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ADMINISTRATIVE CLASS COMPLAINT

COMPLAINANT

Champion Women

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RECIPIENT

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I. PRELIMINARY STATEMENT

1. This complaint is filed by *Champion Women*, pursuant to Title IX of the Education Amendments of 1972, 20 U.S.C. § 1681 *et seq.* (“Title IX”) and the regulations and policies promulgated thereunder. *See* 34 C.F.R. § 106 *et seq.* Title IX prohibits discrimination on the basis of sex in federally funded education programs and activities, including athletics.

2. *Champion Women* is a 501(c)(3) that provides legal advocacy for girls and women in sports.

3. As detailed in the Factual and Legal Allegations below, data submitted by Northwestern State University of Louisiana (“Northwestern State Louisiana”) to the Office of Postsecondary Education of the U.S. Department of Education pursuant to the Equity in Athletics Disclosure Act (“EADA”), 20 U.S.C. § 1092, as well as information collected from Northwestern State Louisiana’s website indicates that Northwestern State Louisiana is discriminating on the basis of sex by providing women with unequal athletic participation opportunities, unequal athletic scholarship dollars, and unequal treatment and benefits, including athletic recruitment funding.

4. In order to address these disparities, *Champion Women* requests that the Office for Civil Rights (“OCR”) investigate Northwestern State Louisiana to determine whether it is providing women equal opportunities to participate in varsity sports, equal scholarship allocation and equivalent recruitment funding as required by Title IX and, if not, to remedy any unlawful conduct.

II. JURISDICTION

5. The OCR is responsible for ensuring compliance with Title IX and receiving information about, investigating, and remediating violations of Title IX and its implementing regulations and guidelines. 34 C.F.R. §§ 106.71, 100.7.

6. *Champion Women* has not filed this complaint with any other agency or institution.

7. As Northwestern State Louisiana currently violates Title IX’s athletic equity requirements, this complaint is timely.

III. FACTUAL ALLEGATIONS

8. Northwestern State Louisiana receives federal financial assistance and is therefore prohibited from discriminating on the basis of sex pursuant to Title IX.

9. Data submitted by Northwestern State Louisiana to the U.S. Department of Education pursuant to the EADA that is publicly available on the Office of Postsecondary Education website for academic years 2003-04 through 2021-2022 indicates that Northwestern State Louisiana is not currently and has not in the past been providing female athletes equal opportunities to participate in athletics under Title IX's three-part participation test.

Year	Undergraduate Enrollment				Men	Women Prong 2: This # should Rise Continuously and Steadily Over Time, Without Going Backwards	Athletic Participation			
	Men	Women	Total	Percent Women			Total	Percent Women	Female Athletes Who Would Need to be Added to Achieve	
2003-04	2674	4294	6968	61.62%	244	146	390	37.44%	246	
2004-05	2636	4314	6950	62.07%	273	158	431	36.66%	289	
2005-06	2397	4063	6460	62.89%	273	149	422	35.31%	314	
2006-07	1963	3422	5385	63.55%	247	153	400	38.25%	278	
2007-08	1901	3224	5125	62.91%	235	150	385	38.96%	249	
2008-09	1943	3505	5448	64.34%	250	151	401	37.66%	300	
2009-10	1950	3439	5389	63.82%	262	159	421	37.77%	303	
2010-11	1871	3434	5305	64.73%	270	172	442	38.91%	324	
2011-12	1825	3486	5311	65.64%	278	173	451	38.36%	358	
2012-13	1868	3411	5279	64.61%	268	176	444	39.64%	313	
2013-14	1759	3231	4990	64.75%	253	151	404	37.38%	314	
2014-15	1720	3172	4892	64.84%	260	167	427	39.11%	312	
2015-16	1738	3278	5016	65.35%	281	151	432	34.95%	379	
2016-17	1736	3446	5182	66.50%	270	171	441	38.78%	365	
2017-18	1798	3598	5396	66.68%	284	193	477	40.46%	375	
2018-19	1933	4249	6182	68.73%	290	195	485	40.21%	442	
2019-20	1844	4352	6196	70.24%	282	181	463	39.09%	485	
2020-21	1775	4181	5956	70.20%	246	168	414	40.58%	411	
2021-22	1638	3840	5478	70.10%	279	152	431	35.27%	502	

10. *Champion Women* has edited the EADA data on our website in just one instance <https://titleixschools.com/> : to remove male practice players who are counted up in the tally as

“women”. These male practice players are not female athletes and have therefore been subtracted from the totals in the EADA.¹

11. Northwestern State Louisiana does not and has not provided athletic opportunities to female students in numbers substantially proportionate to their enrollment pursuant to part one of the Title IX participation test. Women are 70.1% of the student body, but just 35.27% of the student athletes.

