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'Americans & Their Games' (Part IV-C) *Sports and the Quest for Women's Rights Post-Title IX*



Few legislative acts in American history changed American culture as dramatically as Title IX. Although several 1960s era institutes concerning women in sports sought to increase female involvement in athletics, *nothing* changed the American athletic landscape as dramatically as Title IX.

Prior to its passage, only 300,000 girls played high school sports; fifty years later that number was 3.4 million. Prior to its passage, only 32,000 women played intercollegiate sports; fifty years later that number was 221,000. Overall U.S. population growth accounted for a small portion of that increase; the

gradual advancement of girls and women's sports programming accounted for another modest slice of the increase. But the overwhelming portion of that tremendous growth in female sporting activity at all competitive levels and within all age groups resulted from the passage of Title IX.

Within the overall context of women's sports we've been reviewing these past two weeks, it was as if someone flicked a switch and the world changed.

What's Title IX?

It reads quite simply:

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. [1]

Actually, without being too technical (lawyers reading this can correct me if I get the technicalities a bit skewed), Title IX is not a law unto itself. A "title", sometimes called a clause, is a large portion or subset of an act. Title IX is a clause – also called the *Patsy Takemoto Mink Equal Opportunity in Education Act* – of the 1972 amendments to the 1965 Higher Education Act. Title IV of the latter created the entire federal financial aid system. The 1972 amendments were meant to clarify how that aid was processed and to ensure that it was equally distributed. It also amended the Fair Labor Standards Act by expanding who was included under the Equal Pay Act.

So, in short, the 1972 amendments to the Higher Education Act of 1965 were designed to ensure that its benefits were distributed equitably. Title IX, therefore, is an equality clause. In this instance, a clause designed to protect equal access to federal benefits regardless of sex.



As Second Wave feminism gained energy during the 1970s it inspired women to pushback against discrimination. Title IX is named after U.S. Rep. Patsy Mink (D-HI), who was the first woman of color and the first Asian-American woman elected to Congress. [2] She co-sponsored the bill with U.S. Rep. Edith Green (D-OR) and U.S. Sen. Birch Bayh (D-IN). But Title IX's genesis lay in the work of Bernice Sandler, who is sometimes called the "Godmother of Title IX". Sandler once said she was originally ambivalent about the women's movement, but she became one of its heroines. Graduating with an MS in psychology from CCNY in 1951, Sandler worked at various jobs while raising a family. After returning to college and earning a doctorate in psychology in 1969, she could not find a permanent

position in academia. Male colleagues told her that she “came on too strong for a woman” and that she was only “a housewife who went back to school” and would not take her profession seriously. Stinging from these rebuffs, Sandler set out to battle sex discrimination in higher education. She wrote widely about sexual discrimination and peer harassment. She coined the phrases “gang rape” and “chilly campus climate”. Building allies in Congress and elsewhere, her work documenting “the arbitrary limits and sexist standards” holding women back in academia and the professions led to the passage of Title IX. [3]

A common misperception is that Title IX is only about sports.

It isn't.



In fact, Title IX's impact upon women and sports might be the ultimate example of legislative unintended consequences, because its main focus was sex discrimination. It prohibits all discrimination based on sex in any organization receiving federal funding. In recent decades, it's primary deployment has been against sexual discrimination, sexual harassment and sexual assault on college campuses. It also protects the rights of transgender and pregnant students from discrimination. [4] Exploring those

issues would be another study, but we're interested in its impact on women's sports.

How did those “unintended consequences” occur?

