



**U.S. Department of Education
Office for Civil Rights**

Dr. Miguel Cardona
Secretary of Education, Office for Civil Rights
U.S. Department of Education
400 Maryland Avenue, SW
Washington, DC 20202
Phone (202) 401 – 3000
ocr@ed.gov

Catherine Lhamon, J.D.
Ass't Secretary, Office for Civil Rights
U.S. Department of Education
400 Maryland Avenue, SW
Washington, D.C. 20202 - 1100
Catherine.lhamon@ed.gov

Suzanne B. Goldberg, J.D.
Acting Ass't Secretary, Office for Civil Rights
U.S. Department of Education
400 Maryland Avenue, SW
Washington, DC 20202 - 1100
Suzanne.goldberg@ed.gov

ADMINISTRATIVE CLASS COMPLAINT

COMPLAINANT

Champion Women
Nancy Hogshead, J.D., OLY, CEO
EMAIL: Hogshead@ChampionWomen.org

RECIPIENT

Saginaw Valley State University
Angela Pohl, Director of Athletics
7400 Bay Road
University Center, MI 48710
EMAIL: aspohl@svsu.edu

George Grant Jr., President
Wickes 349, 7400 Bay Road
University Center, MI 48710
EMAIL: presidentsoffice@svsu.edu

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 Saginaw Valley State University (“Saginaw Valley”) 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 Saginaw Valley’s website indicate that Saginaw Valley 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 Saginaw Valley to determine whether it is providing women equal opportunities to participate in varsity sports, equal opportunities to earn athletic scholarships, and equivalent treatment and benefits, including 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 Saginaw Valley currently violates Title IX’s athletic equity requirements, this complaint is timely.

III. FACTUAL ALLEGATIONS

8. Saginaw Valley receives federal financial assistance and is therefore prohibited from discriminating on the basis of sex pursuant to Title IX. It competes in NCAA Division II.

9. Data submitted by Saginaw Valley to the U.S. Department of Education pursuant to the EADA that are publicly available on the Office of Postsecondary Education website for academic years 2003-04 through 2021-2022 indicate that Saginaw Valley 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	2186	3324	5510	60.33%	303	115	418	27.51%	346	
2004-05	2331	3503	5834	60.04%	292	113	405	27.90%	326	
2005-06	2420	3625	6045	59.97%	435	192	627	30.62%	460	
2006-07	2952	4356	7308	59.61%	373	198	571	34.68%	352	
2007-08	2598	3728	6326	58.93%	392	194	586	33.11%	369	
2008-09	2783	3857	6640	58.09%	448	225	673	33.43%	396	
2009-10	3079	4197	7276	57.68%	396	207	603	34.33%	333	
2010-11	3176	4336	7512	57.72%	431	194	625	31.04%	394	
2011-12	3262	4414	7676	57.50%	432	205	637	32.18%	380	
2012-13	3256	4383	7639	57.38%	363	187	550	34.00%	302	
2013-14	3132	4276	7408	57.72%	373	202	575	35.13%	307	
2014-15	2982	4219	7201	58.59%	432	239	671	35.62%	372	
2015-16	3041	4139	7180	57.65%	415	196	611	32.08%	369	
2016-17	2779	3971	6750	58.83%	422	231	653	35.38%	372	
2017-18	2580	3813	6393	59.64%	392	211	603	34.99%	368	
2018-19	2501	3824	6325	60.46%	418	255	673	37.89%	384	
2019-20	2371	3837	6208	61.81%	355	233	588	39.63%	341	
2020-21	2118	3812	5930	64.28%	230	227	457	49.67%	187	
2021-22	1953	3654	5607	65.17%	423	246	669	36.77%	545	

10. *Champion Women* has edited the EADA data on our website <https://titleixschools.com/> in just one instance: 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

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/>

11. Saginaw Valley 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 65.17% of the student body, but just 36.77% of the student-athletes.

12. In 2021-2022, the most recent academic year for which EADA data are available that is not corrupted by disruptions related to Covid-19, Saginaw Valley's participation gap was 545 athletes. In other words, Saginaw Valley must add 545 additional athletic opportunities for women in order to provide athletic opportunities substantially proportionate to enrollment. To put this number in perspective, if each women's team has an average roster of 25 athletes – some more and some less – Saginaw Valley will need to add almost 22 new teams for women.

13. The EADA data and evidence gathered on Saginaw Valley's website show that Saginaw Valley 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, Saginaw Valley backslid in its athletic opportunities for women many times. In 2009, Saginaw Valley lost 18 women athletes, and the next year it lost another 13 women's opportunities. Saginaw Valley did not achieve its 2009 numbers until 2014, when the school promptly backslid for another three years. Saginaw Valley had 9 more women athletes back in 2018. *Champion Women* cannot know the 28-year history of adding sports between 1975 and 2003, but Saginaw Valley 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 Saginaw Valley's website did not cover any policy or procedure for adding new sports or elevating existing club sports to varsity status. Although there is mention of gender equity within the Saginaw Valley Strategic Goals from 2016-2020 "Goal 4 - Saginaw Valley Athletics upholds a culture of integrity, gender equity and diversity by progressive leadership and collaboration with stakeholders" (*Saginaw Valley Athletics Strategic Plan – 2016-2020*, Saginaw Valley, last viewed February 9, 2023). There are no documents reflecting current gender equity plans or gender equity committees.

