



United States Department of Education

Office for Civil Rights

DISCRIMINATION COMPLAINT FORM

You do not have to use this form to file a complaint with the U.S. Department of Education’s Office for Civil Rights (OCR). You may send OCR a letter or email instead of this form, but the letter or email must include the information in items 1-15 of this form. If you decide to use this form, please type or print all information and use additional pages if more space is needed. An online, fillable version of this form, which can be submitted electronically, can be found at:

<http://www.ed.gov/about/offices/list/ocr/complaintintro.html>.

Before completing this form, please read all information contained in the enclosed packet including: Information About OCR’s Complaint Resolution Procedures, Notice of Uses of Personal Information and the Consent Form.

If you have questions about civil rights or how to file a complaint, you may contact OCR at 800-421-3481, 800-877-8339 (TTY), OCR@ed.gov, or by calling the enforcement office that serves your state or territory. Contact information for enforcement offices can be found at:

<https://ocras.ed.gov/contact-ocr>.

If you have difficulty understanding English, you may, free of charge, request language assistance services for this Department information by calling 1-800-USA-LEARN (1- 800-872-5327) (TTY: 1-800-877-8339), or email us at:

Ed.Language.Assistance@ed.gov. If you are a person with a disability, you may request disability-related assistance by contacting OCR at 800-421-3481, 800-877-8339 (TTY), OCR@ed.gov, or by calling the enforcement office that serves your state or territory. Contact information for enforcement offices can be found at: <https://ocras.ed.gov/contact-ocr>. To request this document in an alternate format such as Braille or large print please contact the Department at 202-260-0852 or om_eeos@ed.gov.

1. Name of person filing this complaint:

Last Name: Hogshead, J.D., OLY **First Name:** Nancy **Address:** 2103 River Road

Champion Women, a non-profit providing legal advocacy for girls and women in sports.

City: Jacksonville **State:** Florida **Zip Code:** 32207

Primary number: (904) 384-8484 **Alternate number:** _____

Email Address: hogshead@championwomen.org and supportwomen@championwomen.org

2. Name of person discriminated against (if **other** than person filing). If the person discriminated against is age 18 or older, we will need that person's signature on this complaint form and the consent/release form before we can proceed with this complaint. If the person is a minor, and you do not have the legal authority to file a complaint on the student's behalf, the signature of the child's parent, guardian, or other authorized legal representative is required.

Last Name: N/A First Name: _____ Address: _____
City: _____
State: _____ Zip Code: _____
Primary Phone: _____ Alternative Phone: _____
Email Address: _____

3. OCR investigates discrimination complaints against schools, colleges and universities, institutions, and agencies which receive funds or other forms of financial assistance from the U.S. Department of Education and against public educational entities and libraries that are subject to the provisions of Title II of the Americans with Disabilities Act. Please identify the institution or agency that engaged in the alleged discrimination. If we cannot accept your complaint, we will attempt to refer it to the appropriate agency and will notify you of that fact.

Name of Institution: Michigan State University – OCR # 15-23-2263

Address: 426 Auditorium Road

City: East Lansing State: MI Zip Code: 48824

Department/School: Athletics Department

4. The regulations OCR enforces prohibit discrimination on the basis of race, color, national origin, sex, disability, or age. The regulations also ban retaliation against persons who assert the right to be free from discrimination. Please note the following:
- Discrimination based on race, color, and national origin includes failure to provide meaningful access to English learners and limited English proficient parents and guardians, as well as discrimination based on shared ancestry or ethnic characteristics or based on citizenship in a country with a dominant religion.
 - Discrimination based on sex includes discrimination based on sex stereotypes, pregnancy or related conditions, sexual orientation, and gender identity, as well as rules about parental, family, or marital status that treat people differently based on sex.
 - Discrimination based on disability includes discrimination against individuals who have a physical or mental impairment that substantially limits a major life activity, as well as individuals who have a record of or are regarded as having a disability.
 - Discrimination based on age does not limit protection against discrimination to a certain age group (e.g., people over 40); however, there are a variety of exceptions to the relevant Federal law that may permit age to be taken into account.
 - Retaliation refers to actions taken for the purpose of interfering with any rights under the laws enforced by OCR, or because you made a complaint, testified, or participated in any manner in an OCR proceeding.

Please indicate the basis of your complaint:

Discrimination **based on race (specify)**

Discrimination **based on color (specify)**

Discrimination **based on national origin (specify)**

Discrimination **based on sex (specify)**

Michigan State University is discriminating on the basis of sex by providing women with unequal athletic scholarship dollars and unequal treatment and benefits, including athletic recruitment funding.

