



May 2018

HIGH SCHOOL SPORTS

Many Schools
Encouraged Equal
Opportunities, but
Education Could
Further Help Athletics
Administrators under
Title IX

GAO Highlights

Highlights of [GAO-18-425](#), a report to congressional committees

Why GAO Did This Study

Research has found that sports participation yields many benefits for youth. Girls' participation in sports has increased dramatically since the passage of Title IX in 1972, but is still lower than for boys. Further, investigations by OCR, which enforces and implements Title IX, have highlighted instances of disparities in the resources provided to girls' and boys' teams.

GAO was asked to review how public high schools encourage equal athletic opportunities. This report examines (1) measures public high schools and athletics administrators have taken to encourage equal athletic opportunities for boys and girls, and (2) factors that affect boys' and girls' participation levels in public high school sports programs. GAO conducted a nationally generalizable probability survey of athletics administrators at 784 public high schools. GAO interviewed nine subject matter specialists selected to provide a range of perspectives. GAO also reviewed relevant federal laws, regulations, and guidance and interviewed OCR officials.

What GAO Recommends

GAO is recommending that OCR determine the extent of K-12 Title IX coordinators' knowledge and use of tools in its existing guidance and use this information in its efforts to encourage them to work with athletics administrators to help ensure equal athletic opportunities. Education partially concurred, stating it would consider GAO's recommendation in its complaint investigations, technical assistance activities, and communication practice reviews.

View [GAO-18-425](#). For more information, contact Jacqueline M. Nowicki, 617-788-0580 or nowickij@gao.gov.

May 2018

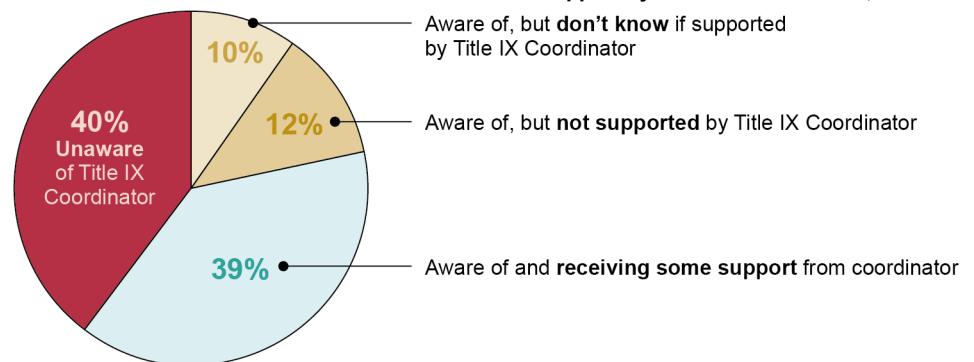
HIGH SCHOOL SPORTS

Many Schools Encouraged Equal Opportunities, but Education Could Further Help Athletics Administrators under Title IX

What GAO Found

According to GAO's nationally generalizable survey of athletics administrators, public high schools recently took various measures to encourage equal opportunities for boys and girls in sports. For example, a majority assessed resources such as equipment, travel opportunities, and facilities that they provided to girls' and boys' teams and some schools took steps to gauge student interest in specific sports as a means of encouraging equal opportunities, according to GAO's survey. Education's Office for Civil Rights (OCR) guidance indicates that Title IX coordinators—which school districts are required to designate and make visible per regulations for Title IX of the 1972 Education Amendments (Title IX)—should work closely with athletics administrators to determine whether action is needed to address any underrepresentation, or to otherwise encourage equal athletic opportunities. However, GAO estimates that 51 percent of athletics administrators either were unaware of or unsupported by their Title IX coordinator, according to the survey (see figure). These findings raise questions as to whether Title IX coordinators are familiar with and using Education's guidance. Officials from an association for Title IX coordinators said this lack of communication with athletics administrators may be related to some Title IX coordinators' limited understanding of Title IX and athletics. OCR officials said that they did not know the extent to which Title IX coordinators are working with their athletics administrators to encourage equal athletic opportunities because Education generally does not collect this information. Better information on Title IX coordinators could help Education support school districts' efforts to encourage equal sports opportunities for girls and boys.

