Gender Equity and Title IX in 1992

by

Susan K. Mehringer

Dr. John Reno

Ball State University
Muncie, Indiana
July 15, 1992

Graduation: Summer, 1992
Table of Contents

Abstract..............................................................1

Introduction....................................................................2

Chapter 1
History of Title IX.....................................................3

Chapter 2
Current Status of Title IX...........................................8

Chapter 3
Future of Gender Equity and Title IX.........................13

Works Consulted........................................................17
Abstract

It seems that each year, one issue or topic comes to the forefront in college athletics. For 1992, the issue has been gender equity and compliance with Title IX. Ironically, the subject has received more attention in the year that marks the 20th anniversary of Title IX than any other time in the past two decades. This can attributed to several factors including recent Supreme Court rulings and the budget cuts many colleges and universities are being forced to make. The purpose of this thesis is to examine the history of Title IX, particularly in the judicial system, the status of gender equity and compliance with Title IX by NCAA member-institutions, and the future of gender equity in intercollegiate athletics.
Title IX of the Education Amendment Act of 1972 requires that:

No 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 (The Department of Education 1).

The regulation to implement Title IX was issued by the Office for Civil Rights, Department of Health, Education, and Welfare (OCR/HEW) and became effective on July 1, 1975. The Department of Education reissued the regulation in May, 1980. The regulation states specific prohibitions of sex discrimination in education programs and activities receiving Federal funds. Sex discrimination is prohibited in admissions, treatment of students and employment.

Complaints alleging Title IX violations should be filed with the Office of Civil Rights (OCR). OCR has the authority to investigate complaints or to review compliance in the absence of complaints. If compliance violations are found, OCR must attempt to achieve compliance through informal means. If compliance cannot be achieved through voluntary means, OCR may begin administrative proceedings to terminate Federal funds or refer the case to the Department of Justice for court action to achieve compliance.
Chapter 1
History of Title IX

Title IX is a statute with which all institutions receiving Federal funding must comply. Although it has been in effect for 20 years, Title IX is still being debated. The NCAA, which once fought against the statute, has now made Title IX and gender equity a top priority. The Supreme Court has been involved with the issue for some time. A discussion of its decisions relating to Title IX shows the evolution that the issue has undergone in becoming one of the hot topics in intercollegiate athletics today. Have the recent Supreme Court decisions caused the NCAA to study whether or not its member institutions are complying with Title IX? The Supreme Court has established a trend that if colleges and universities are not complying with Title IX on their own accord, the Court will make sure they do in the future.

Title IX was not eagerly welcomed by the NCAA. Walter Byers, the executive director of the NCAA at the time, lobbied hard against Title IX because it spelled "the possible doom of intercollegiate athletics" (Guttmann 222). Three years later, the NCAA fought for Senator John Tower's amendment which would have exempted the so-called revenue-producing sports, most of which are men's sports. The NCAA's lobbying, which persisted through 1976, was unsuccessful.

An examination of court cases decided before and after the passage of Title IX shows the attitude toward gender equity even at the high school level has changed. In a case in Hamden, Connecticut, Susan Hollander sued her school board for the right to try out for the boys' cross-country team because there was no girls' team. John Clark FitzGerald of New Haven Superior Court ruled against her on the basis that the "savor" of athletic competition for boys would be ruined if girls were allowed to challenge them. "Athletic competition builds character in our boys," he ruled. "We do not need that kind of character in our girls" (Guttmann 221). Also decided before the passage of Title IX, the Superior Court of New Jersey ruled in Gregorio v. Board of Education of Asbury Park (1971) that girls had no right to join the boys' tennis team simply because there was no girls' team (Guttmann 221).

After the passage of Title IX, the U.S. Court of Appeals for the 6th District of Michigan ruled in Morris v. Michigan Board of Education (1973) that girls had the right to try out for the boys' tennis team even when there was a girls' team for them to play on (Guttmann 221).
However, the movement toward equality suffered a major setback in 1984. The Supreme Court ruled in *Grove City College v. Bell* (1984) that illegal discrimination within a single department was not grounds for action against an entire college or university (Guttmann 221). In other words, if the geology department refuses to hire women, the courts declared they are liable to lose their federal grants, but their colleagues in physical education will continue to be funded.