Women's sports advocates noting Title IX's prohibition of any discrimination based upon sex looked at the unequal allocation of resources dedicated to women's sports versus men's sports. They called foul. In order to rectify that imbalance, rather quickly given the usual glacial pace of legislative and legal redress, a rubric emerged for gauging whether or not women's sports programs were being discriminated against within the context of Title IX's prohibitions. In basic terms, the rubric measures an institution receiving federal funds' compliance with Title IX regarding athletic opportunities in three categories: participation, scholarships, and “other” benefits, which include everything from uniforms, per diems (traveling team food allowances, for example), supplies, equipment, access to facilities, etc. “Participation” means that there must be equal opportunity for both men and women to partake in sports programs. Similarly, scholarship budgets (not individual scholarships) must be equal. [5]

TITLE IX

There are three tests for compliance with these requirements. First, “substantial proportionality”, which means that men’s and women’s participation in sports must be reasonably equal to their representation in the student body. Simplistically, if 48% of the students are women, then 48% of the student-athletes should be women. Two problems immediately arise that have bedeviled Title IX compliance from the outset: a) there is no women’s sport with a roster size as large as that for men’s football and b) it has been alleged that women are not as interested in sports as men.

Regarding football, in 1974 U.S. Sen John Tower (R-TX) proposed an amendment exempting revenue-producing sports, i.e. football, from Title IX’s provisions. It was rejected. Similarly, the Javits Amendment (named after U.S. Sen. Jacob Javits (R-NY) was passed in 1974 requiring that legitimate and justifiable discrepancies for nongender-related activities be taken into account; e.g. sports like football and ice hockey whose equipment requirements are extensive should be accommodated even if they skew the balance of resources. [6]

From time-to-time other attempts to exclude football have been proposed, but these encountered opposition by women’s groups. As a result, we’ve seen the adoption of sports such as competitive cheer and others with larger rosters to try balance the equation. Another, costlier but simpler solution, is to sponsor more women’s sports. As for women’s interest in sports, there is only ambiguous empirical data to support the macro claim that men have greater interest.

Which has led to the second and third tests for compliance. An institution can be found compliant if it has a demonstrated history and continued practice of expanding programs for women (see the idea of adding more sports noted above). Or, an institution can be found compliant if it can demonstrate that it has fully and effectively accommodated the interests of its students. This has led to surveying students about their interest in athletic participation and then matching those survey results with actual athletic participation on campus. So, if survey research on campus indicates that 41% of women want to participate and some reasonable approximation of 41% do participate, then an institution is compliant. As one might expect, there is a swirl of controversy and debate around these measures.

Sometime, should we ever meet and you want to engage me in a conversation about organizational hypocrisy, ask me about the National Collegiate Athletic Association – the NCAA.

Be prepared to chat for a while.

In any event, in 1976 the NCAA sued to challenge the legality of Title IX saying it was not aware of athletic programs receiving federal assistance. The suit was dismissed in 1978. [7] It did, however, open the door for a lawsuit from Grove City College in 1984.

But, first, what was Title IX's impact upon women's sports in the 1970s?



At first, Title IX gave a boost to the Association for Intercollegiate Athletics for Women. It sponsored women's championships in basketball and other sports. Operating under the AIAW banner, the *Mighty Macs* of Immaculata College in Philadelphia were the first women's basketball powerhouse. They won three consecutive national championships in 1972, '73, and '74. They lost in the finals the next two years. [8] But the inevitable rise of major college powers was hinted at in 1974 when the University of Tennessee hired Pat Summit as its women's basketball coach and UCLA

awarded the first ever full scholarship to a woman athlete, basketballer Ann Meyers. And, as the decade ended, for the first time ever the proportion of women enrolling in higher education exceeded men's enrollment, which portended all sorts of complications for compliance testing proportionality. [9]



KATHERINE KNOX HASTINGS

Closer to home, reader Wally Knox shared with me his sister Katherine Knox Hastings's Title IX story. In the late 1960s, she was an outstanding club swimmer, but when her parents moved her new high school did not have a pool and there were limited or no opportunities to continue swimming. She put swimming behind and enrolled at the University of Michigan. With the passage of Title IX, Michigan added a women's swimming team. Katharine decided to revive her interest in competitive swimming. She became a Division I All-American and captain of Michigan's Big Ten championship team in 1975. A member of Erie's Aquatics Hall of Fame, in 2000 she was named one of Erie's top one hundred women athletes. [10]

All because of the opportunity Title IX created.



