals for home matches. These are also catered and take place in the Sky Club. Women’s basketball eats pre-game meals at local restaurants. Men’s basketball has simple pre-game meals catered by UM Dining Services to the Sky Club. Teams such as golf and track and field which rarely if ever have home events do not provide pre-game meals. Occasionally women’s golf has team training meals (1-2 per semester) and track and field will have a buffet style pre-game meal. Volleyball has three weeks of training table meals. Women’s and men’s basketball provide sandwiches or pizza in the locker room after home games.

(c) Using the data provided in (b) above, analyze and explain how the institution is meeting the needs of the underrepresented gender in the athletics program (any differences should be clearly explained in the institution's narrative response, including any deficiencies the institution identifies in its analysis).

There is no disparity in the equivalence of housing, special services, and dining services provided to student-athletes in male and female sports.

(d) Explain how the institution's written, stand-alone plan for gender issues addresses the program area, including any deficiencies identified in the institution's narrative response as listed in item (c) above.

The University will continue to maintain equity and monitor housing and dining services.

11. Publicity and Awards. Availability and quality of sports information personnel; access to other publicity resources; quantity and quality of publications and other promotional devices; availability and quality of institutional awards; opportunity for application and/or nomination for other outside awards (e.g., NCAA, national or conference awards).

(a) Describe how the institution has ensured a complete study of the program area. This study must be conducted as part of the self-study process.

The University of Montana (UM) Department of Intercollegiate Athletics (IA) has ensured a complete study of the program areas through a two-phase comprehensive review process, largely...
but not exclusively in preparation for the NCAA Cycle 3 Certification Self-Study.

Phase one of the review was initiated by the Senior Associate Athletic Director (SAAD) to explore adding a female sport (or two), and to determine whether the University was providing equal treatment to males and females in all intercollegiate athletic programs. For this, the SAAD requested a Title IX Compliance Self-Audit from the UM Equal Opportunity and Affirmative Action (EO/AA) Office. The EO/AA Director and a UM Legal Counsel paralegal commenced data collection in spring 2010 and concluded with a report issued in October 2010 (see Appendix ?, Report and Recommendations for Title IX Compliance). Evidence collected and analyzed included the following: relevant athletic department and institutional documents; a survey of the coaching staff, administrators, and two student athletes per sport (see Appendix ?, Sample Title IX Compliance Self-Audit Instruments); interviews with select personnel; and a facilities site visit.

The NCAA Cycle 3 Certification Operating Principle 3.1 Gender Issues Subcommittee (see Appendix ?, Plan for Conducting the NCAA Division I Athletics Certification Self-Study) conducted phase two of the self-study, beginning its review in early November 2010. The Subcommittee confirmed, or rejected, the Title IX Compliance Self-Audit findings as each related to the Operating Principle 3.1 Gender Issues, and it performed additional data collection and analysis as recommended in the self-audit and to satisfy their requirements for data-driven conclusions.

The Subcommittee gathered additional evidence through interviews and questionnaires distributed to a sample of coaches, staff, student-athletes, and personnel outside of the IA department. The Subcommittee also conducted a comprehensive document analysis, including but not limited to the items reviewed during the self-audit. Lastly, the Subcommittee toured the athletic facilities located on the mountain and south campuses.

To determine compliance in this program area, the process described above was used to assess the equivalence of availability and quality of sports information personnel, access to other publicity resources, and quantity and quality of publications and other promotional devices, including the quality and opportunity for institutional and outside awards.

(b) Provide data demonstrating the institution's status and commitment across the program area.

The Sports Information Director (SID) has held that position for 31 years. He writes press releases for state and national media, the website and produced publications. He compiles and oversees statistics at home games for football and men’s basketball. He manages public relations for the athletic department. He reports to the Athletic Director. He reportedly spends approximately 60 percent of his time on football, 30 percent on men’s basketball, and 10 percent on other sports. The SID and the Assistant Athletic Director coordinate all radio and TV coverage. He and the Assistant SID, arrange press conferences for fall and winter sports for free TV and radio news coverage. The SID travels to away games and is present for home games. The Assistant Sports Information Director (ASID) has held that position for approximately seven years and has a total of 11 years experience in the sports information profession. He reports to the SID. He gives full attention to sports that are in season. He coordinates publicity for soccer, volleyball, cross-country, women’s basketball, and track and field. He oversees two interns who cover men’s and women’s tennis and golf. The ASID travels to select away games, mainly postseason tournaments, and attends all home games. Publicity is more difficult for sports which do not compete at home such as men’s and women’s tennis, golf, track and field, and cross country. However, the relative lack of publicity is equivalent for men’s and women’s sports which have few or no home matches.
Radio, television, and live video streaming coverage are provided for men’s and women’s basketball and football. All Big Sky Conference games are televised. Coaches of both basketball teams and of the football team have a regular radio program and highlights are provided in a regular roundup for both teams. Media archives including video highlights are provided on the Department of Intercollegiate Athletics (IA) web page for soccer and volleyball. Media highlights are archived on the web for all sports. Students from track and field, men’s tennis, and golf report that there is not adequate publicity. However, this affects men and women equally in these sports in which there are minimal, if any, home competitions.