In 1988, Congress again restated its original intent and mandated that the whole institution lose its federal funds if any one department is found guilty of discrimination. President Reagan vetoed this legislation, but Congress overrode the veto (Guttmann 222).

Perhaps the most critical legal ruling regarding Title IX was decided in February, 1992. The decision has expanded the remediation available to Title IX plaintiffs. The Supreme Court ruled in *Franklin v. Gwinnett County Public Schools* that a Title IX plaintiff may recover monetary damages for intentional violations of the statute (Scott, Semo 16).

The case involved a former high school student who claimed that she had been subjected to verbal and physical sexual harassment by a sports coach/teacher employed by the school district. She also alleged that school officials were aware of the harassment but did nothing to stop it and discouraged her from pressing criminal charges. Both the lower court and the Court of Appeals dismissed her complaint stating that Title IX does not authorize an award of damages (Scott, Semo 1).

Title IX does not spell out what type of relief is available to an injured party and on whether a private party may file suit to enforce the law. The Supreme Court decided in *Cannon v. University of Chicago* (1979) that Title IX is enforceable through an implied right of action. Therefore, the Court said “the question of what remedies are available under a statute that provides a private right of action is ‘analytically distinct’ from the issue of whether such a right exists in the first place” (Scott, Semo 16).

Typically, Title IX actions have involved claims for declaratory and/or injunctive relief. In those cases, the plaintiff asks the court to declare that the institution is violating Title IX and to prohibit it from continuing to do so (Scott, Semo 16).

However, these actions did not provide adequate relief for the plaintiff in this case since she had already graduated and the teacher no longer worked for the school system.
The Bush Administration, which had filed a “friend of the court” brief, joined the school system in arguing that Title IX remedies should be limited to back pay and prospective injunctive relief and opposed the award of damages.

The Court rejected those arguments. It cited the general rule, that, without clear direction from Congress that orders otherwise, Federal courts have the power to award any appropriate relief, including damages. It found no evidence of Congressional intent to limit application of this general principle in the enforcement of Title IX.

Justice Byron White, joined by five other members, wrote that “absent clear direction to the contrary by Congress, the federal courts have the power to award any appropriate relief in a recognizable cause of action brought pursuant to a federal statute” (Lederman, “Supreme Court Rules” A39).

Three other justices, led by Justice Antonin Scalia, concurred with the judgment; however, reservations were expressed about the Court’s willingness to grant such expansive remediation to a right that had not been explicitly granted by Congress (Lederman, “Supreme Court Rules” A39).

The most recent cases involving Title IX have involved injunctive relief and/or court orders, not monetary relief.

Supporters of women’s volleyball at California State University, Fullerton, gained a temporary restraining order in February to prevent the university from discontinuing the sport from its athletics program. The action came after Cal State Fullerton athletics officials announced that women’s volleyball and men’s gymnastics would be discontinued.

According to volleyball coach Jim Huffman, Cal State Fullerton offered 17 varsity sports - nine for men and eight for women - involving approximately 268 males and 97 female athletes. The proposed cuts would reduce the numbers three percent for men and 12 percent for women (Hagwell 17).

Cal State Fullerton’s assistant athletic director for media relations, Mel Frank, stated that the decision to drop women’s volleyball and men’s gymnastics came after athletic department officials analyzed the costs to promote all of the university’s sports as regional and national competitors. The plan was endorsed by the university president and the athletic council (Hagwell 17).

The criteria used to evaluate each sport included emphasis on the sports sponsored by the
NCAA and the Big West Conference, competitive potential, scheduling opportunities, recruiting base, revenue potential, cost-effectiveness, and tradition on the campus (Hagwell 17).

The Cal State volleyball team has compiled a 17-173 conference record over the last 12 seasons and is 8-46 in Big West Conference play under Huffman.

Only a year ago, the university's athletic council, student senate, and athletic officials voted to drop the football program. University president Milton Gordon rejected the move. The Titans football team posted a 2-9 mark in 1991 and has not defeated a Division I-A team in three seasons. Athletic director Bill Shumard said the university "remains committed to Division I-A football with the new on-campus stadium and our marketing and scheduling abilities to determine its funding and competitive expectations" (Hagwell 17).