Setting Title IX aside for the moment, the greatest advancements in women's sports during the 1970s occurred in professional women's tennis. One person is responsible for that – Billie Jean King. Her greatness as a tennis player can't be disputed. She won 39 major titles playing singles and doubles. She was (and *is*) an even greater advocate for women's rights. After turning professional in 1968, she was the first woman athlete to win over \$100,000 in a season (1971). In her fabled "Battle of the Sexes" with Bobby Riggs she not only proved a woman could beat a man, but the match set records for the largest prize money and audience. King was relentless in her drive to improve women's rights in the sporting world. She formed a separate women's tour – the Virginia Slims Circuit which became the Women's Tennis Association Tour. Later she developed other professional leagues for women and fought for equality in tournament prizes and resources for women. Later, after her tennis career ended, she became a vocal advocate for women's rights and girls' sports. In some ways, she was one-woman social movement. [11]

While progress was being made, some sought to thwart Title IX. One was Grove City College, which in *Grove City v. Bell* argued that Title IX applies only to programs receiving federal funding. Grove City argued Title IX did not apply to the entire institution or to the entire athletic program. The Supreme Court concurred, ruling in favor of Grove City College. [12] It literally took an act of Congress to reverse that decision, which the U.S. Congress did in 1988 when it overrode President Reagan's veto to pass the *Civil Rights Restoration Act* restoring the protections nullified by the Grove City case. [13] In 1988, in *Haffer v. Temple*, a federal judge ruled in favor of women students suing for discrimination in budgets, scholarships, and participation rate. [14] Although it is beyond the scope of this *Note*, between 1995 and 2011 a number of cases extended Title IX's control of sexual harassment, sexual discrimination, and sexual assault on campuses.

Although it started slowly, the growth of women's sports ignited in the late-1970s and became a blaze in the 1980s. Running down the rolodex of the decade's high (and low) points reveals women's sports arrival as a major factor in American culture. Let's begin with the low-point. Proving the adage that "if you can't beat them, join them", the NCAA began sponsorship of women's basketball in 1982. As the poet Dana Gioia said, "Money. You don't know where it's been,/but you put it where your mouth is./And it talks." [15] He might have added, 'and people listen'. Listening, the NCAA money put an end to the AIAW, in some ways justifying the fears of those 1930s physical educators who worried elite athletics would undermine sports for all.



The NCAA aside, 1980s highlighted women's sports bright future, forever slaying the Myth of Female Frailty. In 1982 the star-crossed Mary Decker became the first woman to run a sub-4:30 mile, Kathy Rude won the 24 Hours at Daytona race becoming the first woman ever to win a professional road race, and Louisiana Tech won the first ever NCAA women's basketball championship. Its star was Kim Mulkey, who later won national championships as an assistant coach at her alma mater and as a head coach at Baylor and Louisiana State Universities. She was the first woman to win as both a player and a coach. In 1984, the women's marathon was added as an Olympic event. You'll recall that it was thought a woman couldn't run that far before Katharine Switzer completed the Boston Marathon in 1967. In 1984, American Joan Benoit won the first women's Olympic marathon. [16]



In 1985, the United States Women's National Soccer Team was founded. In 1987 and 1989, Pat Summit's Tennessee Volunteers won the first two of their eight women's basketball NCAA D-I national championships. In 1988, Erie's own Mercyhurst College's women's soccer team competed in the first ever NCAA D-II women's Final Four. With Matt Whelan assisting, I had the honor to be their coach. The decade ended with the magnificent Florence Joyner Griffith – *FloJo* – setting world records in the 100 and 200 meter dashes at the 1988 Olympics in Seoul, South Korea. [17]



As the 1980s turned into the 1990s, the women's rights movement morphed from Second Wave feminism, which, although much remained to be done, had made great gains in women's education, Title IX in sports, career opportunities in the professions, equal employment and equal pay, to Third Wave feminism. Third Wave feminism, inspired by Anita Hill's experience during Clarence Thomas' Supreme Court confirmation hearings, focused on tackling problems that remained, such as sexual harassment in the workplace and the "glass ceiling" – the shortage of women in positions of power. Third Wave feminists also worked to diversify the women's movement from its essentially white and middle-class history to focus on issues of race, class, gender, and sexual identity. The concept was known as

intersectionality – how all these factors intertwined to reinforce old stereotypes and old exclusions. [18]