More areas of sex discrimination are expected to be found with an investigation, including:

(1) Provision and maintenance of equipment and supplies;

(2) Scheduling of games and practice times;

(3) Travel and per diem expenses;

(4) Opportunity to receive tutoring and assignment and compensation of tutors;

(5) Opportunity to receive coaching, assignment, and compensation of coaches;

(6) Provision of locker rooms, practice, and competitive facilities;

(7) Provision of medical and training services and facilities;

(8) Provision of housing and dining services and facilities;

(9) Publicity;

(10) Support services; and

(11) Recruiting.

See more assessment factors on each of these treatment issues at: “A Policy Interpretation: Title IX and Intercollegiate Athletics,” Federal Register, Vol. 44, No. 239, 1979, available at: <https://www2.ed.gov/about/offices/list/ocr/docs/t9interp.html>

See also, “Title IX and Athletic Opportunities in Colleges and Universities, A Resource for Students, Coaches, Athletic Directors, and School Communities” February 2023, available at: <https://www2.ed.gov/about/offices/list/ocr/docs/ocr-higher-ed-athletic-resource-202302.pdf>

Discrimination **based on disability (specify)**

Discrimination **based on age (specify)**

Retaliation because you filed a complaint or otherwise asserted rights under laws enforced by OCR (specify)

Violation of the Boy Scouts of America Equal Access Act (specify)

5. Please describe each alleged discriminatory act. For each action, please include the date(s) the discriminatory act occurred, the name(s) of each person(s) involved and, why you believe the discrimination was because of race, disability, age, sex, etc. Also please provide the names of any person(s) who was present and witnessed the act(s) of discrimination.

Sex Discrimination Complaint

Michigan State University

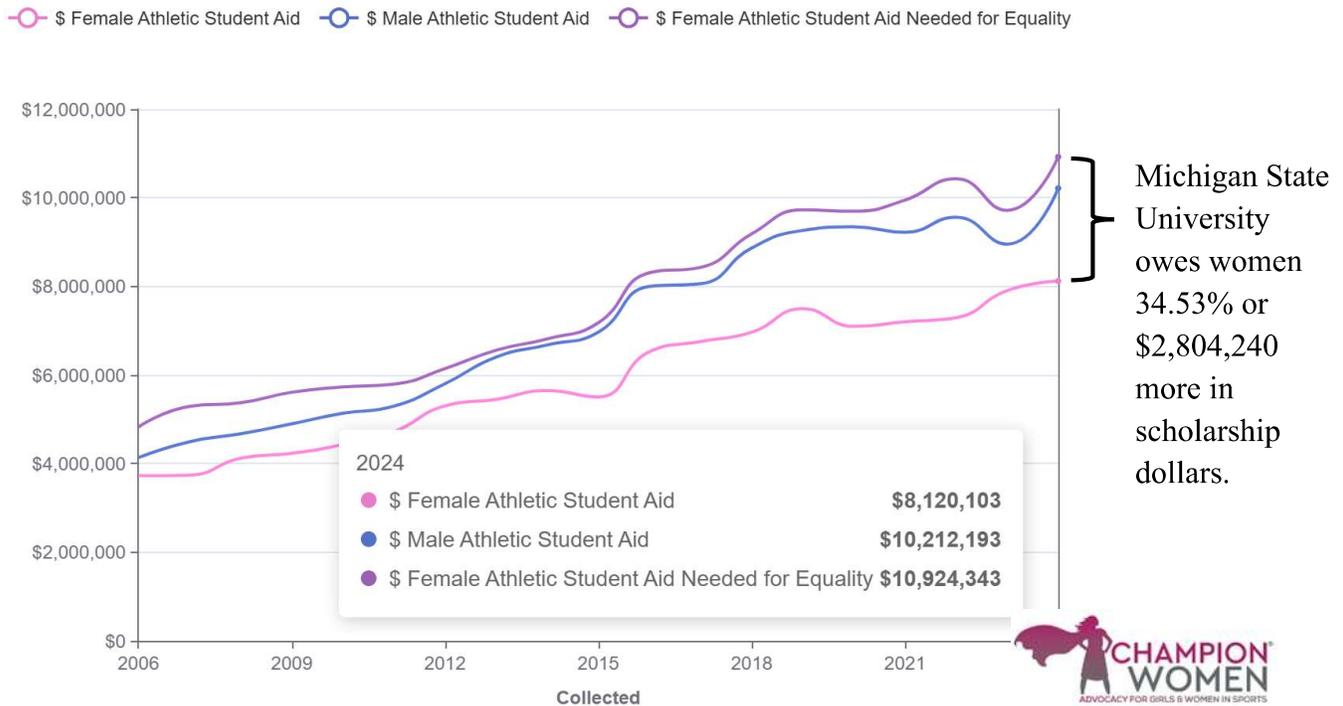
Michigan State University is discriminating on the basis of sex by providing women with unequal athletic scholarship dollars, and unequal treatment and benefits, including athletic recruitment funding.