School Athletics Administrators' Awareness of and Support by Title IX Coordinators, 2017



Source: GAO survey of public high school athletics administrators. | GAO-18-425

Note: All estimates in this figure have a margin of error of plus or minus 6.4 percent or less, at the 95 percent confidence level. The percentage who were either unaware of or unsupported by their Title IX coordinators (51 percent) appears higher in this graphic (52 percent) due to rounding.

The factors that most affect boys' and girls' participation in public high school sports are the number of, and interest in, participation opportunities offered, according to GAO's survey and interviews with nine subject matter specialists. Though the survey provided no clear consensus on factors that discourage students from participating in sports, athletics administrators most often perceived students' competing responsibilities as discouraging participation.

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Abbreviations

CCD	Common Core of Data
CRDC	Civil Rights Data Collection
Education	U.S. Department of Education
K-12	Kindergarten through 12th grade
OCR	Office for Civil Rights
Title IX	Title IX of the 1972 Education Amendments

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May 10, 2018

The Honorable Lamar Alexander
Chairman
The Honorable Patty Murray
Ranking Member
Committee on Health, Education, Labor, and Pensions
United States Senate

The Honorable Virginia Foxx
Chairwoman
The Honorable Robert C. "Bobby" Scott
Ranking Member
Committee on Education and the Workforce
House of Representatives

We have previously reported that sports participation yields many benefits for youth, ranging from positive health outcomes to improved academic achievement to increased self-esteem, and schools are uniquely positioned to provide students with opportunities to participate in sports.¹ We have also reported that girls began playing high school sports in large numbers only after the passage of Title IX of the 1972 Education Amendments (Title IX),² which prohibits discrimination on the basis of sex in any education programs and activities by recipients of federal financial assistance.³ However, girls' sports participation remains lower than boys' participation. Further, the Department of Education (Education) has found instances of disparities or potential disparities in the benefits and services

¹ GAO, *K-12 Education: School-Based Physical Education and Sports Programs*, [GAO-12-350](#) (Washington, D.C.: Feb. 29, 2012).

² GAO, *K-12 Education: High School Sports Access and Participation*, [GAO-17-754R](#) (Washington, D.C.: Sept. 14, 2017).

³ Title IX is codified at 20 U.S.C. §§ 1681–1688 and the Department of Education's Title IX regulations are available at 34 C.F.R. Part 106. Title IX applies to educational programs or activities receiving federal financial assistance, with some exceptions. 20 U.S.C. § 1681(a). When we refer to schools in this report, we are only including schools that are recipients of federal financial assistance and thus subject to Title IX. Further, the scope of this report is limited to high school interscholastic sports programs.

provided to girls' and boys' teams, including equipment, facilities, and schedules for practices and games.⁴

You asked us to examine how public high schools encourage equal athletic opportunities for members of both sexes.⁵ This report examines (1) what measures public high schools and athletics administrators have taken to encourage equal athletic opportunities for boys and girls, and (2) what factors affect boys' and girls' participation levels in public high school sports programs.

To examine both of these questions, we conducted a nationally generalizable web-based survey of athletics administrators in a stratified, random sample of 784 U.S. public high schools.⁶ The survey asked about factors that encourage or discourage boys' and girls' participation in interscholastic sports (team-based organized sports activities that offer competition among schools), activities schools conduct related to encouraging equal opportunities in these sports, and challenges they encounter in doing so. The survey, which we administered from June through early September 2017, had a weighted response rate of 42 percent, and the results are generalizable.⁷ To obtain additional context and illustrative examples to supplement our survey data, we conducted follow-up interviews with eight athletics administrator respondents, who were selected for variation in their survey responses, such as the extent to which they conducted activities to encourage equal opportunities, and their schools' characteristics, such as locale type (urban, suburban, or

⁴ See, for example, Department of Education, Office for Civil Rights, Compliance Resolution Letters to Hingham Public School District (Oct. 26, 2012) and Jurupa Unified School District (Feb. 7, 1995). Education officials also provided us with a more recent resolution agreement in which another school district agreed to address allegations of unequal benefits and services before Education completed its investigation. This agreement is not publicly available.