Several legal cases during the 1990s impacted Title IX, most of which addressed issues of sexual harassment and sexual assault. However, one reinforced Title IX's proportionality compliance test when Brown University was ordered to reinstate programs after claiming women weren't as interested as men in athletic participation. The decision was later partially reversed. [19] This case emerged out of 1994's controversial ***Equity in Athletics Disclosure Act*** (EADA) which required educational institutions receiving Title IV federal financial aid to prepare annual reports on budgets, scholarships, salaries, staffing and overall athletic participation. [20] The EADA continues to drive the increasing parity between men's and women's athletic programs.



While all of this was going on, women increased their competitive participation and success. In 1991, the Olympic Organizing Committee decreed that all new sports added to the Olympics must include women's sports. Also in 1991, the U.S. Women's National Soccer Team won the first ever Women's World Cup.

In 1992, major league baseball lifted its 40 year old ban against signing women to contracts and in 1993 Sherry Davis was hired by the San Francisco Giants as the first ever woman public address announcer. Also, in 1993, Julie Krone, generally regarded as the greatest woman jockey ever, became the first woman to win a Triple Crown race – the Belmont Stakes. In 1996, women's soccer and softball were added to the Olympics and the U.S. women's teams won both. [21]



Although a smaller women's basketball had been in use since the mid-80s, in a small but not insignificant move towards parity in athletic equipment, Spaulding produced the first baseball/softball glove to fit a woman's hand. In 1997, the most successful women's professional league ever was founded – the Women's National Basketball Association – the **WNBA**. Nancy Lieberman of the Phoenix Mercury was its first great star. [22] In 1999, two events occurred that buried, if it still needed burying, the myth of Female Frailty. Tori Murden became the first woman to row solo across the Atlantic Ocean. It is beyond

me why anyone would want to do that, but if there were any lingering doubts about women's ability to compete in physically demanding sports, Murden sank them (thankfully, she herself did not). [23]



The other occurred on July 10, 1999 at the Rose Bowl in Pasadena, California as the U.S. women yet again won the Women's Soccer World Cup defeating China 5-4 in a penalty shot victory as Brandi Chastain scored the winning goal. [24] The image of the shirtless, sports-bra clad, fist-clenched, exultant Chastain celebrating victory has become one of the iconic sporting images in

all of American sporting history, male or female. Two things about Chastain and her indelible, triumphant image. Revealing the lingering and latent sexism of the sporting press, she was criticized as an exhibitionist for doing what male soccer players do all the time – strip off their shirts in triumph. She was accused of cunningly seeking commercial opportunity, to which I say BS. There are few things as emotionally satisfying as athletic victory. Her heart was beating 200 beats per minute, her body was drenched with adrenaline and suffused with endorphins – she was literally out-of-her-mind with, as in the old **Wide World of Sports** slogan, “The thrill of victory...” Chastain's image is the ultimate image of sporting joy.

It also, as the century ended, completed the circle begun by Suzanne Lenglen, who refused to wear the 19th century confining women's clothing inhibiting her ability to play tennis. From Lenglen to Helen Wills Moody to women's basketball players to women swimmers to fill in the blanks to Chastain in exultant victory, you can trace the evolution of women's rights and women in sports through the evolution of women's clothing and women's sporting apparel. In Chastain's image you see woman liberated to be all she can be and equally free to revel in it.

Women's sports in the 21st century has continued its upward arc, for just as Fourth Wave feminism sought equal pay for equal work, fought against sexual harassment and sexual assault, so, too, have women athletes. Regarding the latter, we've seen the egregious case of Larry Nasser at Michigan State abusing student athletes entrusted to his care. On a much more positive note, in 2022 the U.S. national women's soccer team won its suit for compensation equal to the men's when it settled the dispute with the U.S. Soccer Federation, which agreed to distribute \$24 million among the players to redress previous inequities. It follows a precedent set as long ago as 2005 when the women's winner of the New York City Marathon was paid more than the men's winner -- \$130,000 to \$100,000 or, more recently, 2015 when tickets to the Women's Final at the U.S. Open tennis tournament sold out before the men's. Unfortunately, Serena Williams lost that final to Italy's Roberta Vinci. [25]

