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ADMINISTRATIVE CLASS COMPLAINT

COMPLAINANT

Champion Women

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RECIPIENT

University of Arizona

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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 University of Arizona (“Arizona”) 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 Arizona’s website indicates that Arizona is discriminating on the basis of sex by providing unequal athletic participation opportunities, unequal athletic scholarship dollars, and unequal benefits and treatment, including unequal athletic recruitment funding for its female students.

4. In order to address these disparities, *Champion Women* requests that the Office for Civil Rights (“OCR”) investigate Arizona to determine whether it is discriminating against women; whether it is providing women equal opportunities to participate in varsity sports, equal athletic scholarship opportunities, and equivalent benefits and treatment, 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 Arizona currently violates Title IX’s athletic equity requirements, this complaint is timely.

III. FACTUAL ALLEGATIONS

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

9. Data submitted by Arizona 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 Arizona 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.¹

Year	Undergraduate Enrollment				Athletic Participation				
	Men	Women	Total	Percent Women	Men	Women Prong 2: This # should Rise Continuously and Steadily Over Time, Without Going Backwards	Total	Percent Women	Female Athletes Who Would Need to be Added to Achieve
2003-04	11320	12897	24217	53.26%	240	185	425	43.53%	88
2004-05	11490	13105	24595	53.28%	256	235	491	47.86%	57
2005-06	11491	13234	24725	53.52%	263	226	489	46.22%	77
2006-07	13510	14932	28442	52.50%	259	231	490	47.14%	55
2007-08	11774	13304	25078	53.05%	263	246	509	48.33%	51
2008-09	12185	13629	25814	52.80%	260	210	470	44.68%	81
2009-10	12747	14242	26989	52.77%	273	245	518	47.30%	60
2010-11	12715	14138	26853	52.65%	265	222	487	45.59%	73
2011-12	12838	14396	27234	52.86%	265	239	504	47.42%	58
2012-13	13254	14809	28063	52.77%	271	246	517	47.58%	57
2013-14	13385	14904	28289	52.68%	285	250	535	46.73%	67
2014-15	13949	15393	29342	52.46%	300	265	565	46.90%	66
2015-16	14223	15222	29445	51.70%	278	265	543	48.80%	33
2016-17	13909	15140	29049	52.12%	295	264	559	47.23%	57
2017-18	13852	15397	29249	52.64%	332	275	607	45.30%	94
2018-19	13684	15289	28973	52.77%	311	259	570	45.44%	88
2019-20	13334	15568	28902	53.86%	293	266	559	47.58%	76
2020-21	12673	15866	28539	55.59%	302	267	569	46.92%	111
2021-22	12749	16691	29440	56.69%	304	267	571	46.76%	131

11. Arizona 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

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/>

participation test. Women are 56.69% of the student body, but just 46.76% of the student-athletes. Arizona has a student body of 29,440.

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, Arizona's participation gap was 131 athletes.² In other words, Arizona must add 131 additional athletic opportunities for women in order to provide athletic opportunities substantially proportionate to enrollment; 131 additional opportunities is a sufficiently large number to add four to five additional women's athletic teams when assuming athletic teams with approximately 25 athletes each.

13. The EADA data and evidence gathered on Arizona's website show that Arizona 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, Arizona's opportunities for women have gone up and down, but have stayed roughly the same since 2014. In 2007, Arizona offered 245 opportunities to women athletes. It did not match that same number of opportunities again until 2012.

Meanwhile, the gap between men and women's opportunities kept growing fast since 2010. *Champion Women* cannot know the 28-year history of adding sports between 1975 and 2003, but it cannot show a history of continuous program expansion that is demonstratively responsive to the growing interests of women in sport.

15. Arizona sponsors 8 men's varsity sports (Baseball, Basketball, Cross Country, Football, Golf, Swimming & Diving, Tennis, Track) and 13 women's varsity sports (Basketball, Beach Volleyball, Cross Country, Golf, Track, Gymnastics, Soccer, Softball, Swimming & Diving, Tennis, and Volleyball), but will have a total of 14 women's varsity sports next academic year with the addition of women's Triathlon.

16. Information available on Arizona'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.

17. Arizona women participate in the club sports of Archery, Badminton, Ballroom Dancing, Cycling, Disc Golf, Equestrian, Rodeo, Soccer, Synchronized Swimming, Fencing, Lacrosse, Roller Derby, Roller Hockey, Rugby, and Water Polo. The existence of all these women's club teams indicates that there is unmet interest in women's athletics at Arizona.

18. Arizona is part of the Pac-12 Conference, which covers an enormous geographical area, including California, the Pacific Northwest, and the Four Corners region of the Southwest. Other universities within the Pac-12 Conference include the University of Arizona, Arizona State University, University of California at Berkeley, University of California Los Angeles, University of Colorado, Boulder, University of Oregon, Oregon State University, University of Southern California, Stanford, University of Utah, University of Washington, and Washington

State University. Geography will not pose an impediment to Arizona finding competitors for its new women's teams.

19. The Pac-12 is in flux, but currently, it sponsors championships in women's Lacrosse and Rowing, two sports that Arizona is not sponsoring.

20. Members of the Pac-12 sponsor Acrobatics and Tumbling, Fencing, Field Hockey, Sailing, Squash, Synchronized Swimming, and Water Polo; all sports Arizona is not sponsoring.