I. Michigan State University Is Discriminating Against Women in Awarding Equal Athletic Scholarship Dollars.

Scholarships are important sources of funding for educational attainment, but women at Michigan State University are being denied equality because of their sex.

Michigan State University

Scholarships



The bracket to the right of the graph demonstrates that Michigan State University needs to increase athletic scholarships for female athletes by **34.53%, which is \$2,804,240 additional athletic scholarship dollars for women.**

Michigan State University

2024 Scholarship Gap

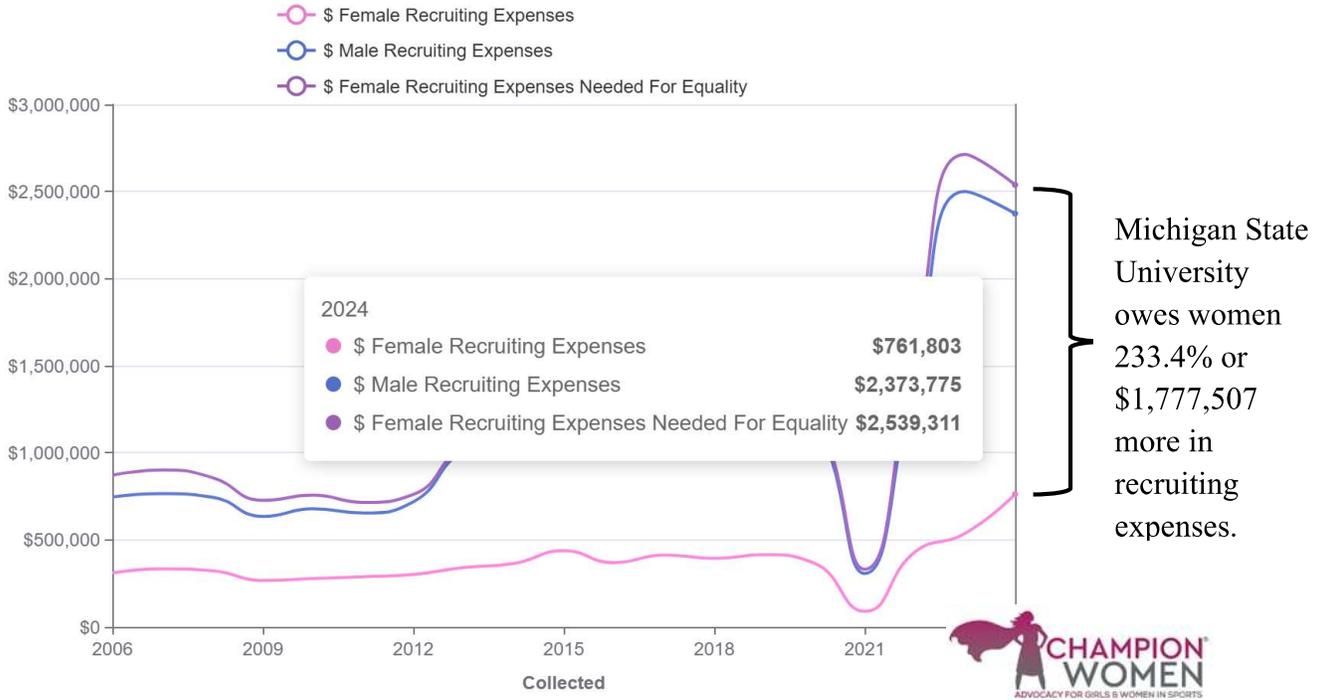


Our mission is to ensure equal access to education and to promote educational excellence nationwide through the enforcement of civil rights.