In an ironic legal twist, perhaps indicating American sporting society has come full-circle, in 2021 the Clemson University **men's** track and field and cross-country teams won a historic settlement for their claim of discrimination based on Title IX. When their teams were cut by the University as a result of the

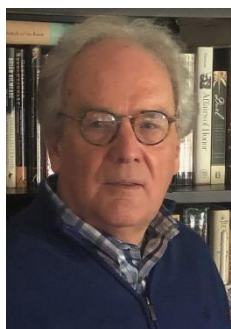
COVID-19 pandemic, because there were nearly an equal number of men and women athletes participating in sports at Clemson in 2019-20, they argued that the cuts meant the university was no longer providing an equitable number of opportunities under the law. [26]



Among women’s athletic triumphs in the early 21st century, Danica Patrick was the first woman to win an IndyCarSeries race, the Williams sisters – Venus and Serena – dominated women’s tennis, the UConn women’s basketball dynasty captured the public imagination, and at the 2012 London Olympics all sports had women competitors and the U.S. Olympic team had

more women than men – 269-261. Other “firsts” included Michelle Roberts as Executive Director of the NBA (men’s) players association, Becky Hammon the first woman coach in the NBA, Kim Ng general manager of major league baseball’s Miami Marlins.[27] Finally, in 2023 Caitlin Clark, Angel Reese and the LSU Tigers and Iowa Hawkeye’s Women’s Basketball Final Four encounter drew more media attention and fan fever than the men’s Final Four. The championship final was the highest rated TV women’s basketball game ever and the highest rated ESPN+ streaming event ever, male or female. [28]

So, after almost two centuries of progress (most of which has occurred in the past 50 years), tracing the arc of the women’s rights movement through the lens of sports, we see another example of those first excluded from all the benefits of America’s foundational values gaining their full rights by appealing to those very values, those truths we hold to be self-evident as declared in the ***Declaration of Independence*** as amended by the women’s 1848 ***Declaration of Rights and Sentiments*** – “That all men and *women* are created equal...”.



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 “Bernice Sandler ‘God Bless Title IX’” at **Title IX Timeline/ASU** available at [Title IX Timeline/ASU | Timetoast timelines](#) accessed August 12, 2023.
 “No Means No” by **Mad Bird Studio** available at **Wolverine Times** available at [Improving Sex Education – The Wolverine Times \(whspawprint.com\)](#) accessed August 12, 2023.
 “Mighty Macs” in **The Washington Post** (March 13, 2019) available at [Women’s college basketball wasn’t always dominated by big schools. First came the Mighty Macs. - The Washington Post](#) accessed August 12, 2023.
 “BJK headshot 2011 5x7 300dpi.jpg” at **Wikimedia Commons** available at [File:BJK headshot 2011 5x7 300dpi.jpg - Wikimedia Commons](#) accessed August 12, 2023.
 “Katherine Knox Hastings” at the **Erie County Aquatics Hall of Fame** available at [Past Inductees Information – Erie County Aquatic Hall of Fame \(ecahf.org\)](#) accessed August 2, 2023.
 “Mary Decker” at **Wikimedia Commons** available at [File:Zola Budd, Mary Decker, Maricica Puică 1984.jpg - Wikimedia Commons](#) accessed August 12, 2023.
 “1988 Mercyhurst College Women’s Soccer Team, Miami Beach, FL” personal collection of Andrew Roth.
 “I Believe Anita Hill’ Button.jpg” at **Wikimedia Commons** available at [File:"I Believe Anita Hill" Button.jpg - Wikimedia Commons](#) accessed August 12, 2023 .
 “Julie Krone riding Halfbridled at 2003 Breeder’s Cup.jpg” at **Wikimedia Commons** available at [File:Julie Krone riding Halfbridled at 2003 Breeders' cup.jpg - Wikimedia Commons](#) accessed August 12, 2023.
 “Brandi Chastain” at **Los Angeles Times** available at [Brandi Chastain - Bing images](#) accessed August 12, 2023.
 “Caitlin Clark” at **Wikimedia Commons** available at [File:Caitlin Clark Big Ten tournament \(cropped\).jpg - Wikimedia Commons](#) accessed August 12, 2023.
 “Angel Reese” at **Bing Images** available at [Angel Reese - Bing images](#) accessed August 12, 2023.

