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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 Saint Ambrose University (“Saint Ambrose”) 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 Saint Ambrose’s website indicates that Saint Ambrose 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 Saint Ambrose to determine whether it is discriminating against its women students in providing women equal opportunities to participate in varsity sports, providing equal athletic scholarships, 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 Saint Ambrose currently violates Title IX’s athletic equity requirements, this complaint is timely.

## **III. FACTUAL ALLEGATIONS**

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

9. Data submitted by Saint Ambrose 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 Saint Ambrose 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.

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.<sup>1</sup>

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	847	1136	1983	57.29%	324	166	490	33.88%	269
2004-05	904	1235	2139	57.74%	332	168	500	33.60%	286
2005-06	915	1285	2200	58.41%	353	165	518	31.85%	331
2006-07	929	1399	2328	60.09%	357	160	517	30.95%	378
2007-08	1006	1673	2679	62.45%	384	163	547	29.80%	476
2008-09	966	1455	2421	60.10%	438	182	620	29.35%	478
2009-10	992	1415	2407	58.79%	453	197	650	30.31%	449
2010-11	1015	1390	2405	57.80%	473	205	678	30.24%	443
2011-12	1007	1359	2366	57.44%	454	235	689	34.11%	378
2012-13	1039	1370	2409	56.87%	488	237	725	32.69%	406
2013-14	1043	1392	2435	57.17%	515	209	724	28.87%	478
2014-15	1048	1349	2397	56.28%	541	217	758	28.63%	479
2015-16	986	1230	2216	55.51%	486	198	684	28.95%	408
2016-17	950	1237	2187	56.56%	463	228	691	33.00%	375
2017-18	978	1227	2205	55.65%	473	301	774	38.89%	292
2018-19	971	1168	2139	54.60%	545	344	889	38.70%	312
2019-20	960	1161	2121	54.74%	616	349	965	36.17%	396
2020-21	955	1225	2180	56.19%	615	353	968	36.47%	436
2021-22	965	1156	2121	54.50%	678	408	1086	37.57%	404

<sup>1</sup> 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. Saint Ambrose 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 54.5% of the student body, but just 37.57% 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, Saint Ambrose's participation gap was 404 athletes. In other words, Saint Ambrose must add 404 additional athletic opportunities for women in order to provide athletic opportunities substantially proportionate to enrollment. To put this into perspective, assuming 25 athletes per team – some more and some less – Saint Ambrose will need to add about 16 new teams. 404 additional opportunities is enough to add almost an entire athletic department; Saint Ambrose currently only has 377 women athletes.

13. The EADA data and evidence gathered on Saint Ambrose's website show that Saint Ambrose 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. See column "Women" under "Athletic Participation" above. The number of women athletes does not consistently increase over time.

14. Over the 19 academic years covered by the available EADA data, Saint Ambrose's numbers of women's opportunities fluctuated, staying mostly stagnant during the first six years. In 2013, Saint Ambrose cut 18 women's opportunities. In 2015, Saint Ambrose cut 19 women's opportunities. By 2013-14, the total number of women athletes had actually decreased from 237 to 209. *Champion Women* cannot know the 28-year history of adding sports between 1975 and 2003, but Saint Ambrose 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 Saint Ambrose's website did not show 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. Saint Ambrose sponsors 13 men's varsity sports (Baseball, Basketball, Bowling, Football, Golf, Lacrosse, Soccer, Swimming & Diving, Tennis, Track & Field, Volleyball, and Wrestling) serving 552 men, and 12 women's varsity sports (Basketball, Bowling, Cheerleading, Dance, Golf, Lacrosse, Soccer, Softball, Swimming & Diving, Tennis, Track & Field and Volleyball) serving 377 women.

17. Saint Ambrose's Dance and Cheerleading may not qualify as a sport for Title IX purposes. Not because these activities do not require physical talent and training, but looking at the competitive schedules, Dance and Cheerleading teams only compete 3 or 4 days for the entire season, as opposed to all the other men's sports. The Dance and Cheerleading competitive schedules are identical. <https://www.saubees.com/landing/index>

18. Saint Ambrose is a member of the Heart of America Athletic Conference. Members hail from Iowa, Nebraska, Missouri and Kansas, a large geographic region. Affiliate members are in Missouri and North Dakota. In this geographic region, most every women's sport will be competing collegiately. Saint Ambrose will have many choices of new sports to start for women.

19. High school-age girls in this competitive geographic region, where Saint Ambrose recruits its students and athletes, compete in both school and club sports. Iowa high school girls compete in Basketball, Soccer, Track & Field, Soccer, Volleyball, Softball, Swimming & Diving, Weightlifting, and Wrestling. <https://www.nfhsnetwork.com/states/IA>

High school girls also participate in club-type sports, that will include Wrestling, Badminton, Table Tennis, Team Handball, Field Hockey, Fencing, Swimming & Diving, Equestrian, Skateboarding, Water Polo, Archery, 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.