12. In 2021-2022, the most recent academic year for which EADA data is available that is not corrupted by disruptions related to Covid-19, Northwestern State Louisiana’s participation gap was 502 female athletes. In other words, Northwestern State Louisiana must add 502 additional athletic opportunities for women in order to provide athletic opportunities substantially proportionate to enrollment; 502 additional opportunities is more than enough for two or three new athletic departments; currently, Northwestern State Louisiana only has 120 women athletes. If the average squad size is 25 athletes – some more and some less – Northwestern State Louisiana would need to add 20 new women’s teams.

13. The EADA data and evidence gathered on Northwestern State Louisiana’s website show that Northwestern State Louisiana does not have a history and continuing practice of expanding athletic participation opportunities for women pursuant to Prong 2 of the Title IX participation test. The number of women athletes does not consistently increase over time.

14. Over the 19 academic years covered by the available EADA data, Northwestern State Louisiana achieved a total net gain of only 6 women’s athletic opportunities. Meanwhile, the gap between the opportunities Northwestern State Louisiana sponsors for men and women has doubled from 246 to 502. *Champion Women* cannot know the 28-year history of adding sports between 1975 and 2003, but Nazareth cannot show a history of continuous program expansion that is demonstratively responsive to women’s growing interest in sports of all kinds. *Champion Women* cannot know the 28-year history of adding sports between 1975 and 2003, but Northwestern State Louisiana cannot show a history of continuous program expansion that is demonstratively responsive to women’s growing interest in sports of all kinds.

15. A review of Northwestern State Louisiana’s website did not cover any policy or procedure for adding new sports or elevating existing club sports to varsity status. Nor did it reveal any athletic gender equity plan, or any gender equity committee.

16. Northwestern State Louisiana sponsors 5 men’s varsity sports (Baseball, Basketball, Track, Football) for 235 men, and 6 women’s varsity sports (Basketball, Track, Soccer, Softball, Tennis, and Volleyball) and 120 women.

¹ See *Champion Women* website for every college and university receiving federal funds: <https://titleixschools.com/2023/05/20/eada-data/> High school data for these schools receiving federal funds is available here: <https://titleixschools.com/2023/06/06/check-your-high-school/>

17. Information available on Northwestern State Louisiana’s website suggests that the university is not accommodating the interests and abilities of female athletes as required by part three of the Title IX participation test. Moreover, when we visited their website, Northwestern State Louisiana only hosted photos of men. <https://nsudemons.com/index.aspx>

18. Northwestern State Louisiana women participate in the club sports of archery, rowing, badminton, powerlifting and tennis, *WRAC Club Sports*, Northwestern State University of Louisiana, 2023 (last visited March 10, 2023). The existence of these women’s club teams indicates that there is unmet interest in women’s athletics at Northwestern State Louisiana. In addition, Northwestern State Louisiana has an Olympic-size pool.

19. Northwestern State Louisiana is a member of the Southland Conference. Members hail from Texas and Louisiana with associate members in Georgia, Idaho, Rhode Island, South Carolina, California, and New Jersey. This expansive competitive geographical area will give Northwestern State Louisiana many choices in teams for women.

20. Southland Conference currently sponsors Championship women’s Beach Volleyball, Bowling, and Golf. The existence of these Championship teams demonstrates that interest and competition exist in the geographic area from which Northwestern State Louisiana draws its students and with whom it competes to sustain additional varsity sports.

21. High school-age girls in the competitive geographic region compete in both school and club sports. These sports include Wrestling, Badminton, Table Tennis, Team Handball, Sailing, Field Hockey, Fencing, Swimming & Diving, Skateboarding, Water Polo, Archery, Field Hockey, Rifle, Triathlon, Ice Hockey, Sport Climbing, Artistic Swimming, Skiing, Snowboarding, Gymnastics, Rowing, Wrestling, Rugby, and all sorts of combat sports, like Judo, Karate, and Taekwondo, to name a few. Northwestern State University of Louisiana does not sponsor any of these sports, despite these girls expressing interest and ability in these sports.