In 1993, the Office of Civil Rights (OCR) found that the University was not providing equal benefits and opportunities to female athletes in the publications provided to women’s teams. It found that the men’s basketball and football teams were provided extensive press guides on high quality paper, game programs, posters, pocket schedules, and post-season media guides. The women’s basketball guide had 20 fewer pages and the paper was of lower quality than the men’s basketball and football guides. The women’s volleyball guide was smaller and had 24 fewer pages than the men’s guides. There were no volleyball match programs and their poster was smaller than that of other teams. This deficiency has been eliminated. Equivalent schedules, rosters, statistics, and promotional yearbooks are provided for football, men’s and women’s basketball, volleyball, and soccer. Equivalent yearbooks or media guides, rosters, statistics, and schedules are provided for men’s and women’s tennis and golf. Track and field and cross country also provide equivalent schedules, rosters, and statistics for men and women. This information can all be accessed on the Athletics website. Hard copies of programs and schedules are also available.

Institutional and outside awards are available to all student-athletes, they include the following:
- Department of Intercollegiate Athletics: letter jackets, watches, etc. (see Student-Athlete Handbook);
- recognition for academic achievement during Lindsay Honors Banquet (see Lindsay Honors Banquet program); and
- NCAA and Big Sky Conference recognition and awards by sport.

(c) Using the data provided in (b) above, analyze and explain how the institution is meeting the needs of the underrepresented gender in the athletics program (any differences should be clearly explained in the institution's narrative response, including any deficiencies the institution identifies in its analysis).

The University is meeting the needs of the women’s program equal to that of the men’s program in the availability of sports information personnel and access to publicity resources. Although the Senior Information Director (SID) is disproportionately assigned to the men’s program than to the women’s program (60 percent football and 30 percent men’s basketball) the quantity and quality produced by the Assistant Sports Information Director (ASID) for the women’s program are, at a minimum, equal to the work produced by the SID. The University is also producing equal quantity and quality of publications and other promotional devices for the women’s and men’s programs. Lastly, the availability and quality of institutional awards is equal for both the men’s and women’s programs.
(d) Explain how the institution's written, stand-alone plan for gender issues addresses the program area, including any deficiencies identified in the institution's narrative response as listed in item (c) above.

The University will annually monitor sports information personnel resources with regard to quantity and quality and make adjustments if imbalances are discovered.


(a) Describe how the institution has ensured a complete study of the program area. This study must be conducted as part of the self-study process.

The University of Montana (UM) Department of Intercollegiate Athletics (IA) has ensured a complete study of the program areas through a two-phase comprehensive review process, largely but not exclusively in preparation for the NCAA Cycle 3 Certification Self-Study.

Phase one of the review was initiated by the Senior Associate Athletic Director (SAAD) to explore adding a female sport (or two), and to determine whether the University was providing equal treatment to males and females in all intercollegiate athletic programs. For this, the SAAD requested a Title IX Compliance Self-Audit from the UM Equal Opportunity and Affirmative Action (EO/AA) Office. The EO/AA Director and a UM Legal Counsel paralegal commenced data collection in spring 2010 and concluded with a report issued in October 2010 (see Appendix ?, Report and Recommendations for Title IX Compliance). Evidence collected and analyzed included the following: relevant athletic department and institutional documents; a survey of the coaching staff, administrators, and two student athletes per sport (see Appendix ?, Sample Title IX Compliance Self-Audit Instruments); interviews with select personnel; and a facilities site visit.

The NCAA Cycle 3 Certification Operating Principle 3.1 Gender Issues Subcommittee (see Appendix ?, Plan for Conducting the NCAA Division I Athletics Certification Self-Study) conducted phase two of the self-study, beginning its review in early November 2010. The Subcommittee confirmed, or rejected, the Title IX Compliance Self-Audit findings as each related to the Operating Principle 3.1 Gender Issues, and it performed additional data collection and analysis as recommended in the self-audit and to satisfy their requirements for data-driven conclusions.

The Subcommittee gathered additional evidence through interviews and questionnaires distributed to a sample of coaches, staff, student-athletes, and personnel outside of the IA department. The Subcommittee also conducted a comprehensive document analysis, including but not limited to the items reviewed during the self-audit. Lastly, the Subcommittee toured the athletic facilities located on the mountain and south campuses.

Utilizing the process described above, compliance in this program area was determined by assessing the equivalence of the amount of administrative assistance provided to the respective programs and amount of secretarial and clerical assistance. Items relevant to this inquiry include office sizes, location and convenience of offices, access to telephones, proximity to machines and the sharing of offices in the male and female programs. Other factors include travel arrangements, ticket sales, budget preparation, pep bands, cheerleaders, concessions, fundraising, and filming and video capacity for both home and away competitions.
(b) Provide data demonstrating the institution's status and commitment across the program area.

The Athletic Director is the head administrator for the Department of Intercollegiate Athletics. He is responsible for the entire athletic program. He oversees the finances, budget, fundraising, marketing, promotions, equipment and supplies, and athletes’ treatment. He makes the final budget determinations and the final personnel decisions in the department. He reports to the President of the University.