The University of New Hampshire reinstated its women's tennis program in response to a threatened sex discrimination suit. Women's tennis and men's wrestling were cut from the athletics program in July, 1991, helping to reduce its annual subsidy of the sports program by $309,000. University officials claim they would have reinstated the women's tennis program on their own because they had realized their mistake. The lawsuit only served to speed up the process (Blum, "Facing Lawsuit" A45-6).

Approximately a month later, a suit was filed against Brown University by nine women claiming the university had discriminated against women in its athletics program. The suit sought the reinstatement of the varsity women's gymnastics and volleyball teams which were eliminated in 1991, and an order requiring the university to provide equal athletics opportunities for women and men (Blum, "Suit Accuses Brown U." A44).

In the spring of 1991, Brown dropped men's golf, water polo, women's gymnastics, and volleyball as part of a university-wide budget reduction (Blum, "Suit Accuses Brown U." A44).

A case in which the final resolution is still uncertain involves Brooklyn College. The Office for Civil Rights found that the college was in violation of Title IX in the accommodation of athletics interests and abilities of men and women and in the provision of equal opportunity for male and female athletes in a series of program areas. However, the OCR found the college was in compliance with Title IX in the awarding of athletics financial assistance ("Title IX Ruling Received" 14).
Brooklyn College had failed to meet the requirement of Title IX which states that institutions must effectively accommodate equally the athletics interests and abilities of its female students. Specifically, OCR found that the participation opportunities for men and women students were not substantially proportionate to their respective enrollments ("Title IX Ruling Received" 17).

OCR also determined that the college's pattern of reducing its athletic offerings did not demonstrate a history of program expansion that was demonstrably responsible to women, nor had Brooklyn conducted a survey of student interests, either during the year under investigation or in years prior ("Title IX Ruling Received" 17).

Brooklyn is now threatening to eliminate the athletic department. This action might not be retribution for being found in violation of Title IX, but it will likely be interpreted to be. The school had agreed to meet OCR compliance assurances by September. The school will honor existing scholarships, but must cut $5.5 million from its $70 million budget (Herwig 2C).

Has Brooklyn found a new way to cope with Title IX? Can an institution just eliminate the problem or does the "solution" leave the school vulnerable to damage lawsuits by female athletes? The Franklin decision has made a wider range of remedies available to Title IX plaintiffs. However, it leaves a number of questions unanswered. These include whether monetary damages may be claimed for unintentional violations of Title IX, what types of alleged discriminatory actions will be considered to be intentional for the purposes of recovering monetary damages, and whether punitive as well as compensatory damages may be awarded (Scott, Semo 16). The Supreme Court has played an important role in shaping the interpretation of Title IX. Will the Supreme Court continue to have a role in Title IX debate? The answer to that question could depend on the development of a definition of Title IX which leaves no room for mistake in interpretation on the part of Federally funded institutions.
Chapter 2
Current Status of Title IX

Gender equity has received considerable attention in the past year. One of the major reasons is that many schools are facing harsh economic times and being forced to make budget cuts. Athletic programs have not been immune to these problems. Schools are being forced to cut sports from athletics programs. This is when many schools get themselves in trouble. The current situation has led the Education Department to publish a statement specifically stating what colleges and universities must do in order to satisfy Title IX requirements. In early 1992, the NCAA released the findings of its gender-equity study designed to examine where member institutions stand in regards to gender equity. The results suggest some institutions have “dragged their feet” to meet Title IX regulations.

In March, 1992, the NCAA released the findings of its gender equity study. The study was authorized by the NCAA Council in response to a request by the National Association of Collegiate Women Athletic Administrators. The study was designed to analyze expenditures and opportunities for women’s and men’s athletics programs by institutions in each of the NCAA’s membership divisions.

Of its 847 members, 646, or more than 75 percent, returned usable survey responses relating to the 1990-91 academic year. Response rates varied from more than 92 percent for Division I-A to about 69 percent in Division III.

The following numbers were reported in the March 11, 1992, issue of NCAA News and the March 18, 1992, issue of Chronicle of Higher Education.

The study showed the number of male participants in intercollegiate athletics programs exceeded female participants on average by 2.24 to 1 in Division I, 2.11 to 1 in Division II, and 1.87 to 1 in Division III. This disparity is largely due to football and the lack of an equivalent sport for women and tend to skew the numbers.

Football is not treated separately from other parts of the athletic program. Certain special requirements of particular sports, namely football, are recognized as nondiscriminatory differences justifying a lack of equivalency in such areas as medical services, equipment, facilities required for competition, maintenance of those facilities, special event management needs related to crowd size
and special publicity requirements.

