

The Impacts of Title IX on Athletic Programs Across the Country

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Background

The number and types of athletic programs in colleges and universities across the United States is changing dramatically. Programs that used to be extremely successful at some institutions are being cut, as others are being born to replace them. The root causes of these changes are many; universities are struggling for funding, tastes of athletes and spectators are changing, and the size of rosters costs too many scholarships for schools to continue some programs, for example. Perhaps the most significant reason for these changes is much different than the rest, however: Title IX, a law requiring gender equity in educational and athletic programs.

Title IX has impacted college programs, in both education and athletics, in ways that the initial legislators of the law would not have imagined. In athletic terms, the changes are profoundly affecting the number of sports offered to athletes of each gender. This work will examine the history of Title IX, and describe the various cases that have impacted the current status of intercollegiate athletics. Then, the author will attempt to predict the future of athletic program livelihoods, using the example of colleges and universities in the state of Indiana as a guide for further understanding of this evolving and complex topic on the modern collegiate campus.

The History of Title IX

Title IX was passed by Congress on June 23, 1972 to prohibit gender discrimination in the nation's education programs. The law itself reads as follows: "No person in the United States shall, on the basis of sex be excluded from participation in, or denied the benefits of, or be subjected to discrimination under any educational program or activity receiving federal aid."¹ The jurisdiction of this law rests on three basic elements.² The first is gender discrimination, meaning that Title IX protects only gender, rather than age or race, discrimination. The second is federal funding, which is required for Title IX to be enforceable. The third is that an educational program must be involved. The term program was defined by the court, in the *Grove City v. Bell* case, as any subunit of an institution. *Grove City* showed that subunits that do not receive federal funding are not subject to Title IX constraints.³

Title IX may be enforced through three main pathways.⁴ First, institutions must have a designated Title IX officer. The second path is through the Office for Civil Rights of the U.S. Department of Education, which accepts administrative complaints from individuals, then issues a letter of resolution to the institution, explaining what must be done to alleviate the previous wrongdoing. Third, federal lawsuits can be filed

by someone with legal standing. Since the 1992 trial of *Franklin v. Gwinnett County Public Schools*, which established that compensatory and punitive damages are available to those who accept intentional gender discrimination, the number of cases choosing this method of solution has increased dramatically.⁵

The main area that Title IX focuses on, in terms of athletics at the collegiate level, is participation opportunities. Policy interpretations have shown that institutions have effectively accommodated the interests of students if they have one of the following three benchmarks:

1. "Participation opportunities for male and female students are provided in numbers substantially proportionate to their respective enrollments; or
2. The institutions can show a history and continuing practice of program expansion demonstrably responsive to the developing interest and abilities of the members of the under represented sex; or
3. The institution can show that it is fully and effectively meeting the interests and abilities of the under represented sex."⁶

Institutions that have ignored these benchmarks are now facing difficulties. The most encompassing and easiest to prove of the above is benchmark one; it may also be the most difficult to achieve. Institutions that have failed to meet this benchmark have been found to violate effective accommodation to both sexes, and, therefore, either face the possibility of losing their federal funding and/or being liable for compensatory and punitive damages in relation to their violations.⁷

Title IX also requires institutions to offer benefits, opportunities, and treatments to both genders in an equivalent manner, though the opportunities must not be identical. Eleven program components make up individual aspects of Title IX:⁸

1. Equipment and Supplies: quality, suitability, quantity, availability.
2. Scheduling of Games and Practice Time: by sport, time, number, season, opportunity.
3. Travel and Per Diem Allowances: transportation, housing, dining.
4. Opportunity to Receive Academic Tutoring:

availability, experiences, and rates of pay of tutors.

5. Opportunity to Receive Coaching, Assignment, and Compensation: availability, assignment of coaches, assistants, and graduate assistants.
6. Locker Rooms, Practice, and Competitive Facilities: quality, availability, exclusivity.
7. Medical and Training Facilities and Services: quality of personnel, trainers, facilities, insurance.
8. Housing and Dining Facilities and Services: during regular year, pregame and postgame meals, housing and dining services when classes are not in session.
9. Publicity: availability and quality of sports information, publicity, publications, and promotions.
10. Support Services: administrative, clerical, secretarial support.
11. Recruitment of Student-Athletes: opportunities for coaches to recruit, adequate resources, and treatment of athletes must be proportionate.⁹

Several law cases have impacted the history and interpretation of Title IX, and those that describe the proportionality issues of this work are discussed below. A general timeline of the law's history follows, for further understanding.¹⁰

A TITLE IX TIMELINE

May 1974: Sen. John Tower introduces an amendment, that is defeated, to exempt revenue-producing intercollegiate athletics from Title IX.