20. Flag Football, Wrestling, Swimming and Diving and Beach Volleyball are NAIA emerging sports. There are 163 college women's Wrestling programs, and Saint Ambrose currently only sponsors Swimming in this list of sports.

21. A review of Saint Ambrose 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.

22. Saint Ambrose's EADA report is unusual. [Equity in Athletics \(ed.gov\)](#) It lists 55 men and 39 women on a co-ed sport that is unnamed, and 44 women in "other sports" without listing what that sport could be. When checked against Saint Ambrose's website, these athletes are presumably E-sports, Dance, Cheerleading, and possibly the band. <https://www.saubees.com/landing/headlines-featured> These activities are inconsistent with other varsity sports at Saint Ambrose and conference member schools, and while they may be worthwhile endeavors, they will probably not be considered "sports" for EADA or Title IX purposes.

22. 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 Saint Ambrose provided its male and female students with the same opportunities to participate, Saint Ambrose would need to add **\$1,648,820 additional** athletic scholarship dollars, to balance out the amount Saint Ambrose provides to its male students.

23. If, for some reason, the OCR determines that Saint Ambrose is, in fact, not discriminating against women in providing opportunities in sport, then Saint Ambrose would

still need to provide its women students participating in sports with **\$559,146** more in athletic scholarship aid, to match the amount Saint Ambrose provides its male athletes.

24. Saint Ambrose's EADA data further indicates that the university provides inadequate and unequal funding for recruitment of female athletes. In 2021-2022, Saint Ambrose spent \$63,450.00 on men's recruitment and only \$47,125 on women's recruitment; women were allocated only 37.82 percent of the recruiting budget even though they account for 37.57 percent of the athletic population and 54.5 percent of the full-time undergraduate population. Ambrose would need to add an *additional* **\$14,859** to support its women's team and women's coaches in recruiting.

25. If, for some reason, the OCR determines that Saint Ambrose is, in fact, not discriminating against women in providing opportunities in sport, Saint Ambrose would still need to provide its women's sports teams – and women's coaches – with **\$3,438** more recruiting dollars in order to be consistent with the school's investment in men's sports.

#### **IV. LEGAL ALLEGATIONS**

26. 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).

27. 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).

28. 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).

29. 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*].

30. 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*].

31. 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).<sup>2</sup>

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.

32. 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:

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<sup>2</sup> 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.”

- 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*.

33. 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 the 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.*

34. 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.*

35. 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. (9<sup>th</sup> Cir. Cal. 2010).



36. 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.*

37. 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.*

38. 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.*

39. 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.*

40. 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.*

41. 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.*

42. In determining whether certain sports "count" for Title IX purposes, the OCR will inquire "Whether the regular season competitive opportunities differ quantitatively and/or qualitatively from established varsity sports; whether the team competes against intercollegiate or interscholastic varsity opponents in a manner consistent with established varsity sports;" and "whether the primary purpose of the activity is to provide athletic competition at the intercollegiate or interscholastic varsity levels rather than to support or promote other athletic activities. When analyzing this factor, the following may be taken into consideration:

a. Whether the activity is governed by a specific set of rules of play adopted by a state, national, or conference organization and/or consistent with established varsity sports, which include objective, standardized criteria by which competition must be judged;

b. Whether resources for the activity (e.g., practice and competition schedules, coaching staff) are based on the competitive needs of the team;

c. If post-season competition opportunities are available, whether participation in post-season competition is dependent on or related to regular season results in a manner consistent with established varsity sports; and

d. Whether the selection of teams/participants is based on factors related primarily to athletic ability.

For more, please see *Letter from Stephanie Monroe, Assistant Sec'y for Civil Rights, Dear Colleague Letter: Athletic Activities Counted for Title IX Compliance*, (Sept. 17, 2008) (“2008 OCR Letter”) Available at: <http://www2.ed.gov/print/about/offices/list/ocr/letters/colleague-20080917.html>

43. 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). NAIA 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.

44. 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*.

45. 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*.

46. 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).

47. 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)”)

48. 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.”

49. Saint Ambrose’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 athletic scholarship, treatment and benefits.

## V. RELIEF REQUESTED

50. *Champion Women* expects OCR investigators will find additional violations of the law. *Champion Women* requests that OCR:

- a. Investigate Saint Ambrose to determine whether it is providing female students with equal participation opportunities in athletics, equal athletic scholarship dollars, and receiving equal treatment and benefits.
- b. Take all necessary steps to remedy any unlawful conduct that you identify in your investigation, as required by Title IX and its implementing regulations. If any violations are found, secure assurances of compliance with Title IX from Saint Ambrose, that include full remedies for the violations found.
- c. Among other steps to achieve compliance with Title IX, require Saint Ambrose 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 recruiting budgets and opportunities, and adopt and implement a plan to achieve compliance with Title IX.
- d. Monitor any resulting agreement with Saint Ambrose University to ensure that the school is not engaging in sex discrimination and that it is achieving 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.



A handwritten signature in blue ink that reads "Nancy Hogshead".

Nancy Hogshead, J.D., OLY  
September 17, 2023