22. Sport Governing Bodies and the NCAA, for member schools, make it very easy to see where other competitors are located. The NCAA publishes the “NCAA Sports Sponsorship and Participation Rates Report, 1956 - 2022” for schools to find competitors within the school’s normal competitive region: NCAA Sports Sponsorship and Participation Rates Report.²

² See

https://ncaaorg.s3.amazonaws.com/research/sportpart/2022RES_SportsSponsorshipParticipationRatesReport.pdf

See individual sports’ governing bodies for more, e.g.,

Women’s College Rugby: <https://www.urugby.com/teams/womens-teams>

Collegiate Equestrian: <https://collegiateequestrian.com/sports/2020/5/6/schools.aspx>

Women’s Collegiate Wrestling: <https://wrestlelikeagirl.org/college-opportunities>

Collegiate Competitive Cheer Teams: <https://www.ncsasports.org/cheerleading/colleges> (not to be confused with sideline cheerleading)

Women’s Collegiate Triathlon: <https://www.usatriathlon.org/multisport/ncaa-triathlon>

23. A review of the Northwestern State Louisiana website does not reveal that Northwestern State Louisiana undertook any athletic interest surveys or other research into interest and competition to support the addition of women's varsity sports. While surveys are never sufficient to deny women sports opportunities, they are often helpful in determining *which sports* the school should add.

24. Rugby, Equestrian, Triathlon, Competitive Cheer are NCAA emerging sports. There are 163 college women's Wrestling programs, 42 NCAA schools sponsor Triathlon, 26 colleges sponsor women's varsity Equestrian, and at least 32 colleges currently sponsor women's varsity Rugby.

25. The failure to provide women with equal opportunities to play impacts the availability of athletic scholarship dollars for women. These are important sources of funding for educational attainment that women are being denied because of their sex. If Northwestern State Louisiana provided its male and female students with the same opportunities to participate, Northwestern State Louisiana would need to add **\$4,887,910** additional athletic scholarship dollars, to balance out the amount Northwestern State Louisiana provides to its male students.

26. If, for some reason, the OCR determined that Northwestern State Louisiana was providing women with enough athletic opportunities, and the ratio used is the student-athletes, instead of the student body, no more scholarship dollars would be required.

27. Northwestern State Louisiana's EADA data further indicates that the university provides inadequate and unequal funding for the recruitment of female athletes. In 2021-2022, Northwestern State Louisiana spent \$198,595 on men's recruitment and only \$36,519 on women's recruitment; women were allocated only 15.53 percent of the recruiting budget even though they account for 35.27 percent of the athletic population and 70.10 percent of the full-time undergraduate population. Northwestern State Louisiana needs to give women's teams an additional **\$429,051.70** in recruiting funds, based on enrollment.

28. If, for some reason, the OCR determined that Northwestern State Louisiana is, in fact, not discriminating against women in providing opportunities in sport, Northwestern State

Collegiate Sailing is governed by the Inter-Collegiate Sailing Association (ICSA) with 220 schools:
<https://www.collegesailing.org/about/overview>

Women's Collegiate Ice Hockey: <https://www.uscho.com/teams/#d1women>

Collegiate Field Hockey: <https://www.teamusa.org/USA-Field-Hockey/PLAYERS/College/Team-Websites>

Collegiate Synchronized/ Artistic Swimming: <https://www.collegexpress.com/lists/list/colleges-with-notable-synchronized-swimming-teams/581/>

Collegiate Bowling - <https://collegebowling.bowl.com/teams>

Collegiate Rifle - <https://competitions.nra.org/competitions/nra-national-matches/collegiate-championships/collegiate-shooting-sports-directory/>

Collegiate Skiing - <https://www.uscsa.org/>

Collegiate Water Polo - <https://collegiatewaterpolo.org/>

Collegiate Women's Gymnastics <https://www.ncaa.com/sports/gymnastics-women>

Louisiana would still need to provide its women's sports teams – and women's coaches – with **\$43,180.66** more recruiting dollars in order to be consistent with the school's investment in men's sports.

IV. LEGAL ALLEGATIONS

29. Title IX provides that “[n]o person in the United States shall, on the basis of sex, be excluded from participation in, be denied the benefits of or be subjected to discrimination under any education program or activity receiving Federal financial assistance.” 20 U.S.C. §1681(a).