There are four associate athletic directors who report to the AD. They are: Senior Associate Athletic Director, External & Media Relations; Development; and Internal Operations. There is an Assistant AD for fiscal operations. There is also an assistant to the Athletic Director and an administrative assistant. The Athletic Director directly supervises the men’s coaching staff, and the Director of Sports Information (SID), the Director of Marketing and Media, and other administrative staff. The Senior Associate Athletic Director supervises the women’s programs coaching staff, the athletic trainer and staff, a compliance assistant, and the academic services coordinator and advisor. The Senior Associate Athletic Director is responsible for NCAA and Big Sky Conference compliance. The SID and Assistant SID provide publicity and promotion of the athletic programs. The SID performs these duties for football and men’s basketball. The Assistant SID performs these duties for the women’s sports. The SID helps the Assistant SID with these duties for women’s basketball and men’s and women’s cross-country and track teams.

There are three administrative associates assigned to various sports: one for football, one for men’s and women’s basketball, and one for all other sports. Most coaches indicated that the clerical assistance is minimal and they do much work themselves. The administrators of the athletic program are located in the Hoyt Athletic Complex. Administrative support is in close proximity. The coaches are also located in offices in the Hoyt Athletic Complex. Proximity to administrative support is similar for all coaches. The academic advisors are located across campus in the Lommasson Center.

The following data represents the expenses for support services from the NCAA Financial Reports for 2008, 2009, and 2010 by gender.

| Three-Year Comparison of Support Services Expenses and Participation | NCAA Financial Reports |
|---|---|---|---|---|---|---|
| | 2010 | 2009 | 2008 |
| % support services expense | Men's | Women's | Men's | Women's | Men's | Women's |
| 51% | 49% | 53% | 47% | 51% | 49% |
| % participants by gender | 59% | 41% | 60% | 40% | 60% | 40% |

| 2008 - 2010 |
|---|---|
| average support services expenses | Men's | Women's |
| 52% | 48% |
| average participation | 60% | 40% |

All coaches have their own offices, with the exception of the men’s and women’s tennis coaches, who share an office. Two of the assistant football coaches share an office. The Athletics Executive Staff meeting minutes of 8/3/2010 noted that the head cross country coach, a woman, was assigned her own office as part of a larger office relocation. Generally, computers, blackberries, and laptops for travel are available to coaches. They have access as necessary to AV equipment and a conference room.
The Athletic Department Policy and Procedures Handbook (pg. 1) and the Student-Athlete Handbook (pg. 37) reference the campus Non-Discrimination Policy, which outlines the process for reporting discriminatory behavior or practices e.g., gender inequities in support services.

(c) Using the data provided in (b) above, analyze and explain how the institution is meeting the needs of the underrepresented gender in the athletics program (any differences should be clearly explained in the institution's narrative response, including any deficiencies the institution identifies in its analysis).

The average expenses for support services from the NCAA Financial Reports for 2008, 2009, and 2010 compared to the average athletic participation by gender do not reveal any disparity between the men’s and women’s programs. The University is providing equivalent support services for men’s and women’s teams. The Senior Associate Athletic Director also indicated to the subcommittee chair that there is an open-door policy regarding gender-related complaints in addition to the publicized campus process for reporting issues of discrimination as a student-athlete, staff member, or coach.

(d) Explain how the institution's written, stand-alone plan for gender issues addresses the program area, including any deficiencies identified in the institution's narrative response as listed in item (c) above.

The University will continue to maintain equity and monitor support services and office space for the men’s and women’s programs.

13. Recruitment of Student-Athletes. Equal opportunities for professional personnel to recruit; availability of financial and other resources for recruitment; equivalent benefits, opportunities and treatment of prospective athletes.

(a) Describe how the institution has ensured a complete study of the program area. This study must be conducted as part of the self-study process.

The University of Montana (UM) Department of Intercollegiate Athletics (IA) has ensured a complete study of the program areas through a two-phase comprehensive review process, largely but not exclusively in preparation for the NCAA Cycle 3 Certification Self-Study.

Phase one of the review was initiated by the Senior Associate Athletic Director (SAAD) to explore adding a female sport (or two), and to determine whether the University was providing equal treatment to males and females in all intercollegiate athletic programs. For this, the SAAD requested a Title IX Compliance Self-Audit from the UM Equal Opportunity and Affirmative Action (EO/AA) Office. The EO/AA Director and a UM Legal Counsel paralegal commenced data collection in spring 2010 and concluded with a report issued in October 2010 (see Appendix ?, Report and Recommendations for Title IX Compliance). Evidence collected and analyzed included the following: relevant athletic department and institutional documents; a survey of the coaching staff, administrators, and two student athletes per sport (see Appendix ?, Sample Title IX Compliance Self-Audit Instruments); interviews with select personnel; and a facilities site visit.
The NCAA Cycle 3 Certification Operating Principle 3.1 Gender Issues Subcommittee (see Appendix ?, Plan for Conducting the NCAA Division I Athletics Certification Self-Study) conducted phase two of the self-study, beginning its review in early November 2010. The Subcommittee confirmed, or rejected, the Title IX Compliance Self-Audit findings as each related to the Operating Principle 3.1 Gender Issues, and it performed additional data collection and analysis as recommended in the self-audit and to satisfy their requirements for data-driven conclusions.