⁵ In this report, we use the term "equal opportunity" to refer to equal athletic opportunity. In discussing equal opportunities, we use the language of Education's Title IX regulations, which refer to opportunities for two sexes and do not explicitly address gender non-conforming students.

⁶ Athletics administrators are school or district officials who manage and oversee a school's sports program. Their official titles vary by school and may include "athletic directors" or "activities directors" who also oversee athletics. Some may have other teaching or administrative duties at the school.

⁷ The unweighted response rate was 40 percent. We conducted a nonresponse bias analysis and adjusted the sampling weights to account for potential nonresponse bias. See appendix I for details and appendix II for the survey instrument.

rural). We also interviewed subject matter specialists at nine organizations, including national associations of athletics and Title IX administrators (whose membership includes Title IX coordinators); organizations that advocate for sports and gender equity issues; and research centers that study these issues. We selected individuals and organizations to interview to represent a range of perspectives on these issues. We also reviewed federal laws, regulations, and guidance, and interviewed officials at Education’s Office for Civil Rights (OCR). Our analysis should not be used to make conclusions about legal compliance with Title IX requirements or the presence or absence of discrimination in public high school interscholastic sports programs.

We conducted this performance audit from February 2017 to May 2018 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

Background

Research has found that girls’ participation in sports has increased dramatically since the passage of Title IX.⁸ However, research has also found that progress toward equal sports participation between boys and girls has slowed since 2000, and a participation gap remains between the sexes.⁹ We previously reported that federal data from school year 2013-14 showed that national girls’ participation rates in public high school interscholastic sports remained nearly 10 percentage points lower than boys’ rates.¹⁰ The same data showed that at nearly half of schools, girls’

⁸ See C. Cooky and N. M. LaVoi, “Playing but Losing: Women’s Sports after Title IX,” *Contexts*, Vol. 11, No. 1 (2012).

⁹ See, for example, Bridging the Gap, *Sports Participation in Secondary Schools: Resources Available and Inequalities in Participation - A BTG Research Brief* (Ann Arbor, MI: Bridging the Gap Program, Survey Research Center, Institute for Social Research, University of Michigan, 2012); Women’s Sports Foundation, *Progress Without Equity: The Provision of High School Athletic Opportunity in the United States, by Gender 1993-94 through 2005-06* (Center for Research on Physical Activity, Sport & Health, D’Youville College, SHARP Center, University of Michigan, 2011); and D. Sabo and P. Veliz. *The Decade of Decline: Gender Equity in High School Sports* (Ann Arbor, MI: SHARP Center for Women and Girls, 2012).

¹⁰ [GAO-17-754R](#).

share of sports participation was less than their share of enrollment by 5 percentage points or more.¹¹

Education's Role

Within Education, OCR enforces and implements Title IX, which applies at all educational levels, including colleges, universities, and public school districts, with limited exceptions.¹² OCR's most recent annual report describes its mission as ensuring equal access to education and promoting educational excellence throughout the nation through vigorous enforcement of civil rights laws.¹³ OCR's core activities include responding to civil rights complaints filed by the public and conducting agency-initiated investigations to enforce federal civil rights laws; providing technical assistance to help institutions achieve compliance with the civil rights laws that OCR enforces; and issuing regulations and policy guidance to ensure equal access to educational opportunity. OCR also conducts the Civil Rights Data Collection (CRDC), which collects key information related to civil rights from public elementary and secondary schools and school districts, including information on interscholastic sports and teams offered for boys and girls and their participation.