End Notes

1. “Title IX of the Education Amendments of 1972” at **U.S. Department of Health and Human Services** available at [Title IX Education Amendments | HHS.gov](#) accessed August 2, 2023.
2. Dym, Zoe, “Title IX champion Patsy Mink honored locally and nationally on 50th anniversary” at **Hawaii Public Radio** available at [Title IX champion Patsy Mink honored locally and nationally on 50th anniversary | Hawai'i Public Radio \(hawaiipublicradio.org\)](#) accessed August 2, 2023.
3. “Celebrating the Life and Work of Bernice Sandler” at **The National Organization of Women (NOW)** available at [Celebrating The Life and Work of Bernice Sandler - National Organization for Women \(now.org\)](#); Goldman, Tom and Bill Chappell, “How Bernice Sandler, ‘Godmother of Title IX.’ Achieved Landmark Discrimination Ban” at **NPR** available at [How Bernice Sandler, 'Godmother Of Title IX,' Achieved Landmark Discrimination Ban : NPR](#); Seelye, Katharine Q., “Bernice Sandler, ‘Godmother of Title IX,’ Dies at 90”, **The New York Times** (January 8, 2019) available at [Bernice Sandler, 'Godmother of Title IX,' Dies at 90 - The New York Times \(nytimes.com\)](#). All accessed August 2, 2023.
4. Cf. “Title IX and Sex Discrimination” at **U.S. Department of Education** available at [Title IX and Sex Discrimination \(ed.gov\)](#); “U.S. Department of Education Confirms Title IX Protects Students from Discrimination Based on Sexual Orientation and Gender Identity” at **U.S. Department of Education** available at [U.S. Department of Education Confirms Title IX Protects Students from Discrimination Based on Sexual Orientation and Gender Identity | U.S. Department of Education](#) both accessed August 12, 2023.
5. “Title IX Legal Manual” at **Civil Rights Division of the U.S. Department of Justice** available at [Civil Rights Division | Title IX \(justice.gov\)](#) accessed August 12, 2023.
6. “The Tower Amendment” at **Title IX: The Evolution of Women’s Rights in Education and Sports** available at [The Tower Amendment - TITLE IX: The Evolution of Women's Rights in Education and Sports \(weebly.com\)](#) and for the Javits Amendment see Lindsay Schnell and Rachel Axon “Title IX aimed to get women into grad schools. Over 50