30. Title IX regulations prohibit athletic programs from discriminating on the basis of sex in interscholastic, intercollegiate, club or intramural athletics offered by the institution. 34 C.F.R. §106.41(a) (2000).

31. Title IX regulations require institutions that offer athletics programs to provide equal athletic opportunities to members of both sexes to participate in athletics. 34 C.F.R. §106.41(c)(1).

32. Pursuant to the 1979 Title IX Policy Interpretation, compliance with Title IX's equal athletic participation requirement is measured by determining whether the educational institution meets one part of the following three-part test:

1. Prong 1: Whether intercollegiate level participation opportunities for male and female students are provided in numbers substantially proportionate to their respective enrollments; or
2. Prong 2: Where the members of one sex have been and are underrepresented among intercollegiate athletes, whether the institution can 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. Prong 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, whether it can be demonstrated that the interests and abilities of the members of that sex have been fully and effectively accommodated by the present program.

United States Department of Health, Education, and Welfare, Office for Civil Rights, *Policy Interpretation; Title IX and Intercollegiate Athletics*, 44 Fed. Reg. 71413 (Dec. 11, 1979) [hereinafter *Policy Interpretation*].

33. In determining substantial proportionality under part one of the three-part test, OCR considers the number of opportunities that would have to be added to achieve proportionality and whether it would be sufficient to support another team. If there are a significant number of unaccommodated women, it is likely that a viable sport could be added and therefore the institution has not satisfied part one of the three-part test. United States Department of Education, Office for Civil Rights, *Clarification of Intercollegiate Athletics Policy Guidance: the Three-Part Test* (Jan. 16, 1996) [hereinafter *1996 Clarification*].

34. In 1975, schools were given three years to be in compliance with the equal participation mandate under Title IX. Schools had only one year to end sex-discrimination in all other areas of Title IX's non-discrimination mandate. Only athletics gave schools three years to add athletic opportunities and to stop discriminating against women – or until 1978. That deadline passed 45 years ago. 34 C.F.R. §106.41(d).³

It is worth noting how odd Prong 2 is as a legal test, in comparison to other non-discrimination civil rights. For a school to be able to argue that it is still playing catch-up with non-discrimination – exists nowhere else in law. This is especially true 51 years after the passage of Title IX, and 48 years after the passage of the regulations OCR depends on, regulations that were passed by Congress. When a school uses Prong 2, it is admitting that it is not providing women with equal educational opportunities, but that their actions are acceptable, because the school is “improving.” Title IX's Prong 2 allows schools to provide girls and women with less.

35. Therefore, it is understandable that Prong 2 is a strict legal test. In determining whether an institution has a history and continuing practice of expansion under Prong 2 of the three-part test, OCR reviews the entire history of the athletic program and evaluates whether the institution has expanded participation opportunities for the underrepresented sex in a manner that was demonstrably responsive to their developing interests and abilities, considering a number of factors, including:

- an institution's record of adding intercollegiate teams, or upgrading teams to intercollegiate status, for the underrepresented sex;
- an institution's record of increasing the numbers of participants in intercollegiate athletics who are members of the underrepresented sex;
- an institution's affirmative responses to requests by students or others for addition or elevation of sports; and
- whether the institution has effective ongoing procedures for collecting, maintaining and analyzing information on the interest and abilities of students of the underrepresented sex, including monitoring athletic participation, and assessing interest and ability on a periodic basis.

³ 34 C.F.R. §106.41(d) “*Adjustment period.* A recipient which operates or sponsors interscholastic, intercollegiate, club or intramural athletics at the elementary school level shall comply fully with this section as expeditiously as possible but in no event later than one year from the effective date of this regulation. A recipient which operates or sponsors interscholastic, intercollegiate, club or intramural athletics at the secondary or post-secondary school level shall comply fully with this section as expeditiously as possible but in no event later than three years from the effective date of this regulation.”

United States Department of Education, Office for Civil Rights, *Intercollegiate Athletics Policy Clarification: The Three-Part Test- Part Three* (Apr. 20, 2010) [hereinafter *2010 Clarification*]; *1996 Clarification*.