II. Michigan State University Is Discriminating Against Women in its Treatment and Benefits, including Recruiting.

Michigan State University

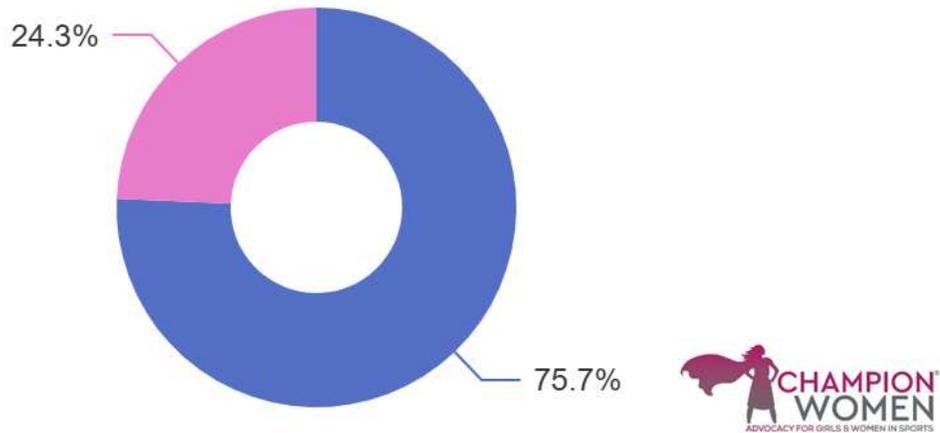
Recruiting Expenses Gap



The bracket to the right of the graph demonstrates that Michigan State University needs to increase recruiting expenses for female sports and female athletes by 233.4% or \$1,777,507 more recruiting dollars, to equal the amounts spent on men.

Michigan State University

2024 Recruiting Expenses



“Recruiting” has been part of OCR Regulations to measure athletic benefits and treatment, and it has been included in the Laundry List since 1975.¹ “...where an institution recruits potential student-athletes for its men's teams, it must ensure that women's teams are provided with substantially equal opportunities to recruit potential student-athletes.” See 34 C.F.R. § 106.41(a) and “A Policy Interpretation: Title IX and Intercollegiate Athletics,” 44 Fed. Reg. 71,413, 71,415 (1979).

Unlike most public high schools, most athletes attend their college or university because of the school’s recruiting efforts. It is not a fluke that men over 6’9” just happen to be walking around

¹ “Title IX and Athletic Opportunities in Colleges and Universities, A Resource for Students, Coaches, Athletic Directors, and School Communities” February 2023, available at: https://in.ewu.edu/titleix/wp-content/uploads/sites/119/2023/12/OCR_TitleIXAthleticsResources_Feb2023.pdf Pages 5 and 6: “Recruitment. Are coaches and other personnel given substantially equal opportunities to recruit women and men for athletic teams? (For example, the amount of time coaches have to recruit, similar and appropriate geographic range for recruiting) Is recruitment for men and women athletes funded in a way that is equivalently adequate to meet the needs of each men’s and women’s athletic program? (For example, funds for outreach, brochures, visiting campuses) Do the differences in benefits, opportunities, and treatment afforded to women or men who are prospective athletes have a disproportionately limiting effect upon the recruitment of students based on sex?” (Note: this resource has been withdrawn from the Department of Education Office for Civil Rights website, but the quote is consistent with prior regulations and case law.)

campus with stellar basketball programs. In other words, when a school needs to attract athletes to its campus, the school hires a coach and staff and empowers them to go out and get these elite athletes. Recruiting has been a proven strategy for athletic success for over a century.

To comply with Prong 3, “the institution may also be **required to actively encourage the development of intercollegiate competition** for a sport for members of the underrepresented sex when overall athletic opportunities within its competitive region have been historically limited for members of that sex.”²

Courts have recognized that demand for sports at a particular college is due in part to the sports that the school provides women, and a school's efforts to attract these athletes to the campus. See *Neal v. Bd of Trs. Of Cal. State Univs.*, 198 F.3d 763, at 769 (9th Cir. 1999); (“[T]he creation of additional athletic spots for women would prompt universities to recruit more female athletes, in the long run shifting women's demand curve for sports participation. As more women participated, social norms discouraging women's participation in sports presumably would be further eroded, prompting additional increases in women's participation levels”); See also, *Cohen v. Brown Univ.*, 101 F.3d 155, 177 (1st Cir., 1996), cert. denied, 520 U.S. 1186 (1997); (“[B]ecause recruitment of interested athletes is at the discretion of the institution, there is a risk that the institution will recruit only enough women to fill positions in a program that already under-represents women, and that the smaller size of the women's program will have the effect of discouraging women's participation”).

Schools and their athletic departments determine the relative interests of men and women on campus when they choose their sports offerings and decide the sums spent on recruiting. Recruiting provides an increased number of new students with an interest and ability to participate in sports.

For example, when NCAA schools started the sport of rowing, only a few private schools in the northeast offered the sport at the high school level. In other words, a school creates athletic opportunities for students and then recruits athletes to fill the opportunities created. Title IX simply requires that schools allocate these school-created slots in a nondiscriminatory manner.