The Subcommittee gathered additional evidence through interviews and questionnaires distributed to a sample of coaches, staff, student-athletes, and personnel outside of the IA department. The Subcommittee also conducted a comprehensive document analysis, including but not limited to the items reviewed during the self-audit. Lastly, the Subcommittee toured the athletic facilities located on the mountain and south campuses.

Compliance was determined in this program area by utilizing the process described above to assess: whether coaches are provided substantially equal opportunities to recruit; whether the financial and other resources made available for recruitment in men’s and women’s athletic programs are equivalently adequate to meet the needs of each program; and whether the differences in benefits, opportunities, and treatment afforded prospective athletes of each sex have a disproportionately limiting effect upon recruitment of students of either sex.

(b) Provide data demonstrating the institution's status and commitment across the program area.

All sports at The University of Montana follow NCAA rules for recruiting. The coaches spend significant amounts of time recruiting. Both cross country coaches went on two recruiting trips last season. They spend about 3-6 hours per week recruiting and about 10 student-athletes are subsidized to come for a recruiting visit to campus. Five to seven people available to recruit for track and field. There were three recruiting trips last year. About 8-15 student-athletes are subsidized to come to UM on a recruiting trip. The coach for the men’s tennis team goes on approximately two recruiting trips per year. Men’s tennis subsidizes about 3 student-athletes for a recruiting trip. The women’s tennis coach went on one recruiting trip last year and two student-athletes were subsidized to come to campus for a recruiting trip. In men’s basketball, four people travel for recruiting. Up to 8-12 student-athletes are subsidized to come to campus for a recruiting visit. Coaches take 20-30 recruiting trips per year. Women’s basketball also has four people available for recruitment travel. They take 10-20 recruiting trips. Approximately 5-10 student-athletes are subsidized to come to campus for a recruiting trip.

In men’s football, 30 student-athletes are subsidized to come to campus for recruiting trips. There are nine individuals available to help with recruiting for the football team. In women’s golf, the coach goes on two recruiting trips per year. Two student-athletes are subsidized to come to campus. In women’s soccer, the head and assistant coaches go on about 10 recruiting trips per year. Three coaches are available for recruiting. About 8 – 9 student-athletes are subsidized to come to campus for a recruiting trip. In women’s volleyball, all three coaches recruit. They take about 15 trips per year. Eight student-athletes are subsidized to come for a campus visit. Both men’s and women’s teams have highlight tapes and promotional videos available for recruitment. No team reported having courtesy cars available for recruiting. The football team reported having the Canyon Club available.

Based on the NCAA Financial Report for the year 2009, men’s basketball spent $61,720 on recruiting compared to women’s basketball which spent $26,789 for recruiting. This apparent trend is also evident in 2008 and 2010; the women’s basketball program spends less than half on recruiting when compared to the men’s basketball program.
Recruiting Expense by Sport
NCAA Financial Reports
FY 2007-08 to FY 2009-10
Date 2.12.2011

<table>
<thead>
<tr>
<th>Sport</th>
<th>2008</th>
<th>2009</th>
<th>2010</th>
</tr>
</thead>
<tbody>
<tr>
<td>Women's Tennis</td>
<td>$4,194</td>
<td>$617</td>
<td>$3,759</td>
</tr>
<tr>
<td>Men's Tennis</td>
<td>$3,192</td>
<td>$835</td>
<td>$1,760</td>
</tr>
<tr>
<td>Women's Basketball</td>
<td>$32,570</td>
<td>$26,789</td>
<td>$20,541</td>
</tr>
<tr>
<td>Men's Basketball</td>
<td>$67,398</td>
<td>$61,720</td>
<td>$63,266</td>
</tr>
<tr>
<td>Football</td>
<td>$117,096</td>
<td>$33,875</td>
<td>$95,131</td>
</tr>
<tr>
<td>Women's Track</td>
<td>$3,263</td>
<td>$567</td>
<td>$1,800</td>
</tr>
<tr>
<td>Men's Track</td>
<td>$3,896</td>
<td>$999</td>
<td>$8,296</td>
</tr>
<tr>
<td>Women's Soccer</td>
<td>$26,023</td>
<td>$6,571</td>
<td>$22,513</td>
</tr>
<tr>
<td>Women's Golf</td>
<td>$1,331</td>
<td>$1,080</td>
<td>$2,357</td>
</tr>
<tr>
<td>Women's Volleyball</td>
<td>$25,457</td>
<td>$19,967</td>
<td>$23,112</td>
</tr>
<tr>
<td><strong>Total Men's Sports</strong></td>
<td>$191,582</td>
<td>$97,429</td>
<td>$168,453</td>
</tr>
<tr>
<td><strong>Total Women's Sports</strong></td>
<td>$92,838</td>
<td>$55,591</td>
<td>$74,082</td>
</tr>
</tbody>
</table>

% spent recruiting for Men's sports | 67% | 64% | 69%
% spent recruiting for Women's sports | 33% | 36% | 31%

Overall the men’s teams spent $191,582, $97,429, and $168,453 in 2008, 2009 and 2010 respectively on recruiting compared to the women’s teams which spent $92,838, $55,591, and $74,082 in 2008, 2009 and 2010 respectively on recruiting. The men’s teams spent 67 percent, 64 percent and 69 percent of the total recruitment dollars in 2008, 2009 and 2010 respectively and the women’s teams spent 33 percent, 36 percent, and 31 percent of the total recruitment dollars in 2008, 2009 and 2010 respectively.