36. In determining whether an institution has a continuing practice of program expansion under Prong 2, OCR will consider a number of factors, including:

- an institution’s current implementation of a nondiscriminatory policy or procedure for requesting the addition of sports (including the elevation of club or intramural teams) and the effective communication of the policy or procedure to students;
- an institution’s current implementation of a plan of program expansion that is responsive to developing interests and abilities; and
- an institution’s efforts to monitor developing interests and abilities of the underrepresented sex, for example, by conducting periodic nondiscriminatory assessments of developing interests and abilities and taking timely actions in response to the results.

2010 Clarification, 1996 Clarification.

37. OCR will not find a history and continuing practice of program expansion where an institution increases the proportional participation opportunities for the underrepresented sex by reducing opportunities for the overrepresented sex alone or by reducing participation opportunities for the overrepresented sex to a proportionately greater degree than for the underrepresented sex. *2010 Clarification, 1996 Clarification.*

38. Courts have found that schools must have both a history *and* continuing practice of expanding opportunities for women for Prong 2 compliance. *Mansourian v. Bd. Of Regents of Univ. of Cal.*, 594 F. 3d 1095, 1108. (9th Cir. Cal. 2010).

39. Prong 3 of the three-part test requires an examination of whether there is an unmet interest in a particular sport, a sufficient ability to sustain a team in the sport, and a reasonable expectation for competition for a team in the sport. *2010 Clarification, 1996 Clarification.*

40. Whether there is unmet interest and ability will be determined by examining a broad range of indicators, including whether the institution uses non-discriminatory methods of assessing interest and ability, the elimination of a viable team for the unrepresented sex, multiple indicators of interest and ability, and frequency of conducting assessments. *2010 Clarification.*

41. Sufficient interest can be established by student requests to add a sport or elevate a club sport, increases in club or intramural sport participation, responses to interviews and interest surveys, assessments of student athletic participation before entering the institution or in the secondary schools from which the university draws its students, and assessments of participation in intercollegiate sports in the institution’s normal competitive regions. *Id.*

42. Ability may be established by the athletic accomplishments and competitive experience of club sports and admitted students, the opinions of coaches, administrators, and athletes, and student participation in other sports. *Id.*

43. Expectation of competition may be established through athletic opportunities offered by other schools with which the school competes or opportunities at other schools in the school's geographic area, including those against which the institution does not compete. *Id.*

44. Under Prong 3 of the three-part test, OCR will also examine an institution's recruitment practices. If an institution recruits potential student-athletes for its men's teams, OCR will examine whether the institution is providing women's teams with substantially equal opportunities to recruit potential student athletes. *Id.*

45. Title IX also requires schools to provide equal scholarship dollars, in proportion to the number of students of each sex participating in athletics. 34 C.F.R. §106.37(c) (2000). NCAA limits on scholarships per team is not a legal defense; schools cannot blame a third-party; recipients are responsible for equality. Schools choose which sports to sponsor, and some schools have chosen scholarship-dense sports for men, like football, and scholarship-light sports for women, like track.

46. Title IX also requires equal opportunity in the recruitment of student-athletes where equal athletic opportunities are not present for male and female students. Compliance will be assessed by examining the recruitment practices of the athletic programs for both sexes and evaluating whether the financial and other resources made available for recruitment in male and female athletic programs are equivalently adequate to meet the needs of each program. *1979 Policy Interpretation.*

47. Title IX requires schools to provide women with equal treatment, including equipment and supplies; game and practice times; travel and per diem allowances; coaching and academic tutoring; assignment and compensation of coaches and tutors; locker rooms, practice and competitive facilities; medical and training facilities and services; housing and dining facilities and services; and publicity. 34 C.F.R. §106.41(a) (2000), *Policy Interpretation.*

48. Lack of money is not a legal defense to sex discrimination. *See, e.g., Roberts Colorado State Univ.*, 814 F. Supp. 1507, 1518 (D. Colo. 1993) (“[A] financial crisis cannot justify gender discrimination.”); *Favia v Indiana University of Pennsylvania*, 812 F. Supp. 578, 585 (W.D. Pa. 1993) (finding that financial concerns alone cannot justify gender discrimination); *Cook v. Colgate University*, 802 F. Supp. 737, 750 (1992) (“[I]f schools could use financial concerns as a sole reason for the disparity of treatment, Title IX would become meaningless.”); *Haffer v. Temple*, 678 F. Supp. 517, 520 (1987) (finding that financial concerns alone cannot justify gender discrimination).