June 1974: The Department of Health, Education, and Welfare (HEW) issues proposed regulations to implement Title IX.

July 1978: The three-year period for colleges and universities to comply with Title IX ends.

December 1978: The Office for Civil Rights issues policies to help schools comply with Title IX in intercollegiate athletics.

December 1979: HEW issues final policy interpretation. A three-part test is set up to determine a school's compliance with the law. A school must successfully answer one of the fol-

lowing three questions: Are opportunities for female and male athletes proportionate to their enrollment? Does the school have a history of expanding athletic opportunities for the under-represented sex? Has the school demonstrated success in meeting the needs of those students?

February 1984: Title IX is ruled to only concern educational programs that receive federal financial aid (result of *Grove City* case).

March 1988: Congress overrides veto of Civil Rights Restoration Act of 1987. The act overrules the *Grove City* case.

June 1988: Temple agrees to increase opportunities for female athletes. In 1996, male athletes file suit, charging discrimination on behalf of their sex (*Haffer v. Temple University*).

April 1992: Brown University's women's gymnastics and volleyball teams file a class-action suit against the university. They allege gender discrimination and violations of Title IX. In May 1991, Brown dropped water polo and golf to help reduce their \$1.6 million budget deficit. (see *Cohen v. Brown University* below)

September 1992: U.S. District Court determines that Colgate University did not provide equal treatment for women's hockey players. The decision was vacated on appeal (see *Cook v. Colgate University* below)

October 1992: The Indiana University of Pennsylvania is found to have failed the Court's three part test (see below)

February 1993: Women's softball is reinstated at Colorado State University after former members file suit, seeking reinstatement and damages. The school violated Title IX under the three-part test and was forced to take this retribution.

October 1993: Female athletes at the University of Texas accept a settlement of their suit charging the school with providing unequal opportunities for women. The settlement required the university to bring female participation in athletics to within 3% of that gender's total enrollment and scholarships to within 2% of participation (the new standard in other suits).

December 1993: Cornell University agrees to

reinstate women's gymnastics and fencing rather than going to court after team members file suit.

September 1994: *Cohen v. Brown* begins in Providence, with the Court finding in favor of the female athletes (upheld on appeal in 1996).

April 1997: The U.S. Supreme Court lets the *Brown* ruling stand.

June 1997: The National Women's Law Center files sex discrimination suits against 25 colleges and universities, claiming discrimination against women athletes in scholarship funding.¹¹

The test described in the table above is called the three-prong test. The first prong is substantial proportionality, meaning that sports participation opportunities for men and women must be "substantially proportionate to a school's full-time undergraduate enrollment."¹² The second prong is history and continuing practice, satisfied with a school demonstrates expansion of the under-represented gender's programs.¹³ The third prong is effectively accommodating interests and abilities. As discussed above, this is met when the interests and abilities of the under-represented sex have been fully met.¹⁴

The Proportionality Issue

Introduction

A very intriguing field within Title IX over the past decade has been the proportionality issue. The issue is described through benchmark one above, stating that schools must provide opportunities for each gender "in numbers substantially proportionate to their respective enrollments."¹⁵ This work will specifically analyze this situation, and the trends that athletic departments must follow to show compliance within these proportionality guidelines. Initially, Title IX was written with the main concept being to increase the athletic and educational opportunities for women on the collegiate level. In retrospect, athletically speaking, the law has done that, though this may be at the expense of men's athletics at various levels. The work will show this trend through an analysis of several critical cases involving, in some way, proportionality, then showing a case study involving schools in

the state of Indiana.

Cohen v. Brown University

The benchmark case for Title IX compliance may very well be *Cohen v. Brown University*. Initially, the District Court found that the University violated Title IX by "failing to effectively accommodate interest and abilities of women athletes, failing to steadily increase number of opportunities for women, and ... (offering) a two-tiered structure of intercollegiate varsity program (which) failed to provide equal treatment of athletes."¹⁶ The Appeals Court upheld these violations in 1995.