When comparing the average recruiting expenses from 2008, 2009, and 2010 with the average athletic participation by genders, the women’s program receives 7 percentage points less of the recruitment dollars than their rate of participation. In contrast, the male sports receive 7 percentage points more of the recruitment dollars than their rate of participation.

<table>
<thead>
<tr>
<th>NCAA Report Recruiting Expenses</th>
<th>2008</th>
<th>2009</th>
<th>2010</th>
<th>Average</th>
<th>%</th>
</tr>
</thead>
<tbody>
<tr>
<td>Men' Teams</td>
<td>$191,582</td>
<td>$86,673</td>
<td>$168,453</td>
<td>$148,903</td>
<td>67%</td>
</tr>
<tr>
<td>Women's Teams</td>
<td>$92,838</td>
<td>$49,034</td>
<td>$74,082</td>
<td>$71,985</td>
<td>33%</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td>$220,887</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>EADA Athletics Participation</th>
<th>2008</th>
<th>2009</th>
<th>2010</th>
<th>Average</th>
<th>%</th>
</tr>
</thead>
<tbody>
<tr>
<td>Men</td>
<td>262</td>
<td>259</td>
<td>256</td>
<td>259</td>
<td>60%</td>
</tr>
<tr>
<td>Women</td>
<td>172</td>
<td>175</td>
<td>176</td>
<td>174</td>
<td>40%</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td>433</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

average men's recruiting expense 67%
average men’s participation 60%
difference 7%

average women's recruiting expense 33%
average women’s participation 40%
difference -7%
(c) Using the data provided in (b) above, analyze and explain how the institution is meeting the needs of the underrepresented gender in the athletics program (any differences should be clearly explained in the institution's narrative response, including any deficiencies the institution identifies in its analysis).

Overall, there is a notable disparity between the recruitment dollars spent on the male athletic program recruitment compared to the female athletic program recruitment with respect to participation rates. This is partly attributable to the numbers of athletes needed for the football program; significant in-state and out-of-state travel is required (proportionately, more out of state travel is required).

Additionally, this disparity can be explained by the women’s basketball team’s history of recruiting predominantly within the state. The head women’s basketball coach reportedly feels if he needs additional money for recruitment, it is available.

In 1993, the Office of Civil Rights found that the University was not providing equivalent budget amounts, resources, and support to men’s and women’s athletic programs for recruitment of female athletes. It appears that the situation has improved since 1993, but still has room for improvement.

(d) Explain how the institution's written, stand-alone plan for gender issues addresses the program area, including any deficiencies identified in the institution's narrative response as listed in item (c) above.

The University will address the deficiency of perceived inequity in recruitment by identifying and correcting recruiting budget imbalances annually during the budgeting process. This will ensure the women’s program, especially women’s basketball, is granted the same amount of money for recruitment as the men’s program. And, if the coaches philosophy is to use the money elsewhere or for less expensive recruiting (i.e., in-state), documentation will exist to show that equitable opportunities have been provided for recruiting. Also, as the institution remedies the gender proportionality of sports by adding Women’s Softball and managing rosters, it is anticipated that the gender inequity in recruiting will be positively impacted.

14. Retention. Programs and services to address retention of staff, coaches and student-athletes from the underrepresented gender within the athletics program; review of retention and promotion of staff and coaches from the under-represented gender within the athletics program, including professional development opportunities (e.g., mentoring programs), rate of compensation, duration of contracts, conditions relating to contract renewal.

(a) Describe how the institution has ensured a complete study of the program area. This study must be conducted as part of the self-study process.

The NCAA Cycle 3 Certification Operating Principle 3.1 Gender Issues Subcommittee (see Appendix ?, Plan for Conducting the NCAA Division I Athletics Certification Self-Study) conducted the a complete study of this program area, beginning its review in early November 2010. The Subcommittee gathered evidence through interviews and questionnaires distributed to a sample of coaches, staff, student-athletes, and personnel outside of the IA department. The Subcommittee also conducted a comprehensive document analysis, including but not limited to the...
items reviewed during the Title IX Self-Audit, which did not directly review this program area. Lastly, the Subcommittee toured the athletic facilities located on the mountain and south campuses.

Utilizing the process described above, compliance in this program area was determined by a comprehensive review of the programs and services to address retention of staff, coaches and student-athletes from the under-represented gender within the athletics program; retention and promotion of staff and coaches from the under-represented gender within the athletics program; professional development opportunities (e.g., mentoring programs); the rate of compensation, duration of contracts, and conditions relating to contract renewal.