With respect to the accommodation of interest and abilities requirement of Title IX, offering football ordinarily increases the number of participation opportunities provided to men and therefore also is likely to accommodate equivalently their athletics interests and abilities ("NCAA News 20).

In regards to operating expenses, the average for men's sports exceeded those for women's sports 3.42 to 1, which exceeded the male/female participant ratio of 2.28 to 1; in Division II, the ratio was 2.15 to 1, close to the 2.11 to 1 ratio of male to female participants. In Division III, the operating expense ratio was 2.00 to 1, slightly greater than the male/female participant ratio of 1.87 to 1.

However, a review of average operating expenses by individual sports in all divisions showed that to a major extent, non-revenue-producing sports were on average comparably funded between the men's and women's programs. The average recruiting expenses for male student-athletes exceeded those for female student-athletes by a 4.82 to 1 ratio in Division I. For Division II, the ratio was 3.08 to 1. These data were not collected in Division III.

The NCAA's study also examined coaches in all three divisions. In Division I, the average percentage of male coaches for men's teams was 98.6 percent as opposed to 44.8 percent of coaches for women's teams were female. This information was not asked for in any other divisions.

The average Division I ratio of participants to full- and part-time coaches was slightly better for women's teams than for men's teams: 11.56:1 for women and 12.29:1 for men. The average Division I coaching expense per participant favored the men's programs - $2,501 for men and $2,040 for women. The average Division I school paid its male assistant coaches a total of $353,339, compared to $78,131 for its female coaches, or 4 1/2 times as much.

In Division II, 26.4 percent of head coaches for men's sports received salaries in excess of $35,000, whereas only 11.1 percent of head coaches in women's sports earned similar salaries. The average data reported in Division III disclosed a narrower difference: 30.5 percent of male head coaches received salaries of $31,000 or higher, compared with 19.0 percent for female coaches.
However, the survey did find that the average NCAA institution met the law’s requirement of female athletes must receive scholarship support in proportion to their representation on teams. Female athletes at the 253 Division I schools that responded received 30.5 percent of the athletic-scholarship money distributed at those colleges, and made up 30.9 percent of the number of athletes. In Division II, women received 31.7 percent of the scholarship aid and made up 32.2 percent of the athletes.

Perhaps the biggest contribution to the debate about Title IX and its likeliest impact on future actions regarding the federal law is the great discrepancy it shows between the rates at which men and women are found on athletic teams and in the overall student enrollment at their colleges. Many sports officials have argued that their main obligation under Title IX is to provide an equal amount of scholarship money to both sexes in proportion to the number of participants of each sex.

However, women advocates have argued that while they may provide equal scholarship money, they have ignored their responsibility of ensuring that the number of participants in athletics is proportionate to their representation in the student body. Using that measurement, colleges fall quite short. The survey shows that female students slightly outnumber males, while male athletes outnumber female athletes by nearly 70 percent to 30 percent (Lederman, “Men Get 70%” A46).

The Education Department civil-rights office recently released a statement clarifying its requirement that colleges provide equitable opportunities for women. A memorandum prepared for college officials said:

One measurement for compliance with this requirement is whether the rate of participation for male and female students in the athletics programs is substantially proportionate to their respective enrollments as full-time undergraduate students (Lederman, “Men Get 70%” A46).

When a college falls short of that mark, the memo said, it must show a “history or continuing practice of program expansion” for the underrepresented sex or prove the college has fulfilled the interests and abilities of its students (Lederman, “Men Get 70%” A46).

Gender equity has also caught the attention of the United States Congress. On April 9, 1992, the NCAA’s gender-equity study was discussed in a hearing of the U.S. House Subcommittee on Commerce, Consumer Protection and Competitiveness. The hearing was the fourth in a series of comprehensive hearings by the subcommittee on issues relating to college athletics (“NCAA Panel
NCAA Executive Director Richard D. Shultz, NCAA Assistant Executive Director of Administration Merrily Dean Baker, and Big Ten Assistant Commissioner Phyllis L. Howlett discussed gender equity within the NCAA ("NCAA Panel Address Gender Equity" 3).

