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ADMINISTRATIVE CLASS COMPLAINT

COMPLAINANT

Champion Women
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RECIPIENT

University of Indianapolis
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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 the University of Indianapolis (“Indianapolis”) 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 Indianapolis’s website indicates that Indianapolis 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 Indianapolis to determine whether it is discriminating against women; 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 remedying 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 Indianapolis currently violates Title IX’s athletic equity requirements, this complaint is timely.

III. FACTUAL ALLEGATIONS

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

9. Data submitted by Indianapolis 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 Indianapolis 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 in just one instance on our website: <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

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	767	1326	2093	63.35%	299	178	477	37.32%	339
2004-05	797	1417	2214	64.00%	295	159	454	35.02%	365
2005-06	861	1521	2382	63.85%	319	164	483	33.95%	400
2006-07	870	1581	2451	64.50%	342	196	538	36.43%	425
2007-08	940	1706	2646	64.47%	378	216	594	36.36%	470
2008-09	973	1734	2707	64.06%	334	206	540	38.15%	389
2009-10	1021	1861	2882	64.57%	415	242	657	36.83%	514
2010-11	1053	1964	3017	65.10%	446	277	723	38.31%	555
2011-12	1086	1945	3031	64.17%	389	231	620	37.26%	466
2012-13	1102	1996	3098	64.43%	443	299	742	40.30%	503
2013-14	1176	1991	3167	62.87%	430	229	659	34.75%	499
2014-15	1272	2092	3364	62.19%	425	260	685	37.96%	439
2015-16	1330	2137	3467	61.64%	456	279	735	37.96%	454
2016-17	1348	2241	3589	62.44%	475	258	733	35.20%	532
2017-18	1436	2388	3824	62.45%	526	264	790	33.42%	611
2018-19	1511	2551	4062	62.80%	524	278	802	34.66%	607
2019-20	1525	2541	4066	62.49%	585	272	857	31.74%	703
2020-21	1443	2420	3863	62.65%	528	254	782	32.48%	631
2021-22	1345	2362	3707	63.72%	578	294	872	33.72%	721

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. Indianapolis 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 63.72 of the student body, but just 33.72% 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, Indianapolis's participation gap was 721 female athletes. In other words, Indianapolis must add 721 additional athletic opportunities for women in order to provide athletic opportunities substantially proportionate to enrollment. Assuming that each new team has an average of 25 athletes – some more, some less, 721 athletes equal about 29 new athletic teams for women. Currently, Indianapolis only has 254 women athletes.

13. The gap between men and women has been excruciatingly large, never falling below 350; that's between 350 and 721 women per year that are being denied an educational experience that is known to impact their futures forever. While Indianapolis found the resources to add 279 opportunities for its male students, the school added less than half that for its female students, 116, over the same time period.

14. The EADA data and evidence gathered on Indianapolis's website show that Indianapolis 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.

15. Over the 19 academic years covered by the available EADA data, Indianapolis achieved its all-time high in 2012, a decade ago. Since then, the numbers have decreased from 299 in 2012, 229 the next year, 260 in 2014. In 2015 Indianapolis had 279 women athletes, and then proceeded to decline again for the next 5 years. *Champion Women* cannot know the 28-year history of adding women's sports between 1975 and 2003, but it is unlikely to show a history of continuous program expansion that is demonstratively responsive to the growing interests of women in sport.

16. A review of Indianapolis'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.

17. Indianapolis sponsors 10 men's varsity sports (Baseball, Basketball, Track, Football, Golf, Lacrosse, Soccer, Swimming and Diving, Tennis, and Wrestling) serving 505 men, and 9 women's varsity sports (Basketball, Track, Golf, Lacrosse, Soccer, Softball, Swimming and Diving, Tennis, and Volleyball), serving 254 women.

18. Information available on Indianapolis'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.

19. Indianapolis women participate in the club sports of bowling, equestrian, ultimate Frisbee, powerlifting, tennis, and water polo, *Campus Life*, University of Indianapolis, 2023 (last visited August 2023). The existence of these women's club teams indicates that there is unmet interest in women's athletics at Indianapolis.