21. Arizona is moving to the Big 12 Conference in 2024, with a similarly huge geographic region. Arizona will get to pick from many women's sports to grow their opportunities.

22. The Big 12 conference sponsors championship sports for women in Equestrian, Rowing, Soccer, all sports that the University of Arizona does not sponsor. Championship teams demonstrate women's interest in these sports and that competition for these women's sports exists in the competitive geographic area.

23. Members of the Big 12 sponsor women's sports of Ice Hockey, Lacrosse, Rifle, Skiing, Soccer, all sports that the University of Arizona does not sponsor. These 5 women's teams represent women's interest and ability in these sports and that competition for these women's sports exists in Arizona's competitive geographic area.

24. The University of Arizona recruits its student body and its athletes from the whole country and internationally.

Arizona High School Athletic Association sponsors girls' Badminton, Bowling, Lacrosse, and Wrestling. Arizona does not offer these sports.

Arizona high school female athletes have very few opportunities to compete in college sports, and even fewer opportunities in Division I. According to the NCAA,² in 2020, only 1.3% of high school girls basketball players were provided the opportunity to play in Division I, nationally. Just 2.9% of high school Field Hockey players, 2.8% of Golfers, 8.9% of Ice Hockey players, 3.7% of Lacrosse players, 2.4% of Soccer players, 1.8% of Softball players, 3.3% of Swimmers, 1.5% of Tennis players, 2.8% of Track & Field athletes, 1.2% of Volleyball players in high school nationally are provided opportunities to play their sport in Division I.

High school-age girls in Arizona and in the PAC 12/ Big 12 competitive geographic region are also active in club sports or travel teams that are not associated with their school, such as Basketball, Soccer, Golf, Tennis, Track & Field, Wrestling, Equestrian, Badminton, Table Tennis, Team Handball, Sailing, Field Hockey, Fencing, Wrestling, Rugby, Swimming & Diving, Skateboarding, Water Polo, Archery, Field Hockey, Rifle, Triathlon, Sport Climbing,

² NCAA: Estimated Probability of Competing in College Athletics:
<https://www.ncaa.org/sports/2015/3/2/estimated-probability-of-competing-in-college-athletics.aspx>

Artistic Swimming, Gymnastics, Rowing, and all sorts of combat sports, like Judo, Karate, and Taekwondo, to name a few.

These metrics demonstrate that women have expressed enormous demand to compete in sports that is unmet.

25. Sport Governing Bodies and the NCAA make it easy to see other competitors' locations. 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

26. 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.

27. A review of the Arizona website does not reveal that the school 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.

28. 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 Arizona provided its male and female students with the same opportunities to participate, Arizona would need to add **\$3,789,792 additional** athletic scholarship dollars, to balance out the amount Arizona provides to its male students.

29. If, for some reason, the OCR determines that Arizona is, in fact, not discriminating against women in providing opportunities in sport, and the student-athlete ratio is used instead of the student-body, then Arizona would not be required to add more scholarship dollars for women.

30. Arizona’s EADA data further indicates that the university provides inadequate and unequal funding for the recruitment of female athletes. In 2021-2022, Arizona spent \$1,885,982 on men’s recruitment and only \$708,252 on women’s recruitment; women were allocated only 27.30 percent of the recruiting budget even though they account for 46.76 percent of the athletic population and 56.69 percent of the full-time undergraduate population. If Arizona provided its male and female students with the same opportunities to participate, Arizona would need to add **\$1,760,877.00 additional** athletic scholarship dollars, to balance out the amount Arizona provides to its male students.

31. If, for some reason, the OCR determines that Arizona is, in fact, not discriminating against women in providing opportunities in sport, Arizona would still need to provide its women’s sports teams – and women’s coaches – with **\$438,162** more recruiting dollars in order to be consistent with the school’s investment in men’s sports.

IV. LEGAL ALLEGATIONS

32. 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).

33. 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).

34. 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).

35. 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*].

36. 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*].

37. In 1975, schools were given three years to be in compliance with the equal participation mandate under Title IX – or until 1978. Schools had 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. 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.

38. Therefore, it is understandable that Prong 2 is a strict 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*.

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.”

39. 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.

40. 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.*

41. 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).

42. 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.*

43. 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.*

44. 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.*

45. 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.*

46. 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.*

47. 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.*

48. 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 are 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.

49. 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.*

50. 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.*

51. 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).

52. 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)”)

53. 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.”

54. Arizona’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 benefits, as is also required by Title IX.

V. RELIEF REQUESTED

55. *Champion Women* expects OCR investigators will find additional violations of Title IX, the law guaranteeing women equal educational opportunities, including athletics. *Champion Women* requests that OCR:

- a. Investigate the University of Arizona to determine if it is discriminating against its female students; whether it is providing female students with equal participation opportunities in varsity athletics, equal and proportionate athletic scholarship dollars, and receiving equal treatment, including equal recruiting budgets.
- 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. Secure assurances of compliance with Title IX from the University of Arizona, that include full remedies for all the violations found.
- c. Among other steps to achieve compliance with Title IX, require the University of Arizona 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 the University of Arizona to ensure that the school achieves compliance with Title IX, now and in the future.

Respectfully submitted,



A handwritten signature in blue ink that reads "Nancy Hogshead". The signature is fluid and cursive, with a large initial 'N' and 'H'.

Nancy Hogshead, J.D., OLY
September 24, 2023