² *Clarification of Intercollegiate Athletics Policy Guidance: The Three-Part Test*, January 16, 1996, available at: <https://www2.ed.gov/about/offices/list/ocr/docs/clarific.html>

As courts have recognized, “Crew or rowing is an example of a sport in which interest commonly develops only after matriculation at college.” *Cohen v. Brown Univ.* 879 F. Supp., 185 at 207, (D.R.I., 1999), (usually referred to as “*Cohen III*”). Before high schools adopted rowing more widely, a school’s rowing recruiting efforts included scholarships, open tryouts, coaches walking through campus in search of tall, broad-shouldered women, and advertisements in school newspapers. (Male rowers were traditionally recruited to college campuses using precisely these techniques.)

A coach’s career is tied to win/loss records, and much of winning is the direct result of a coach’s ability to recruit athletes to compete on the women’s team.

As we say in sport:

“The tail of the bell-shaped curve for athletic performance is long.”

This quote is meant to convey that the differences within and between athletic performance standard deviations are *enormous*, even in this hyper-elite cadre of potential high school students.

III. Michigan State University is Discriminating Against Women in Athletic Facilities.

Unequal treatment, as measured by Title IX (facilities, equipment, locker rooms, travel, publicity, etc.), impacts how the school’s overall program and the educational opportunity that the women’s coach can offer. In other words, differences in all the other athletic benefits and treatment afforded to female prospective athletes, as compared to their male peers, have a disproportionately limiting effect on women’s athletic overall experience. Together, specific types of sex discrimination are impossible to disaggregate from the sex discrimination women experience overall.

Unequal Men’s and Women’s Facilities:

It is not difficult for recruits of all sports to see glaring differences between women’s softball and men’s baseball facilities, as just one example.

Photos of men’s locker rooms and teams' hosting areas are typically available online for potential recruits to contrast with the women’s locker rooms and hosting areas, but at Michigan State University, *Champion Women* was unable to find photos of women’s locker rooms and hosting areas.

Sex Discrimination in Michigan State University Athletic Facilities. (Note: Champion Women could not find photos of women’s facilities that are comparable to Men’s Football and Men’s Baseball.)

Michigan State University Athletic Facilities:

Spartan Stadium: Men’s Football Stadium





Football Stadium: Opened in 1923, last major renovation in 2025, capacity: 74,866.

Men's Football Game-Day Locker Room:



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Tom Izzo Football Building:



Men's Football Locker Room:



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Nike Gear Lab: Extension of the Men's Football Locker Room:



Our mission is to ensure equal access to education and to promote educational excellence nationwide through the enforcement of civil rights.

Men's Football Weight Room:



Our mission is to ensure equal access to education and to promote educational excellence nationwide through the enforcement of civil rights.

Men's Football Auditorium/Meeting Room:



Our mission is to ensure equal access to education and to promote educational excellence nationwide through the enforcement of civil rights.

Skandalaris Football Center/Duffy Daugherty Football Building:



Our mission is to ensure equal access to education and to promote educational excellence nationwide through the enforcement of civil rights.