With respect to athletics, Education's Title IX regulations require schools that offer sports teams to provide equal opportunities for members of both sexes.¹⁴ The regulations, along with OCR guidance, specify key elements OCR considers, among other things, in determining whether schools are offering equal opportunities (see fig. 1). OCR uses the number of participants on a school's sports teams as a proxy for participation

¹¹ In its reviews of Title IX compliance at individual schools, OCR considers a number of factors in determining whether boys' and girls' sports participation is substantially proportionate to their enrollment and does not use a specific numeric threshold.

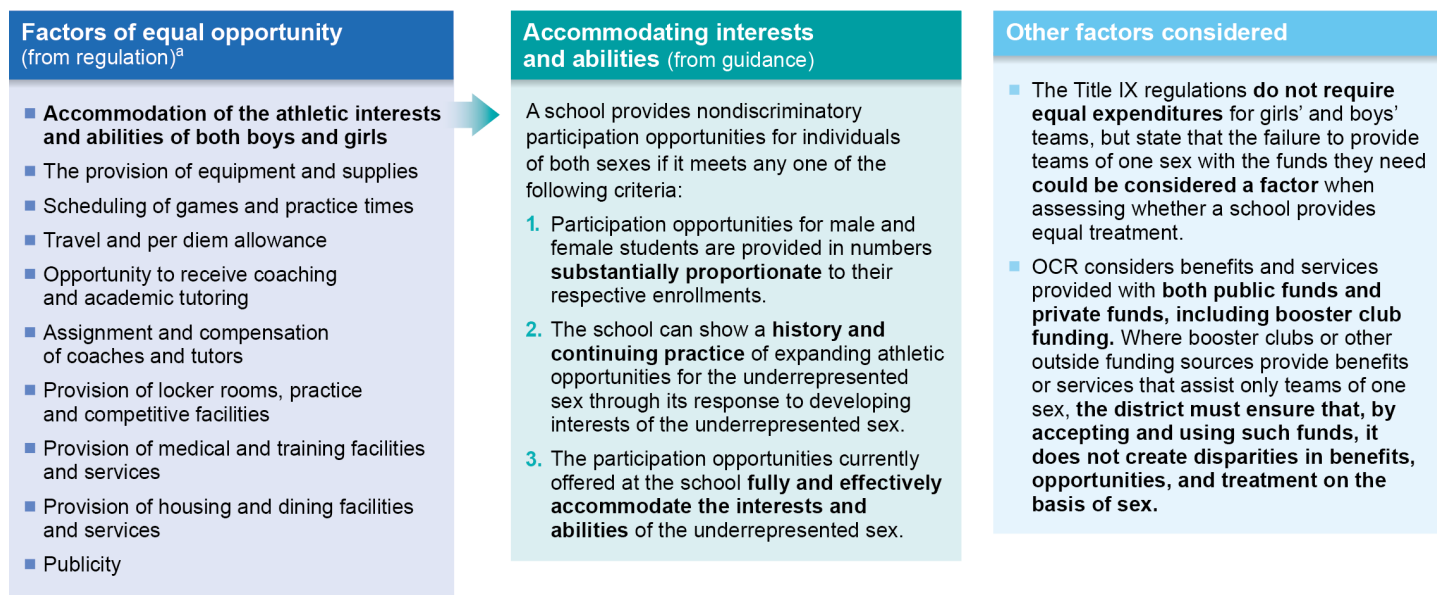
¹² 20 U.S.C. § 1681(a). The Department of Justice also plays a role. Specifically, Justice coordinates federal agency implementation and enforcement of Title IX and represents the United States and Education in Title IX enforcement actions raised in federal court litigation.

¹³ Department of Education, Office for Civil Rights, *Securing Equal Educational Opportunity: Report to the President and Secretary of Education* (December 2016).

¹⁴ 34 C.F.R. § 106.41(c).

opportunities when determining whether those opportunities are proportionate for boys and girls.¹⁵

Figure 1: Key Elements and Considerations in Equal Athletic Opportunity in Public High School Sports



Source: GAO analysis of the Department of Education's Title IX regulations, guidance, and compliance resolutions, and interviews with Education officials. | GAO-18-425

Note: In this report, we use the terms "school" and "school district" to refer to recipients of federal financial assistance.