(b) Provide data demonstrating the institution's status and commitment across the program area.

The University of Montana (UM) provides programs and services to address retention of staff, coaches and student-athletes from the underrepresented gender for all campus community members. Department of Intercollegiate Athletics (IA) coaches, staff, and student-athletes are eligible to attend. Examples of these programs and services include: Day of Dialogue, Women’s Resource Center, Student Assault Resource Center (SARC), Health Enhancement, Human Resource Services - Quality Work Life, Women’s and Gender Studies Program, and the like. Retention of female coaches, staff, and student-athletes is also addressed through the following mechanisms: Equal Opportunity and Affirmative Action Office, Human Resource Services, Student Conduct Code, Student-Athlete Handbook (pp. 35-40), Sexual Harassment Policy (Number 406.5.1), Sexual Misconduct, Sexual Relationship Violence, and Stalking Policy (Number 406.5), Breastfeeding Policy (Number 406.7), Dependent Care – Workplace Alternatives Policy (Number 402.1), Discrimination Grievance Policy (Number 407.1), Equal Opportunity Policy/Non-Discrimination (Number 406.4), and IA personnel e.g., Athletic Director and Senior Associate Athletic Director.

[exhibits]

http://life.umt.edu/dod/
http://www.umt.edu/wcenter/
http://life.umt.edu/curry/SARC/
http://life.umt.edu/curry/HEALTHE
http://www.umt.edu/hrs/qualityworklife/
http://www.cas.umt.edu/wsprog/
http://www.umt.edu/co/
http://www.umt.edu/hrs/
http://life.umt.edu/vpsa/student_conduct.php
http://www.umt.edu/Policies/400-HumanResources/sexualharassment.aspx
http://www.umt.edu/Policies/400-HumanResources/sexualmisconduct.aspx
http://www.umt.edu/Policies/400-HumanResources/breastfeeding.aspx
http://www.umt.edu/Policies/400-HumanResources/dependant.aspx
http://www.umt.edu/Policies/400-HumanResources/discriminationgrievance.aspx
http://www.umt.edu/Policies/400-HumanResources/nondiscrimination.aspx

According to the employment data for IA staff (coaches and others) provided by the Office of Planning, Budgeting and Analysis (OPBA) and promotion and raise requests provided by the SAAD, there are instances where female coaches and staff have been promoted and received salary increases. Whether this is an attempt at retaining female personnel cannot be determined.

The SAAD reported that professional development opportunities are available to all staff and coaches on an equitable basis with regard to gender. Although not formalized, each staff member
or coach must get approval from her/his supervisor to participate in a professional development opportunity. There is no formal process for allocating funds for professional development requests or process for vetting requests to ensure equity among the genders.

IA staff and contract professionals adhere to the following Human Resource Services policies and procedures for compensation, promotion, or other retention mechanisms. Policies and procedures are intended to positively impact retention of female coaches, staff, and student-athletes and ensure gender equity.

Policy (no Number) Promotion - Non-Faculty Contract Professional Positions
http://www.umt.edu/Policies/400-HumanResources/promotion.aspx

Policy Number 405.1.8 Staff Professional Development Leave
http://www.umt.edu/Policies/400-HumanResources/devleave.aspx

Staff Compensation Guidelines
http://www.umt.edu/hrs/compguide.htm

The duration of contracts and conditions relating to contract renewal for coaches varies by sport yet appears consistent among the men’s and women’s programs. The head coaches for men’s and women’s basketball and football (“Revenue Sports”) have 3-year contracts, all other coaching staff are on letters of appointment or non multi-year contracts. The head coaches for soccer, volleyball, track/cross-country, women’s and ten’s tennis, and women’s golf are also on letters of appointment or non multi-year contracts. A 3-year contract is renewable at the end of the 3-year term; whereas, a letter of appointment is contingent upon funding.

The data in the 2008-2010 NCAA Financial Reports (ID 19 and 20) was used to determine equity among the women’s and men’s programs in this area. This data includes all coaching staff and their respective gross salaries, bonuses and benefits, and any compensation paid to the coaching staff by a third party contractually guaranteed by the institution. The compensation for the cross country and track programs are not included in this analysis, because the same coaching staff is used for the men’s and women’s programs in these sports.