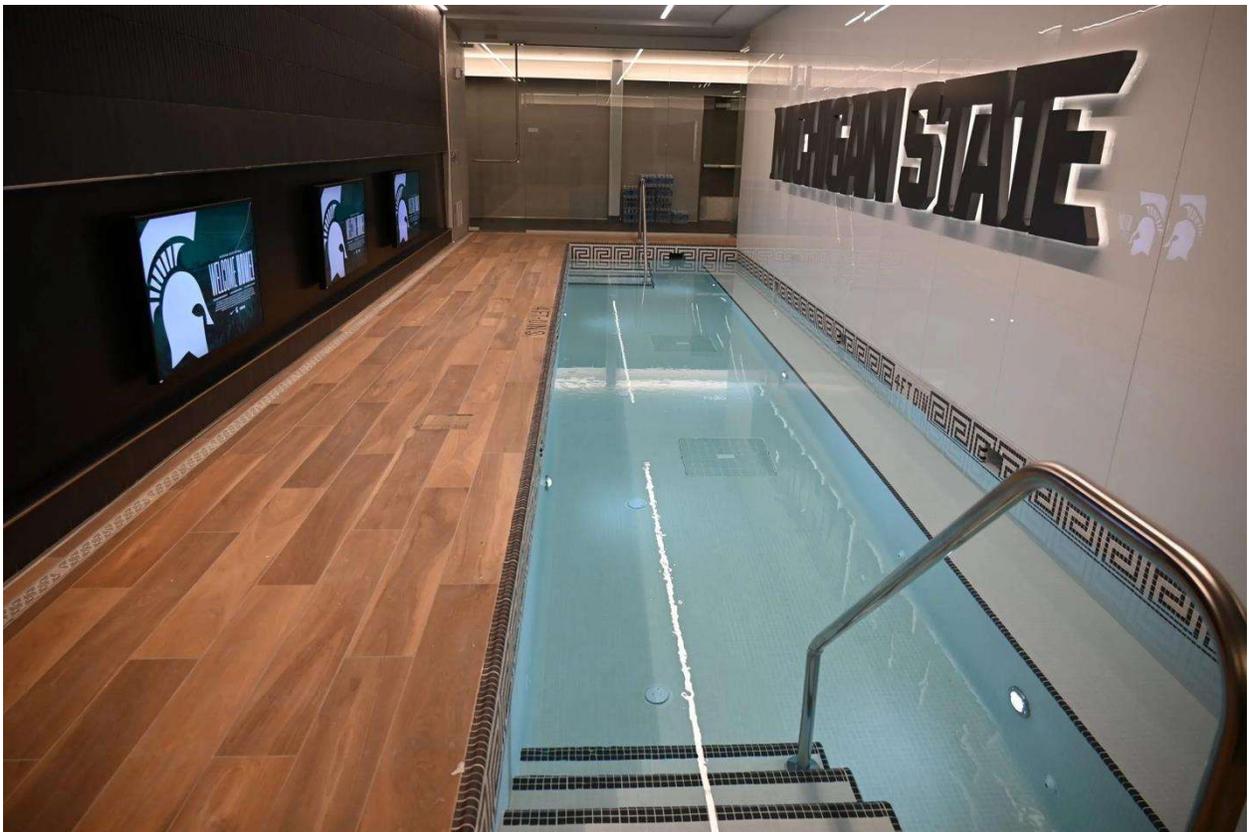


Football Meeting Room:



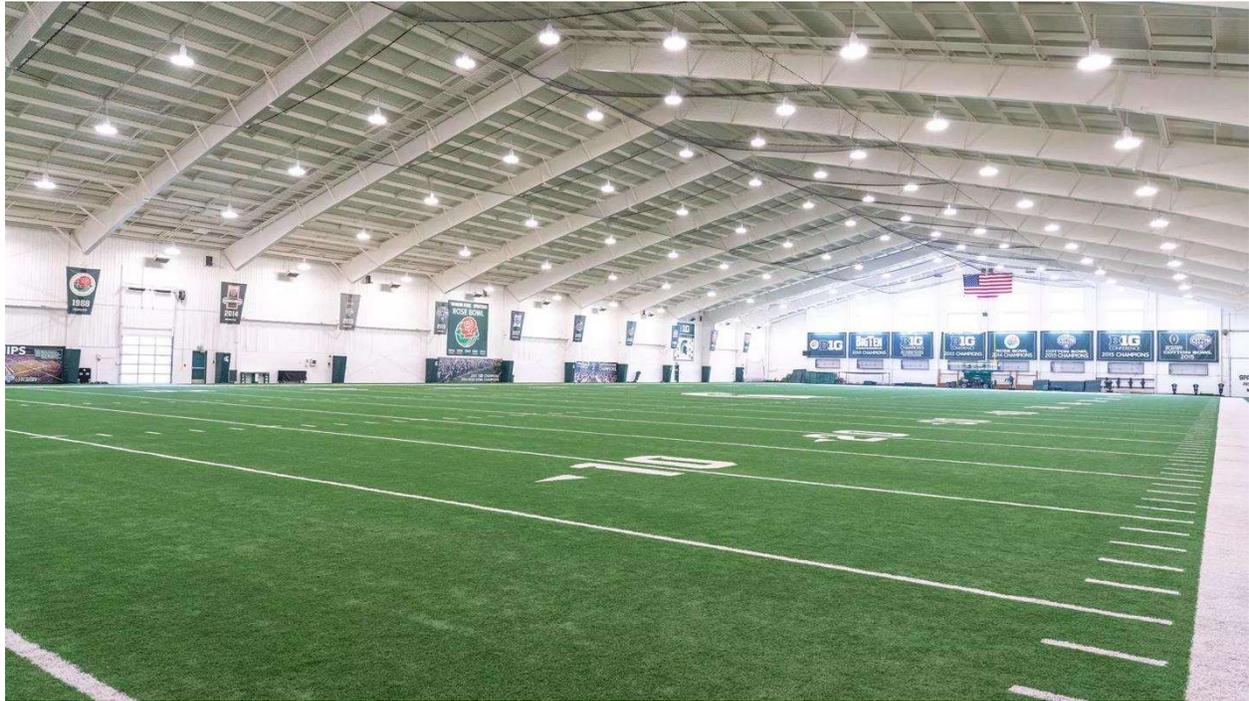
Our mission is to ensure equal access to education and to promote educational excellence nationwide through the enforcement of civil rights.