The suit was filed as a response to the demotion of the women's gymnastics and volleyball teams from varsity to club level sports in May 1991, sports which were fully funded by the University until that time.¹⁷ The Appeals Court saw Brown as an institution that provided the financial resources to raise their town funds through private donations, but also as an entity which used university-funded varsities not necessarily equal to those of donor-funded varsities. This caused a two-tiered system, forcing competitiveness to be difficult for the lower-tiered sport.¹⁸ The Court later found that in 1993-94 (the time of the suit) that 897 athletes were participating in varsity athletics. Of these, 555 were men (61.9%) and 342 were women (38.1%). The undergraduate enrollment of males at the time was 5,722 students, including 2,796 men (48.8%) and 2,926 women (51.14%). These numbers were seen as disparate in the eyes of the Court, meaning that the women's sports must be retained due to Title IX violations.¹⁹

The Court chose to apply the three-prong test outlined above to Brown University, to determine if, and to the extent that, violations occurred under Title IX at the Institution. First, the Court acknowledged that the plaintiffs showed that Brown did not satisfy prong one, substantial proportionality. The numbers described above showed a 13% disparity between participation in intercollegiate athletics and the overall female student enrollment.²⁰ Second, the Court acknowledged that Brown had a fine history of program expansion, but not a con-

tinuing practice of expansion for women, the underrepresented sex.²¹ Third, the Court ruled that despite the fact that Brown had presented opportunities for its under-represented sex, these were not "to the extent necessary to provide equal opportunity in the selection of sports and levels of competition available to members of both sexes."²² By failing to meet the above three criterion, Brown failed the test of Title IX compliance, a ruling upheld by the Supreme Court in April, 1997.

Cook v. Colgate University

Another critical case in terms of Title IX compliance is *Cook v. Colgate University*, involving five students seeking to have the women's hockey club elevated to varsity sport status. The University was ordered to grant varsity status to the club, which they appealed. The decision was vacated and remanded on appeal, allowing the University to survive overall Title IX compliance for the moment.

Varsity sports at Collegiate receive greater status and visibility than club sports, as is the case at any institution, in the eyes of the Court.²³ The club teams can apply to become varsity every two years, which the women's hockey team had done in 1979, 1983, and 1986.²⁴ Colgate was originally ordered to upgrade the women's team to varsity for the 1993-94 academic year, providing equal opportunities to players. The school then appealed, stating that the argument was moot due to the graduation of the team's players.²⁵

The Appeals Court agreed with Colgate that the argument was now moot. The last complaining party would graduate before the team would be implemented, according to the Court, so the case was remanded with instructions to dismiss the action as moot.²⁶

Kelley v. University of Illinois

The original verdict in this case involved the granting of summary judgement in favor of the university, with the court stating that the termination of men's swimming at the University of Illinois, and the retaining of the women's program at that institution, was constitutionally acceptable. The Court of Appeals which first reviewed the case agreed with this ruling. The

United States Court of Appeals, Seventh Circuit, the final ruling body for this particular case, affirmed this same verdict in September, 1994.

In this specific case, the University of Illinois had been shown to be offering women's athletic programs in insufficient proportional amounts, compared to men, for over a decade. The early 1990s forced the university to make significant cuts in the athletic budget, because a significant deficit would have occurred for the university if the football team had not made a bowl game during 1993.²⁷ The Athletic Board of Control, along with the University's Athletic Director, devised a seven criteria plan to determine which sports should be eliminated in an effort to reduce athletic budget costs. The seven criteria were: sponsored by the Big Ten Conference and the NCAA, tradition of a sport's success at the university, the level of interest of the sport at the high school level, the adequacy of the university's facilities for a given sport, the level of spectator interest for the sport, gender and ethnic issues, and the cost of the sport.²⁸ The sport of men's swimming was dropped based on this criteria; the women's program was maintained, because dropping this program meant possible allegations of the university failing to meet the standards set by Title IX.

In the eyes of the court, the decision of the university to maintain women's swimming was "extremely prudent," because the institution would have been vulnerable to Title IX violations by dropping the sport.²⁹ The ruling would still leave men's athletic programs at levels proportionally greater than their enrollment at the institution, meaning that, even though the university was dropping swimming, the campus was accommodating the needs of the male gender.³⁰

The court also ruled that schools were allowed to sponsor teams for each sex "where selection for such teams is based upon competitive skill."³¹ The plaintiffs argued that this was at odds with Title IX; the Court disagreed. Further, the Court stated that a school successfully meets the requirements of Title IX when a statistical balance of athletic opportunities is met for the genders, based on their enrollments at the given school. A potential requirement of forcing parallel teams for certain sports, a propo-

sition argued for by the plaintiffs, was seen by the Court as a way to deny schools the flexibility they need to respond to athletic interests of the genders and to meet the requirements of Title IX. Since discrimination of opportunities for the sexes by campuses is prohibited, and since the goal of the university was to increase the proportionality of athletics for the under-represented gender, the decision by the university was seen as constitutional.³²

Roberts v. Colorado State University

The original Appeals verdict in this case stated that Colorado State University violated Title IX by discontinuing the women's softball program, that an equitable remedy was required for damages, and that softball must play in the next possible exhibition season. The fact that Colorado State violated Title IX by discontinuing the program was affirmed by the United States Court of Appeals, while the other two rulings were cast into grave doubt by this Appeals Court.