- years, it shaped their role in sports” at **USAToday** (Dec. 15, 2022) available at [How Title IX changed college sports for women over the past 50 years \(usatoday.com\)](#) both accessed August 12, 2023.
7. “History of Title IX” at **Women’s Sports Foundation** available at [History of Title IX - Women’s Sports Foundation \(womenssportsfoundation.org\)](#) accessed August 12, 2023.
 8. Bowen, Fred. “Women’s college basketball wasn’t always dominated by big schools. First came the Mighty Macs” in **The Washington Post** (March 13, 2019) available at [Women’s college basketball wasn’t always dominated by big schools. First came the Mighty Macs. - The Washington Post](#) accessed August 12, 2023.
 9. Leukhina, Oksana and Amy Smaldone, “Why Do Women Outnumber Men in College Enrollment” at **Federal Reserve Bank of St. Louis** available at [Why Do Women Outnumber Men in College Enrollment? \(stlouisfed.org\)](#) accessed August 12, 2023.
 10. Personal correspondence with reader Wally Knox re his sister Katharine Knox Hastings; cf. also her plaque in the **Erie County Aquatics Hall of Fame** available at [Past Inductees Information — Erie County Aquatic Hall of Fame \(ecahf.org\)](#) accessed August 2, 2023.
 11. Cf. “Billie Jean King”, in **The Encyclopedia Britannica** available at [Billie Jean King | Biography, Titles, & Facts | Britannica](#); Mariana Brandman, “Billie Jean King” at **National Women’s History Museum** available at [Billie Jean King | Biography, Titles, & Facts | Britannica](#); “Battle of the Sexes” in **Wikipedia, the free encyclopedia** available at [Battle of the Sexes \(tennis\) - Wikipedia](#); and Adam Lincoln, “50 Years Ago Today: Virginia Slims Circuit Kicks Off” at **WTATour** available at [50 Years Ago Today: Virginia Slims Circuit Kicks Off \(wtatennis.com\)](#) all accessed August 2, 2023.
 12. “Grove City College v. Bell – Facts and Case Summary” at **United States Courts** available at [Grove City College v. Bell - Facts and Case Summary | United States Courts \(uscourts.gov\)](#) accessed August 12, 2023.
 13. Villalobos, P. Michael, “The Civil Rights Restoration Act of 1987: Revitalization of Title IX” in **Marquette Sports Law Review** available at [The Civil Rights Restoration Act of 1987: Revitalization of Title IX \(marquette.edu\)](#) accessed August 12, 2023.
 14. “688 F. 2d 14 – Haffer v. Temple University” in **OpenJurist** available at [688 F2d 14 Haffer v. Temple University | OpenJurist](#) accessed August 12, 2023.
 15. Gioia, Dana, “Money” in **The Gods of Winter** (St. Paul, MN: The Graywolf Press, 1991), p. 33.
 16. “Timeline of women’s sports” in **Wikipedia, the free encyclopedia** available at [Timeline of women's sports - Wikipedia](#) accessed August 12, 2023.
 17. Ibid.
 18. Pruitt, Sarah, “What Are the Four Waves of Feminism?” at **History.com** available at [What Are the Four Waves of Feminism? | HISTORY](#) accessed August 3, 2023.
 19. “Cohen v. Brown: Split Decision by First Circuit reverses lower court remedy in Title IX case” at **News from Brown** available at [96-050 \(Title IX Appeal\) \(brown.edu\)](#) accessed August 12, 2023.
 20. “Equity in Athletics Disclosure Act”, at **National Women’s Law Center** available at [EADAFactsheet June 07.pdf \(nwlc.org\)](#) accessed August 3, 2023.
 21. “Timeline of women’s sports” in **Wikipedia, the free encyclopedia** available at [Timeline of women's sports - Wikipedia](#) accessed August 12, 2023.
 22. “History” at **WNBA** available at [History - WNBA](#) accessed August 12, 2023.
 23. “Tori Murden” at **Encyclopedia.com** available at [Murden, Tori | Encyclopedia.com](#) accessed August 12, 2023.
 24. Vecsey, George, “Sports of the Times: For Chastain, An Error, Then a Goal” in **The New York Times** (July 2, 1999) available at [Sports of The Times: For Chastain, An Error, Then a Goal - The New York Times \(nytimes.com\)](#) accessed August 12, 2023.
 25. “Timeline of women’s sports” in **Wikipedia, the free encyclopedia** available at [Timeline of women's sports - Wikipedia](#) accessed August 12, 2023.
 26. Glasser, Bailey, “Male and Female Student-Athletes Win Historic Title IX Sex Discrimination Settlements with Clemson University” at **CISION PR Newswire** available at [Male & Female Student-Athletes Win Historic Title IX Sex Discrimination Settlements with Clemson University \(prnewswire.com\)](#) accessed August 12, 2023.

27. *“Timeline of women’s sports”* in **Wikipedia, the free encyclopedia** available at [Timeline of women's sports - Wikipedia](#) accessed August 12, 2023.
28. Rasmussen, Karl, “ESPN Reveals Record-Setting Ratings for Women’s Final Four” at **Sports Illustrated** (April 1, 2023) available at [Women’s Final Four: ESPN Reveals Record-Setting Ratings for National Semifinals - Sports Illustrated](#) accessed August 12, 2023.

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