Shultz told the Committee what steps the Association has taken to provide opportunities for women, and Howlett described the results of the gender-equity survey which was released March 11 ("NCAA Panel Address Gender Equity" 3).

A second panel testifying before the subcommittee included Ellen Vargyas, senior counsel for education and employment at the National Women’s Law Center; Christine Grant, women’s athletics director at the University of Iowa; Vivian Fuller, associate director of intercollegiate athletics at Indiana University of Pennsylvania; and Lee McElroy, director of athletics at California State University, Sacramento ("NCAA Panel Address Gender Equity" 3).

This group of panelists addressed the disparity between the athletics participation rate for women and overall college enrollment. They claimed that women’s participation numbers are lower not because of a lack of interest but rather because of a lack of opportunity ("NCAA Panel Address Gender Equity" 3).

Rep. Cardiss Collins, D-Ill. and Rep. Tom McMillen, D-Maryland, criticized the NCAA, saying its member institutions have not achieved gender equity and that Congress may need to take action if institutions do not end discrimination in athletics on their own ("NCAA Panel Address Gender Equity" 3).

In response to Collins’ question of how the NCAA could help assure gender equity, the panel agreed that gender equity should be a part of any certification program the NCAA develops. Vargyas recommended the NCAA “death penalty” for Title IX violations, while Fuller suggested disqualification from championship competition as a sanction ("NCAA Panel Address Gender Equity" 3).

Also released at the hearings was the General Accounting Office’s (GAO) own gender-equity study which was completed in response to a request by Collins. The GAO presented its findings from it report “Intercollegiate Athletics: Revenues and Expenses, Gender and Minority Profiles, and Compensation in Athletic Departments.” The report covered a wide range of questions.
Among the findings, it determined that women athletics directors and women basketball coaches usually have lower earnings than men in comparable positions and that compensation for personnel at historically black institutions (almost all of whom are minorities) is usually lower than that offered at all institutions ("NCAA Panel Address Gender Equity" 3).

The NCAA gender-equity study has shown that women have not been receiving equal opportunities in intercollegiate athletics. Congress has shown an increasing interest in college athletics and is prepared to take action that will ensure that the trend of inequality no longer continues. Colleges and universities have been narrowly defining Title IX in claiming adherence. But with the increasing interest of Title IX from several different bodies, universities will no longer be able to hide behind any excuses of non-compliance.
Title IX has evolved from a bill that had little enforcement to one of the hottest issues in college athletics. So what is next? Will Title IX be forgotten again? The recent actions taken by some of the most influential groups in college athletics almost ensure that will not happen.

In March, 1992, a press conference was called to announce that some of the most powerful and respected female administrators in intercollegiate sports were leaving the college ranks to form a national lobbying group (Lederman, "Advocates for Women's Sports" A33).

Donna A. Lopiano, director of women's athletics at the University of Texas at Austin, was introduced as the executive director of the Women's Sports Foundation. She said that the women's sports movement needed a new approach because the Education Department's Office for Civil Rights, which is responsible for enforcing Title IX has done little since the late 1970's (Lederman, "Advocates for Women's Sports" A34).

"During the first four or five years of Title IX, there was a threat of OCR's really coming down on colleges and universities with the loss of federal funds," Ms. Lopiano said. "That threat never materialized. Colleges have grown complacent with the lack of enforcement of the law, and they have not continued to try to make progress" (Lederman, "Advocates for Women's Sports" A34).

Although most of the panelist agreed that the civil-rights office had begun to show signs of movement on Title IX, they felt it cannot be counted on to enforce the law. They said the civil-rights office should begin a much more active enforcement campaign, like the one it pursued when Title IX was established in 1972. Peggy Kellers, executive director of the National Association of Girls and Women in Sports, said the Education Department should require colleges to meet certain standards by certain dates, and then conduct regular compliance reviews to insure that they were meeting the requirements (Lederman, "Advocates for Women's Sports" A34).

In response to its gender-equity study, the NCAA has appointed a 15-member task force to study the issue within the NCAA. Executive Director Richard Shultz said that it was important to appoint a diverse committee "that would include people within the membership who represent divergent groups - from excellent athletics administrators to strong women's rights advocates." Shultz has suggested that the task force explore alternative funding sources, such as state
appropriations for public institutions or donations for private schools ("Howlett, Whalen Named Cochairs" 1).