The plaintiffs questioned the original jurisdiction of the appeals court. The defendants, on the other hand, maintained that they did not violate Title IX by discontinuing women's softball.³³ The defendant also made two broad objections to the relief offered by the original Court. First, the plaintiffs had proper remedies through the law and, therefore, did not require injunctive relief, according to the defense. Second, the defense argued that they were not given the opportunity to present a plan to comply with Title IX involving sports other than softball. The Appeals Court ruled that the district court ordered an equitable remedy, thus ruling for the plaintiffs in part one. Part two was shown to be true by the Appeals Court, however. The Court stated that "if (the Title IX) violation were remedied in accordance with either of the other two benchmarks of the effective accommodation test, (the) defendant would then no longer be obligated to maintain its softball program."³⁴ Therefore, the Court affirmed the previous ruling in part, reversed in part, and remanded with instructions that the injunction "be modified consistent with this option."³⁵

Favia v. Indiana University of Pennsylvania

Members of the University's women's gymnastics and field hockey teams alleged that the school discriminated based on gender when cutting the programs, making the school subject to Title IX violations. The District Court ruled in the case that, by preliminary injunction, the two teams must be reinstated by the University, as opposed to replacing gymnastics with soccer, as the University had desired. The Appeals Court affirmed the ruling of the lower Court.

The state-affiliated university had an undergraduate enrollment of 6,003 female undergraduate students (55.6% of the population) and 4,790 male students (44.4%). The number of athletic teams at the provided by the Institution was similar, though 313 men were involved in athletics, as opposed to 190 women, a 62-38% ratio. A disparity was also shown in athletic scholarships, with the school offering just 21% of its athletic scholarships to women.³⁶ In mid-1991, the school decided to shrink the size of its athletic department due to budgetary concerns. The original theory of the school called for the dismissal of two sports from each gender, which was shown to be a violation of Title IX by the Court.

The Court ruled that the burden would be transferred to the school for Title IX compliance, shown by the ruling of a preliminary rather than final injunction.³⁷ Further, the Court ruled that if final injunctive relief was necessary, that the District Court should consider violations of federal law to the case, meaning that the school would be judged much more harshly as a repeat offender than in this initial trial.³⁸

Bowers v. Baylor University

The original verdict in this case allowed for the plaintiff, Pam Bowers, to receive damages under the law of Title IX, despite the fact that no provision for this ruling exists within the law itself. The original verdict also allowed the individuals within the suit to be acquitted of any legal wrongdoing within this case, allowing only the school to be held accountable for Title IX compliance. Also, the University asked for a motion to dismiss further claims in the case. The

Appeals Court for the case upheld the first two verdicts, but by holding the school accountable for its actions, denied Baylor's motion to dismiss the case.

In 1989, Bowers complained to the school about "disparate allocation of resources" between the men's and women's basketball coaches and programs at Baylor University.³⁹ The focus of her suit concerned the terms and conditions of her employment. Bowers was terminated from her position in 1993, based on potential rules violations rather than her won-loss record in the program. After filing a complaint with the Equal Employment Opportunity Commission, she was reinstated, and given the same contractual terms as before. Bowers continued to argue that the men's and women's coaches still had differential treatment based on gender, and, on May 31, was terminated because of an unsuccessful win-loss records in the eyes of the school. Bowers argued that this termination was not due to her won-loss record, but as a retaliation maneuver for the discrimination allegations that she was bringing on the school. Thus, Bowers argued that her dismissal was unlawful and an attempt to restrain further discrimination.⁴⁰ She asked for reinstatement as Baylor University's women's basketball coach, back pay and benefits, and compensatory and punitive damages of over \$4 million.⁴¹

The Court was not asked, at this time, to rule whether Title IX violations occurred on campus. Instead, the Court was to determine whether there was probable occurrence of violations, forcing Baylor to return for a full trial, and asked to determine whether individuals can be sued as a result of Title IX violations. Eventually, the Court ruled that yes, the plaintiff argued a valid claim that Title IX can be used to acquire monetary funds from an institution, and that Baylor may be at fault with compliance of the law; the Court also ruled that individuals may not be held accountable for these violations.⁴² Therefore, the case returned to trial, with Baylor University being the sole defendant in the case, and the charges against individuals within the case were dropped.