^aIn determining whether equal opportunities are available, OCR will consider these, among other factors.

¹⁵ Education does not require public high schools to report data on the number of available "roster spots" on teams. According to some high school athletics administrators we interviewed, individual "roster spots" cannot easily be quantified because, for example, some sports teams allow all interested students to participate. In a 1996 Dear Colleague letter, OCR stated that it does not count "unfilled slots," (i.e., those positions on a team that an institution claims the team can support but which are not filled by actual athletes). OCR... [counts] actual athletes because participation opportunities must be real, not illusory... OCR considers the quality and kind of other benefits and opportunities offered to male and female athletes in determining overall whether an institution provides equal athletic opportunity. In this context, OCR must consider actual benefits provided to real students." See Department of Education, Office for Civil Rights, Dear Colleague Letter Clarifying the Three-Part Test (Jan. 16, 1996).

Recipients of federal education funds, such as public school districts, bear the responsibility for complying with Title IX.¹⁶ Districts are required to designate an employee to coordinate efforts under Title IX, and to make this Title IX coordinator visible.¹⁷ In 2014, we recommended OCR clarify and disseminate information on the roles and responsibilities of these Title IX coordinators.¹⁸ In response, during fiscal year 2015, OCR issued several pieces of Title IX guidance, including a Dear Colleague letter delineating the specific requirements and duties of coordinators, in addition to a letter to coordinators and a Title IX resource guide, which includes guidance on monitoring compliance in athletics.¹⁹ This guide states that the Title IX coordinator should work closely with many different members of the school community, including athletics administrators. Regarding athletics, it recommends tools that Title IX coordinators can use to encourage equal opportunities in athletics, which include evaluating whether there is unmet interest in a particular sport and comparing expenditures on boys' and girls' sports teams as an indicator of benefits provided to those teams.²⁰

¹⁶ Title IX applies to recipients of federal funds and the education programs or activities operated by such recipients, which includes, but is not limited to school districts. 34 C.F.R. § 106.11. For ease of reference this report will refer to Title IX requirements as applying to school districts, as well as the schools within them.

¹⁷ 34 C.F.R. § 106.8(a). School districts must notify all their students and employees of the name, office address, and telephone number of the Title IX coordinator. For ease of reference, we refer to this as a requirement that districts make Title IX coordinators visible.

¹⁸ GAO, *Child Welfare: Federal Agencies Can Better Support State Efforts to Prevent and Respond to Sexual Abuse by School Personnel*, GAO-14-42 (Washington, D.C.: January 27, 2014). This report examined the issue of sexual abuse of students by personnel in K-12 public schools.

¹⁹ The Title IX Coordinator guidance package is available at <https://www2.ed.gov/policy/rights/guid/ocr/title-ix-coordinators.html>. Earlier Title IX guidance on athletics is available at <https://www2.ed.gov/about/offices/list/ocr/frontpage/pro-students/issues/sex-issue04.html>, accessed March 1, 2018.

²⁰ In its guidance, OCR refers to elements of equal opportunity such as equipment, facilities, and schedules for games and practices as “athletic benefits and opportunities.” In this report, we refer to these items as resources.