Football Athletic Training Facilities:



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Men's Football Indoor Practice Field:



McLane Stadium: Men's Baseball



Jeff Ishbia Field at McLane Stadium: Men's Baseball



Men's Baseball Stadium: Built in 2009, capacity: ~2,500.

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Indoor Hitting and Pitching Facility: Men’s Baseball and Women’s Softball



Munn Ice Arena: Men’s Ice Hockey



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Ron Mason Rink at Munn Ice Arena: Men’s Ice Hockey



Men’s Ice Hockey Arena and Rink: Opened in 1974, majorly renovated in 2022, capacity: 6,114.

Men’s Ice Hockey Locker Room:



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Breslin Center: Men’s Basketball, Women’s Basketball, and Women’s Volleyball



Basketball and Volleyball Arena: opened in 1989, majorly renovated in 2017, capacity: ~15,000.

Our mission is to ensure equal access to education and to promote educational excellence nationwide through the enforcement of civil rights.

Men’s Basketball Locker Room:



Women’s Basketball Locker Room:



Champion Women is unable to find an image of the Women’s Volleyball Locker Room.

Secchia Stadium: Women's Softball Stadium



Women's Softball Stadium and Field: Opened in 2011, capacity: 1,100.



Women's Softball Stadium and Field: Opened in 2011, capacity: 1,100.

Champion Women is unable to find an image of the Women's Softball Locker Room.

Ralph Young Field: Women’s Field Hockey and Men’s and Women’s Track & Field



Ralph Young Field: Opened in 1937, renovated in 2002, capacity: ~1,500.

Champion Women is unable to find an image of the Women’s Ice Hockey Locker Room.

Please *Champion Women’s Resource for Office for Civil Rights for Recruiting and Sex Discrimination, Title IX, 2025.*³

Facilities and publicity are crucial for women athletes and their teams; creating a potential economic loss in “Name Image and Likeness” (NIL) opportunities, and thereby impacting recruiting.

In combination, when schools provide women with additional types of unequal treatment and unequal opportunities to recruit, they send a loud signal that women’s sports are second-class; they are less valuable to the institution.

Thus, deficient recruiting budgets impact the overall morale of women’s coaches, female students, faculty, alumni, donors, professors, and beyond.

To address these disparities, *Champion Women* requests that the Office for Civil Rights (“OCR”) investigate Michigan State University to determine whether it is discriminating against women in its athletic department.

With an OCR investigation, additional Title IX violations are expected to be found, 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), 1979 Policy Interpretation.

³ *Champion Women* has written Resource for OCR Regarding RECRUITING and Sex Discrimination 2025, available at: <https://irp.cdn-website.com/3b7fae75/files/uploaded/Resource+for+OCR+regarding+RECRUITING+and+Sex+Discrimination+2025-d190fa34.pdf>

See also, 34 CFR 106.41(10), 1975, Publicity:

“Publicity (§ 86.41(c)(10)). Compliance will be assessed by examining, among other factors, the equivalence for men and women of:

- (1) Availability and quality of sports information personnel;
- (2) Access to other publicity resources for men's and women's programs; and
- (3) Quantity and quality of publications and other promotional devices featuring men's and women's programs.” “A Policy Interpretation: Title IX and Intercollegiate Athletics,” Federal Register, Vol. 44, No. 239, 1979, available at: <https://www2.ed.gov/about/offices/list/ocr/docs/t9interp.html>

When violations are found, Champion Women is requesting that the OCR secure assurances of compliance with Title IX that include **full remedies**.

Champion Women's extended discussion of some of these types of sex discrimination – participation, athletic scholarships, 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, publicity; and recruiting – will hopefully clarify how the sex discrimination in athletics flows across these sectors. All the different types and measures of sex discrimination in athletics cannot be disaggregated.

6. Do you have documents or written information that you think will help us to understand your complaint?
- No
 Yes

If yes, please describe the documents or written information you have.

Please see the attached file - "Champion Women OCR Complaint Michigan State University "

If OCR investigates your complaint, we may ask you to provide us with the items you describe above.

7. What is the most **recent date** you were discriminated against?

Date: The discrimination against women on the basis of sex is ongoing at Michigan State University.