Who is in Compliance? A local survey

The above cases illustrate the various legal problems that can occur due to the existence of Title IX, in terms of athletics and legalities. The major question involving this topic thus becomes, "What does the future hold in terms of athletic programs?" A question that cannot be answered easily. To determine the future direction of athletic programs, the current state of gender equity and proportionality must be examined. The author will show this current state by first citing statistics of the numbers of athletic programs present in NCAA colleges, then show the compliance levels present in the state of Indiana as a guide to predicting the future.

Nationally, certain men's sports are suffering drastic reduction in number due to the presence of Title IX. For example, in 1996, the NCAA counted only 27 major college men's gymnastics programs, less than half of the 59 present in 1982. Over the last fifteen years, men's swimming has seen a drop of 27 programs nationwide, the number dropping each of the last four years. In wrestling, 146 programs were present in 1982; today, there are just 98, and 11 programs dropped in the past three years.⁴³ The major problem sport, from a Title IX compliance standpoint, is football. With 85 scholarships, which has been called the bare minimum by some coaches, the sport involved the number of students involved in several women's sports. Therefore, to meet complete statistical compliance, a school has three options: drop football (which generally will not occur), drop several men's sports to create substantive proportionality (which is happening around the country), or add many women's sports to balance the opportunities (which is happening, to a degree, around the country). This choice can prove to be very difficult for many schools.⁴⁴

The state of Indiana can be used as a numerical testing ground to further determine these trends in the future. In Indiana, 17 colleges responded to a survey by the Women's Sports Foundation concerning gender equity, which then gave grades for compliance. The grading scale was set up as follows: an A signaled compliance through a 10 percent below

proportionality standard for the genders, a B signaled 10-14 percent below the standard, and B- signaled 15-19 percent below the standard, a C+ 20-24 percent below standards, and a C signaled 25-29 percent below the standard.⁴⁵ Only one school, Rose-Hulman, which only became coeducational two years ago, received a grade of A. The B rating, which could be challenged by any potentially reduced women's athletics programs for Title IX violations, was received by three schools, Purdue, IP-Fort Wayne, and Saint Joseph's. Ball State, Butler, Earlham, Evansville, Indiana, Indiana State, Notre Dame, and Valparaiso received the B- rating. Anderson, Franklin, Indianapolis, and Hanover each received the C+ rating, while IUPUI scored a C. DePauw, Manchester, Oakland City, and Southern Indiana did not respond to the survey.⁴⁶

Conclusions

The survey described above helps predict the future of athletics across the nation. Clearly, with only a very small minority of schools in compliance with gender equity proportionality standards described by the Court as a benchmark, women's athletics programs that are currently in place will remain so, and even grow in terms of the number of scholarships available for each sport. Simply put, a school's dropping of a sport submits that school to a potential lawsuit. As shown above, the Court has not looked kindly on schools that violate gender equity issues; in fact, the majority of the time a school violating proportionality will be found guilty of Title IX violations by dropping a women's sport. Over time, expect the number of women's sports to grow to counteract this proportionality even further. As for men's sports, the money making sports of football and basketball are clearly safe, though they face dwindling numbers, because they provide the revenue to pay for the gender equity compliance steps. The so-called minor revenue sports, track, golf, gymnastics, wrestling, and soccer to name a few, are in major trouble on a nationwide basis. Expect reductions, significant in some sports, to take place over the next few years in these sports and the growth of each to be minimal at best.

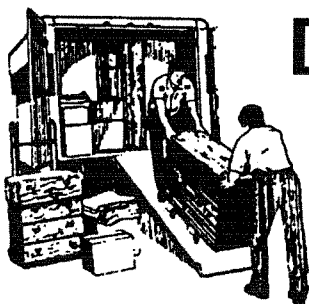
Clearly, we are at a crossroads in the world

of sport on the collegiate campus today. The world of tomorrow will be paved by the female gender, as opportunities for women will continue to grow and expand into the twenty-first century. Men's athletics, at least in their current numbers, may soon be impossible, with notable exceptions. Therefore, a changing scene will be striking athletics on a nationwide scale. For women, the situation is wonderful; for men, troubles lay ahead.

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