<table>
<thead>
<tr>
<th>3-Year Comparison of Coaches’ Salaries from NCAA and EADA Reports</th>
</tr>
</thead>
<tbody>
<tr>
<td><img src="https://example.com/3-year-comp-salaries.png" alt="3-Year Comparison of Coaches' Salaries from NCAA and EADA Reports" /></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>% salary expense by gender</th>
<th>Men’s</th>
<th>Women’s</th>
<th>Men’s</th>
<th>Women’s</th>
<th>Men’s</th>
<th>Women’s</th>
</tr>
</thead>
<tbody>
<tr>
<td>2008</td>
<td>63%</td>
<td>37%</td>
<td>59%</td>
<td>41%</td>
<td>63%</td>
<td>37%</td>
</tr>
<tr>
<td>2009</td>
<td>59%</td>
<td>41%</td>
<td>60%</td>
<td>40%</td>
<td>60%</td>
<td>40%</td>
</tr>
</tbody>
</table>

On average, the total funds for the last three years paid to the men’s program for coaching is $1,512,163, or 62 percent. The total funds paid to the women’s program for coaching is $944,174 or 38 percent. The average participation rates of men and women in the athletic program are 60 percent and 40 percent respectively. When analyzed with respect to the participation rate in female athletics, there is only a 2 percentage point difference between the average coaching budget allocated to the women’s program (38 percent) and the average rate of participation in the women’s athletic program based on 2008, 2009, and 2010 NCAA Financial data (40 percent).
(c) Using the data provided in (b) above, analyze and explain how the institution is meeting the needs of the underrepresented gender in the athletics program (any differences should be clearly explained in the institution's narrative response, including any deficiencies the institution identifies in its analysis).

The institution provides programs and opportunities that address retention of female staff, coaches, and student-athletes at a satisfactory level. There are no apparent deficiencies in the attention the University pays to ensuring equal opportunity for promotion of staff and coaches from the underrepresented gender within the athletics program; professional development opportunities; the rate of compensation, duration of contracts, and conditions relating to contract renewal.

(d) Explain how the institution's written, stand-alone plan for gender issues addresses the program area, including any deficiencies identified in the institution's narrative response as listed in item (c) above.

Although no deficiencies were identified in the Retention program area, because it is a new program area, the University has established areas for improvement. The analysis revealed there is no formal process for allocating funds for staff and coaches’ professional development nor any process for vetting requests to ensure equity among the genders. Thus, the institution will provide opportunities during budgeting for professional development requests and they will be vetted with the IA Budget Committee. Additionally, student-athletes are not always aware of campus programs and activities related to gender-specific issues. The University will improve by better communicating these current program/activity opportunities to student-athletes.

15. Participation in Governance and Decision Making. Involvement of athletics department staff, coaches and student-athletes from the under-represented gender within the athletics program in the governance and decision-making processes of the athletics department; provision of leadership opportunities for all student-athletes (e.g., participation on student-athlete advisory committee) and athletics department staff and coaches (e.g., participation at the conference and/or national level).

(a) Describe how the institution has ensured a complete study of the program area. This study must be conducted as part of the self-study process.

The NCAA Cycle 3 Certification Operating Principle 3.1 Gender Issues Subcommittee (see Appendix ?, Plan for Conducting the NCAA Division I Athletics Certification Self-Study) conducted the a complete study of this program area, beginning its review in early November 2010. The Subcommittee gathered evidence through interviews and questionnaires distributed to a sample of coaches, staff, student-athletes, and personnel outside of the IA department. The Subcommittee also conducted a comprehensive document analysis, including but not limited to the items reviewed during the Title IX Self-Audit, which did not directly review this program area.

Utilizing the process described above, compliance in this program area was determined by assessing: the involvement of athletics department staff, coaches and student-athletes from the under-represented gender within the athletics program in the governance and decision-making processes of the athletics department; and the provision of leadership opportunities for all student-athletes (e.g., participation on student-athlete advisory committee) and athletics department staff and coaches (e.g., participation at the conference and/or national level).
(b) Provide data demonstrating the institution's status and commitment across the program area.

The Department of Intercollegiate Athletics (IA) has several committees that contribute to and provide opportunities for shared governance, with the University Athletics Committee (UAC) and the Student-Athlete Advisory Committee (SAAC) the primary committees.

The UAC is appointed by the UM President to provide review and counsel for the IA program and directly to the Athletic Director and Senior Associate Athletic Director. The UAC includes members from across campus, including students. There are currently five women and fourteen men on this committee.

The SAAC consists, generally, of one or two representatives from each sport. The committee meets at least once a month and acts as a link between student-athletes, administration, and the NCAA. The SAAC currently has seven female and six male student-athlete members and collectively represent most of the sports. The committee is currently chaired by a women’s basketball player.

The UM intercollegiate athletics five-year strategic plan was developed by two planning groups: the core working group and the Athletic Strategic Planning Committee (ASPC). The core working group (or the “Executive Planning Group”) is the smaller of the two and did the bulk of the detail planning, based on valuable input from the larger ASPC (see Appendix/Exhibit ?, UM Athletic Strategic Plan, Planning Committee). The Executive Planning Group has six members, one woman and five men. The ASPC includes all members of the Executive Planning Group and an additional four men and three women.

(c) Using the data provided in (b) above, analyze and explain how the institution is meeting the needs of the underrepresented gender in the athletics program (any differences should be clearly explained in the institution's narrative response, including any deficiencies the institution identifies in its analysis).

Women are proportionately represented on the various groups and committees that provide leadership in the IA department. The Senior Associate Athletic Director has recommended that staff from athletics serve on the Diversity Advisory Council and Day of Dialogue Planning Committees, and the University President has recently made these appointments official: the Coordinator of Athletic Academic Services now serves on the Day of Dialogue planning committee, and the IA Academic Advisor serves on the Diversity Advisory Committee. Having representatives from intercollegiate athletics on these committees benefits the IA department, the University, and the committees through greater opportunity for reciprocal campus participation and input related to gender equity.