8. If this date is **more than 180 days ago**, you may request a waiver of the filing requirement.

I am requesting a waiver of the 180-day time frame for filing this complaint.

Please explain why did not file your complaint within 180 days.

1. Have you complained about the allegations that you raise in this complaint to your school, institution, or another organization or agency?

YES X NO

If yes, have you complained about the allegations that you raise in this complaint by:

- filing an internal complaint or appeal with your school or institution?
- participating in your school or institution's grievance procedures?
- participating in a due process hearing either at your school or institution, or through another organization or government agency.

If you answered **yes to any of the above questions**, please describe the allegations that you raised in an internal complaint or appeal, through your school or institution's grievance procedures, or in a due process hearing, identify the date you complained about the allegations and where you made the complaint, and tell us the status of the complaint, appeal, grievance procedures, or due process hearing. If possible, please provide us with a copy of your complaint or grievance or appeal or due process request and, if completed, the decision in the matter.

-
2. If the allegations contained in this complaint have been filed with

any other Federal, state or local civil rights agency, or any Federal or state court, please give details and dates. We will determine whether it is appropriate to investigate your complaint based upon the specific allegations of your complaint and the actions taken by the other agency or court.

Agency or Court:

 N/A

Date Filed: _____

Case Number or Reference:

Results of Investigation/Findings by Agency or Court:

3. You do not need to have a lawyer to file a complaint with OCR; however, if you do have a lawyer, OCR staff are required to communicate directly with your lawyer. If you have a lawyer representing you in this matter, please provide the lawyer’s contact information.

Last Name: Hogshead, J.D., OLY First Name: Nancy

Telephone: (904) 384-8484 Email:

hogshead@championwomen.org and
supportwomen@championwomen.org

4. If we cannot reach you at your home or work, we would like to have the name and telephone number of another person (relative or friend) who knows where and when we can reach you. This information **is not required**, but it will be helpful to us.

Last Name: _____ First Name:

Telephone: _____ Email:

5. **Option to Participate in OCR’s Early Mediation Process**

OCR provides an early mediation process as an opportunity for you and the recipient institution to voluntarily resolve your complaint soon after you file it with OCR.

Mediation is a form of complaint resolution that OCR offers as an alternative to its investigative process. Mediation is an informal process in which a staff member from OCR who is trained in mediation assists the parties to reach a negotiated resolution of the complaint. The mediator does not decide who is right or wrong and does not have the authority to impose a settlement on the parties. Instead, the mediator helps the parties to find a mutually acceptable resolution to your complaint. Mediation is a strictly voluntary process. If either party does not want to participate in mediation, OCR will address the complaint through its regular processes.

If you are interested in participating in the early mediation process, you must check the box below. If you indicate your interest in early mediation by checking the box below **and** OCR determines that your complaint is appropriate for this process, OCR will contact you and the recipient institution and offer this resolution option. If the recipient agrees to participate in early mediation, OCR will work with you and the recipient to achieve a mutually agreeable resolution of your complaint. If the recipient does not wish to participate in early mediation, OCR will proceed with its regular processing of your complaint. ***If you do not indicate your interest in early mediation by checking the box below, early mediation will not be offered to you and OCR will proceed with its regular processing of your complaint.***

I am interested in participating in early mediation (Please check box)

6. What would you like the institution to do as a result of your complaint — what remedy are you seeking?

Investigate Michigan State University to determine whether it is discriminating against women in athletics; whether it is providing female students with equal participation opportunities in varsity

athletics, equal and proportionate athletic scholarship dollars, equal treatment and benefits, including equal recruiting budgets.

Take all necessary steps to remedy all unlawful conduct identified by Title IX and its implementing regulations.

To add equal athletic opportunities for women as the Michigan State University men, and to accord women athletes and these additional teams the full range of benefits accorded to men's varsity teams and athletes, such as 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), 1979 Policy Interpretation. Increase scholarship and recruiting budgets and opportunities, to be equal to the men's, and adopt and implement a plan to achieve full compliance with Title IX throughout the entire athletic department.

7. We cannot accept your complaint if it has not been signed. Please sign and date your complaint below.



January 6, 2026
(Date)

CEO, *Champion Women*
(Signature)

Please mail or email the completed and signed Discrimination Complaint Form, your signed consent form and copies of any written material or other documents you believe will help OCR understand your complaint to the OCR Enforcement Office responsible for the state where the institution or entity about which you are complaining is located. You can locate the mailing information for the correct enforcement office on OCR's website at <https://ocrcas.ed.gov/contact-ocr>