16. Saginaw Valley sponsors 8 men's varsity sports (Baseball, Basketball, Cross Country, Football, Golf, Soccer, Swimming & Diving, and Track) for 321 men, and 9 women's varsity sports (Basketball, Cross Country, Golf, Soccer, Softball, Swimming & Diving, Tennis, Track, and Volleyball) for 176 women.

17. Information available on Saginaw Valley'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. Saginaw Valley Strategic Planning documents suggest a review of an interest survey (2018) without reporting results nor actions.

18. Saginaw Valley women participate in the club sports of basketball, bowling, cheer, dance, dodgeball, equestrian, golf, ice hockey, lacrosse, rugby, ultimate Frisbee, running, volleyball and sailing (*Saginaw Valley Campus Recreation*, Saginaw Valley, last visited August 2023). The existence of these women's club teams indicates that there is unmet interest in women's athletics at Saginaw Valley.

19. Saginaw Valley is a member of the Great Lakes Intercollegiate Athletic Conference (GLIAC). Members are in Michigan, Indiana and Wisconsin. Affiliate members are in Illinois, South Dakota, and Minnesota. This is an enormous geographic region that will certainly have collegiate sports throughout the area.

20. GLIAC sponsors Lacrosse as a Championship sport, while Saginaw Valley does not sponsor Lacrosse. Championship teams are a unique educational experience. Their existence demonstrates women's interest in these sports and their athletic ability to compete. They also demonstrate that competition for these women's sports exists in Saginaw Valley's competitive geographic area.

21. Members of GLIAC also sponsor teams for women in Bowling, Wrestling, Fencing, and Skiing. Saginaw Valley State does not participate in any of these four sports. The existence of these four new sports demonstrates women's interest and athletic ability to play, and a reasonable expectation within Saginaw Valley's competitive geographic region.

22. Additional sports that currently exist within Saginaw Valley's normal competitive geographic area include Fencing, Field Hockey, Gymnastics, Ice Hockey, Rifle, Rowing, Beach Volleyball, and Skiing.

22. High school-age girls in the competitive geographic region compete in both school and club sports. In addition to the sports Saginaw Valley offers its students, high school students compete in 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, Rugby, and all sorts of combat sports, like Judo, Karate, and Taekwondo, to name a few.

21. Rugby, Equestrian, Triathlon, and Wrestling 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.

23. 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.^{2s}

24. A review of the Saginaw Valley website does not reveal that Saginaw Valley 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.

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 Saginaw Valley provided its male and female students with the same opportunities to participate, Saginaw Valley would need to add **\$1,544,849.00** additional athletic scholarship dollars, to balance out the amount Saginaw Valley provides to its male students.

26. If, for some reason, the OCR determined that Saginaw was not discriminating against women in the number of opportunities to participate in sports, the ratio used is the student-athletes, instead of the student body, no more scholarship dollars would be required.

27. Saginaw Valley's EADA data further indicates that the university provides inadequate and unequal funding for the recruitment of female athletes. In 2021-2022, Saginaw Valley spent \$106,271.00 on men's recruitment and only \$23,008.00 on women's recruitment; women were allocated only 17.8 percent of the recruiting budget even though they account for 36.77 percent of the athletic population and 65.17 percent of the full-time undergraduate population. If Saginaw Valley provided its male and female students with the same opportunities to participate, Saginaw Valley would need to add **\$175,821** additional recruiting dollars, to balance out the amount Saginaw Valley provides to its male students.

28. If, for some reason, the OCR determines that Saginaw Valley is, in fact, not discriminating against women in providing opportunities in sport, Saginaw Valley would still need to provide its women's sports teams – and women's coaches – with **\$22,772.00** 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*].

33. 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).²

² 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.”

It is worth noting how odd Prong 2 is as a legal test, in comparison to any other non-discrimination civil right. 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, 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 conduct is acceptable because the school is “improving”. Title IX’s Prong 2 allows schools to provide girls and women with less than their male peers.

34. 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.

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*.

35. 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 non-discriminatory 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.

36. 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.*

37. 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).

38. 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.*

39. 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.*

40. 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.*

41. 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.*

42. 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.*

43. 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.*

44. 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 for sex discrimination; recipients are responsible for equality. Schools choose which sports to

sponsor, and some schools have chosen scholarship-dense sports for men, such as football and basketball, and scholarship-light sports for women, such as track.

45. 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*.

46. 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*.

47. 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 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).

48. Monies and in-kind benefits 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 those resources were used to build facilities, fund scholarships, provide equipment and uniforms, or any other benefit of sports participation. None of those sources of money creates a legal defense against sex discrimination. Schools must ensure that their students are not receiving second-class educational opportunities because they are female. 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)”)

49. 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."

50. Saginaw Valley'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

51. *Champion Women* requests that OCR:
- a. Investigate Saginaw Valley to determine whether it is providing female students with equal participation opportunities in athletics, equal and proportionate athletic scholarship dollars, and receiving equal treatment and benefits, including equal recruiting budgets.
 - b. Take all necessary steps to remedy any unlawful conduct that it identifies in its investigation, as required by Title IX and its implementing regulations. If any additional violations are found, secure assurances of compliance with Title IX from Saginaw Valley, that include full remedies for the violations found.
 - c. Among other steps to achieve compliance with Title IX, require Saginaw Valley 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, equalize benefits and treatment between men and women athletes, and adopt and implement a plan to achieve compliance with Title IX.
 - d. Monitor any resulting agreement with Saginaw Valley to ensure that the school achieves compliance with Title IX, now and in the future.

I give the 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.



Respectfully submitted,

Nancy Hogshead, J.D.
Date: September 5, 2023