20. Moreover, the University of Indianapolis is a member of the Great Lakes Valley Conference. Conference members hail from Iowa, Missouri, Illinois. This large geographic region will have most women's sports competing.

21. The Great Lakes Valley Conference sponsors women's Bowling as a championship sport, and Indianapolis does not sponsor women's varsity Bowling. Women's championship teams demonstrate women's interest in these sports and that competition for these women's sports exists in the competitive geographic area.

22. Members of the Great Lakes Valley Conference sponsor women's Field Hockey, Water Polo and Beach Volleyball, sports that Indianapolis does not sponsor. The existence of these teams demonstrates that interest and competition exist in the geographic area from which Indianapolis draws its students and with whom it competes to sustain additional varsity sports.

23. High school-age girls in the Great Lakes Valley Conference and the competitive geographic region compete in both school and club sports. These 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. Indianapolis does not sponsor any of these sports, despite these girls expressing interest and ability in these sports.

24. 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>

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>

25. Rugby, Equestrian, Triathlon, and 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.

26. A review of the Indianapolis 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.

27. 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 Indianapolis provided its male and female students with the same opportunities to participate, Indianapolis would need to add **\$5,247,551** additional athletic scholarship dollars, to balance out the amount Indianapolis provides to its male students.

28. If, for some reason, the OCR determines that Indianapolis is, in fact, not discriminating against women in providing opportunities in sport, then Indianapolis would not need to add additional scholarship money for women.

29. Indianapolis's EADA data further indicates that the university provides inadequate and unequal funding for recruitment of female athletes. In 2021-2022, Indianapolis spent \$95,727.00 on men's recruitment and only \$47,605.00 on women's recruitment; women were allocated only 33.21 percent of the recruiting budget even though they account for 33.72 percent of the athletic population and 63.72 percent of the full-time undergraduate population. Indianapolis would need to add **\$120,504** additional recruiting dollars to women – and women's coaches.

30. If, for some reason, the OCR determines that Indianapolis is, in fact, not discriminating against women in providing opportunities in sport, Indianapolis would still need to provide its women's sports teams – and women's coaches – with **\$361** more recruiting dollars in order to be consistent with the school's investment in men's sports.

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>

IV. LEGAL ALLEGATIONS

31. 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).

32. 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).

33. 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).

34. 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*].

35. 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*].

36. 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 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 discriminating against women, that it is not providing women with equal educational opportunities, but that their discrimination is acceptable, because the school is “improving” - that it is “still trying.” After 48 years. Imagine a place of public accommodation only allowing 75% of its facility to be used by people of color, but that this place of public accommodation has been increasing the size people of color are allowed to use, the number of people of color, over the past 48 years. And yet Title IX's Prong 2 allows schools to use this logic to continue to provide women with less.

37. 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*.

38. 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.

39. 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.*

40. 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).

41. 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.*

42. 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.*

43. 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.*

44. 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.*

45. 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.*

46. 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.*

47. 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.

48. 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.*

49. 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.*

50. 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).

51. 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)”).

52. 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.”

53. Indianapolis’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

54. *Champion Women* requests that OCR:

- a. Investigate the University of Indianapolis to determine whether it is discriminating against women; whether it is providing female students with equal athletic participation opportunities, equal and proportionate athletic scholarship dollars, and are 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.
- c. When violations are found, secure assurances of non-discrimination and compliance with Title IX from the University of Indianapolis, that include full remedies for women in athletics.

- d. Among other steps to achieve compliance with Title IX, require the University of Indianapolis to add athletic opportunities for women to equal men's opportunities in accord with Prong 1, provide these existing and additional teams and athletes the full range of benefits accorded to men's varsity teams and athletes, increase athletic scholarship dollars up to equality. Assure women athletes receive the same benefits and treatment, including recruiting budgets, as Indianapolis provides its male students.
- e. Monitor any resulting agreement with the University of Indianapolis to ensure that the school achieves compliance with Title IX, now and in the future.
- f. 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.



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

Nancy Hogshead, J.D., OLY
September 4, 2023