49. Monies from third-party sources, such as donors, sponsorships, television rights, ticket sales, and student fees, are not a defense to a sex discrimination charge, whether than money was used to build facilities, fund scholarships, or any of the other benefits of sports

participation. None of those sources of money creates a legal defense against sex discrimination. Schools cannot discriminate against their students based on sex. See 20 U.S.C. § 1687 (2005); See Office for Civil Rights, *Department of Education, Further Clarification of Intercollegiate Athletics Policy Guidance Regarding Title IX Compliance* (June 11, 2003), *Cohen v. Brown Univ.*, 809 F. Supp. 978, 996 (D.R.I. 1992) (concluding that “all monies spent by Brown’s Athletic Department, whether originating from university coffers or from the Sports Foundation [booster club] must be evaluated as a whole under § 106.41(c)”).

50. It is *Champion Women’s* experience that most athletes and former athletes are acutely aware of all the ways they are treated as second-class within their athletics department, because they are women. As NIL monies become more available, equal promotion and publicity will be important for female athletes. *Champion Women* asked current collegiate athletes what equality would look like under this list. Here’s what the athletes came up with:

- i. Men’s and Women’s sports would be equally featured, with equal prominence, on school and Athletic Department websites and social media.
- ii. Schools would invest equally in cameras and production equipment for Women’s and Men’s sports.
- iii. Schools would optimize Google searches for their Men’s and Women’s teams to receive equal search results.
- iv. Women’s and Men’s sports would employ an equal caliber of talent in their sports information and marketing departments, and they would be paid and promoted equally.
- v. Women’s and Men’s sports jerseys, apparel, and memorabilia would be equally and easily accessible.
- vi. The needs of Women’s teams would not revolve around Men’s football and men’s basketball teams.
- vii. The Women’s and Men’s teams would have equal access to dining halls, nutrition, etc. at times equally convenient to both teams.
- viii. Men’s and Women’s teams would have equal access to optimal practice times when they share facilities.
- ix. Men’s and Women’s sports marketing efforts would focus on performance; Broadcasters and schools would not focus on a woman athlete’s appearance or sexuality.
- x. Women’s and Men’s medical care and athletic training access would be equal; Neither male nor female athletes would have priority accessing these resources.
- xi. Schools would hire competition officials of the same quality, with equal compensation, for the Women’s and Men’s teams.
- xii. Men’s and Women’s sports performance staff would be equal and would be paid and promoted comparably.
- xiii. Schools would intentionally use language that equally prioritizes Men’s and Women’s sports.

1. Teams would be referred to as “Women’s Basketball” and “Men’s Basketball.”
2. “Basketball” would not be used to refer to Men’s Basketball.
3. Schools would have Social Media handles that referred to men’s and women’s teams; “Oregon Soccer” would be changed to “Oregon Men’s Soccer.”

51. Northwestern State Louisiana’s own data, as outlined in the Factual Allegations above, demonstrate that it is not providing equal opportunities for its female students to participate in sports under Title IX’s three-part participation test, in addition to scholarship, treatment and recruitment requirements.

V. RELIEF REQUESTED

52. *Champion Women* requests that OCR:

- a. Investigate Northwestern State University of Louisiana to determine whether it is discriminating against women; whether it is providing female students with equal participation opportunities in varsity athletics, equal and proportionate athletic scholarship dollars, equal treatment and benefits, including equal recruiting budgets.
- b. Take all necessary steps to remedy any and all unlawful conduct that you identify in your investigation, as required by Title IX and its implementing regulations.
- c. If any violations are found, secure assurances of compliance with non-discrimination and Title IX from Northwestern State Louisiana, that include full remedies for the violations identified.
- d. Among other steps to achieve compliance with Title IX, require Northwestern State Louisiana to add more athletic opportunities for women, accord to additional teams and athletes the full range of benefits accorded to men's varsity teams and athletes, increase scholarship and recruiting budgets and opportunities, and adopt and implement a plan to achieve full compliance with Title IX throughout the entire athletic department.
- e. Monitor any resulting agreement with Northwestern State University of Louisiana to ensure that the school achieves full and complete compliance with Title IX throughout its athletic department.
- a. I give OCR my consent to disclose my name and Champion Women's name contained in this letter to others for OCR's investigation of, and enforcement activities related to, the Discrimination Complaint.



Handwritten signature of Nancy Hogshead in blue ink.

Nancy Hogshead, J.D., OLY
September 5, 2023