The task force, which is chaired by Phyllis Howlett, assistant director of the Big Ten Conference, and James H. Whalen, president of Ithaca College, held a conference call on May 29 to set an agenda for the first meeting in July. That meeting will cover four broad topics: the question of whether Title IX and gender equity are different concepts; the identification and correction of any NCAA practices and legislation that hinder a member institution from complying with Federal law with regard to gender equity, especially any specific problems institutions have had in this area; the establishment of acceptable gender-equity standards and suggestions on how to meet those standards; and how to provide assistance to member institutions for accommodating gender-equity recommendations adopted by the NCAA, including use of the certification process, printed matter, and workshops ("Howlett, Whalen Named Cochairs" 1).

The committee agreed that if appropriate legislation or resolutions are agreed upon at the July meeting, they could be recommended to the NCAA Council or Presidents Commission for submission to the 1993 Convention. If legislative proposals are not achieved, the committee would consider presenting its deliberations to Convention delegates as a special report. The task force has asked for comments and suggestions from its member institutions to discuss at the July meeting ("Howlett, Whalen Named Cochairs" 1).

The Big Ten Conference, one of the most powerful conferences in the country, passed legislation in June, 1992, that all schools increase women's athletics to 40 percent of all sports by 1997. The Council of Presidents voted unanimously to accept the recommendation from the conferences Gender Equity Task Force which approved the 60-40 goal in May by a 10-1 vote ("Big Ten Moves to Equalize Athletics" 25).

Conference-wide, women's teams account for approximately the same split except for Iowa which already has a 60-40 split ("Big Ten Moves Closer to Equality" C6).

Universities must decide among limiting squad sizes for men's teams, cutting recruitment and scholarships, restricting travel, and slashing administrative costs. Coaches and athletic directors have been asked to consider dropping room-and-board subsidies ("Big Ten Moves to Equalize Athletics" 25).
Each college must decide individually on how to meet the 60-40 split without crippling men’s sports and competitiveness at a national level. Plans on how to reach that goal must be turned in to the conference office by the end of 1993 ("Big Ten Moves to Equalize Athletics" 25).

Andrea Seger, director of women’s athletics at Ball State University, feels it will take time for administrators to learn about gender equity. In an interview on April 20, she shared these thoughts.

“Some schools are ignorant on what can and can’t be done,” she said. “Women’s sports are given about 1/3 of the resources but receives half of the cuts. Schools can’t cut one women’s sport and one’s men’s sport and call that equal. The NCAA has been proactive and needs to continue to be.”

Ball State has a rather unique situation because women’s athletics have their own department and their own voice which helps educate university officials on gender equity. “Having a direct line to the president makes it a little easier to gain attention for women’s athletics,” Seger said.

So what is the next step for gender equity? The Big Ten’s regulation of a 60-40 split between men’s and women’s sports may lead to national legislation requiring the same. The NCAA has appointed a special task force to investigate possible solutions and possible legislation to ensure gender equity.

Congress has poised itself to get involved with the issue. It was just a few years ago Congress threatened to pass federal regulations for college athletics. The NCAA did not want this to happen so they took action and gave control of the NCAA to the university presidents. However, Congress passed legislation requiring universities to publish graduation rates. A similar situation could develop with gender equity. Schools may be forced to publish information on how they are fulfilling Title IX requirements.

With the formation of a national lobbying group, the expressed interest of Congress, and the formation of a NCAA special task force, the issue of gender equity will not die. Colleges and universities will become more accountable for not meeting Title IX requirements. A clearer definition of Title IX must be developed so schools will understand the requirements they must meet. Schools are currently meeting the Title IX requirements they feel they must, but in actuality are not meeting the full requirements of the statute. Title IX has come full circle from an almost
nonexistent regulation to the hottest issue in college athletics. Colleges and universities have made strides but still have not reached full equity. However, women's sports advocates, administrators, Congress, and the NCAA are making strides to ensure that women not only receive scholarship funds in proportion to participation rates, but are given equal participation opportunities.
Works Consulted


“NCAA Panel Addresses Gender Equity.” NCAA News 29 April 15, 1992: 3.

Scott, Michael and Semo, Judith Jurin. “Damages to be Allowed in Title IX.” NCAA News 29 March 4, 1992: 1, 16.


“Title IX Ruling Received by Brooklyn.” NCAA News 29 February 26, 1992: 14, 17.