(d) Explain how the institution's written, stand-alone plan for gender issues addresses the program area, including any deficiencies identified in the institution's narrative response as listed in item (c) above.

Although not a deficiency per se, some athletic committee memberships are not balanced in terms of gender participation. To improve in this area the University will increase female participation on the University Athletic Committee (UAC) and continue to include IA staff on University committees, like Day of Dialogue and the Diversity Advisory Committee.
10. Using the plan for improvement section, provide an institutional gender-issues plan that addresses all fifteen aforementioned program areas for the department of athletics. The plan must include all required elements of a plan as noted by the committee. If a deficiency does not exist in a program area(s), the institution must include an evaluation mechanism to maintain the institution's status in that program area(s) and action steps the institution will take if the program area(s) becomes inequitable in the future. Finally, the institution must describe how it will review its plan on an annual basis and include this information in the institution's gender-issues plan.

Within gender-issues and diversity-issues written plans, specific numerical targets may place an institution at legal risk and are not expected in an institution's written plan, particularly as it relates to hiring practices. In the program area of hiring practices, institutions may submit plans that have broad, flexible non-numeric hiring goals. As it relates to other program areas, including but not limited to participation rates and budget increases, specific numerical targets may be appropriate.

The institution must develop a five-year written, stand-alone plan addressing gender issues that maintains an institution's conformity or moves an institution into conformity with the operating principle. The institution's plan must be active at all times and include a mechanism to ensure the plan is reviewed on an annual basis, including a comparison with its EADA report and NCAA financial report, to determine if the course of action is still appropriate and this information must be included in the institution's gender-issues plan.

[See The University of Montana Intercollegiate Athletics Gender Equity Plan, 2011-12 to 2015-16 – Item 10; separate Excel file]

11. Describe how the institution will annually compare its gender-issues plan with its EADA reports and NCAA financial reports to determine if the course of action is still appropriate. Further, please provide the names and titles of the individuals who will be responsible for this review.

The institution's plan must be active at all times and include a mechanism to ensure the plan is reviewed on an annual basis, including a comparison with its EADA report and NCAA financial report, to determine if the course of action is still appropriate and this information must be included in the institution's gender-issues plan.

Response:

No formal, written policy and procedure exists to evaluate the five-year Gender Equity Plan on an ongoing basis. The University will address this issue through the following measurable goals:

1. The Title IX and Gender Equity Committee will establish procedures to annually review the plan, document progress, and recommend to the Athletic Department on adjustments as needed;

2. The Senior Associate Athletic Director (SAAD) will continue to report exit survey feedback to University Athletics Committee (UAC); and

3. The SAAD will continue to report on the status of NCAA Certification Plan for Gender Equity to the University Athletics Committee.

12. Describe the institution's efforts to ensure the gender-issues plan for improvement was developed through a process involving broad-based campus participation and has received formal institutional approval. Further, please identify the length (e.g., five years) of this plan, including the specific years this plan will be active.

If a plan concludes before the commencement of the institution's next self-study, the institution is expected to create a new five-year plan for improvement, even if each of the actions in the institution's original plan were
ongoing in nature. The institution must develop a new five-year plan that will maintain conformity with the operating principle. Please note that all institutional plans must contain all of the committee’s required elements.

The institution’s gender-issues plan must include the following requirements:

1. Include identification of issues or problems confronting the institution.
2. Include measurable goals the institution intends to achieve to address issues or problems.
3. Include specific steps the institution will take to achieve its goals.
4. Include a specific timetable(s) for completing the work.
5. Identify the individuals and/or offices responsible for carrying out the actions identified by the institution.

Further, the institution's gender-issues plan must meet the following requirements:

1. Be committed to paper and be a stand-alone document.
2. Be developed with opportunities for significant input from appropriate constituent groups inside and outside athletics.
3. Must be adopted formally by the institution's final authority in such matters (i.e., chancellor/president or board of trustees) to ensure that it carries the commitment and support of the entire institution.

Response:

The University of Montana Gender Equity Plan is a stand-alone planning document, was developed with opportunities for significant input from appropriate constituent groups inside and outside athletics, and was adopted formally by the University’s final authority in such matters – President Royce Engstrom – to ensure that it carries the commitment and support of the entire institution.

The University has similarly ensured that its gender-issues improvement plan, as part of its NCAA 2011 (Cycle 3) certification process, was also developed through a process involving broad-based campus participation. The NCAA 2011 Certification Gender Issues Subcommittee (Operating Principle 3.1) identified progress and/or deficiencies since the Cycle 2 certification. The Senior Associate Athletic Director and the Gender Issues Subcommittee compiled the issues and identified measurable goals and action steps to either rectify deficiencies or maintain what progress has been achieved. The plan was vetted by the NCAA Certification Steering Committee, the Co-chairs, the University Athletic Committee, and the campus public. Ultimately, it, too, was adopted by the President of the University.