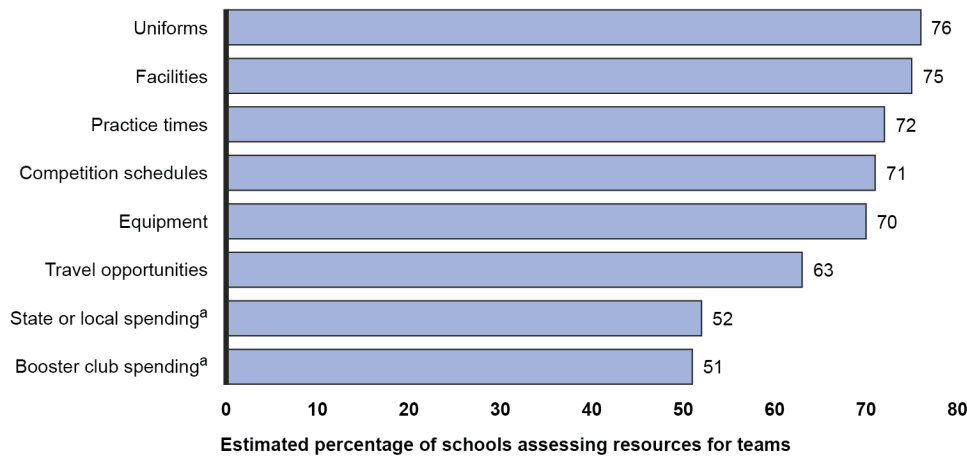
**Athletics
Administrators
Reported Schools
Took Some Steps to
Encourage Equal
Opportunities, but
About Half Did Not
Receive Title IX
Coordinator Support**

**To Encourage Equal
Opportunities, the Majority
of Athletics Administrators
Reported That Their
Schools Assessed
Resources Provided to
Boys' and Girls' Teams**

The majority of public high schools assessed some aspects of their sports programs over the past 2 years to encourage equal opportunities for boys' and girls' sports teams, according to our nationally generalizable survey of athletics administrators. Specifically, the estimated percentage of schools assessing key athletic resources provided to these teams ranged from 63 percent of schools assessing travel opportunities to 76 percent assessing uniforms (see fig. 2).²¹

²¹ Our survey did not ask athletics administrators about assessments of every resource mentioned in the Title IX regulations. All estimates presented in this report from this survey have a margin of error of plus or minus 7.7 percentage points or less at the 95 percent confidence level, unless otherwise noted.

Figure 2: Estimated Percent of Public High Schools That Assessed Resources and Spending for Boys' and Girls' Teams



Source: GAO survey of public high school athletics administrators. | GAO-18-425

Note: The survey asked about assessments in the past 2 years. All estimates in this figure have a margin of error of plus or minus 7.7 percent or less at the 95 percent confidence level.

^aThe percentage assessing state and local spending is among those who received state or local funds for athletics. The percentage assessing booster club spending is among those whose schools had booster clubs for athletics. Our survey asked whether schools monitored or directed the spending of these funding sources for gender equity purposes.

In our interviews with eight athletics administrators, we heard a variety of approaches to assessing these resources. For example, when scheduling practice times and competitions, five athletics administrators said that they scheduled a boys' competition only if they could also schedule a girls' competition. Four athletics administrators described watching practices, inspecting equipment to identify when it needed replacement, or replacing equipment as their coaches requested it. Four athletics administrators said that coaches can sometimes influence the distribution of resources. For instance, one athletics administrator noted that in the past, his school had unequal facilities for boys' baseball and girls' softball, stemming in part from the boys' baseball coach being a stronger advocate for his team. However, these athletics administrators generally described working with the coaches to ensure that resource allocation did not create inequalities.

Most schools reported using a mix of public and private funds to support their athletic programs. An estimated 75 percent of public high schools received public funding (state or local) for their sports programs; for some individual sports or school athletics programs, public funding may be the

primary funding source. We estimate that about 52 percent of schools that received public funding monitored or directed its use to help encourage equal resources for boys' and girls' teams. OCR's Title IX Resource Guide encourages Title IX coordinators to periodically review expenditures on male and female athletic teams as part of their review of resources.²² At four schools, athletics administrators told us that they paid attention to the actual resources girls and boys received rather than focusing on expenditures, and three of these administrators explained there could be valid reasons for spending differences. For example, one athletics director said that both boys' and girls' hockey teams at his school participated in annual tournaments, but the girls preferred a tournament that did not require a hotel stay, so it was less expensive.

In addition, we estimate that about 81 percent of public high schools had at least one booster club and, according to our survey, an estimated 51 percent of these schools monitored or directed the club to encourage equal opportunities. Among the eight athletics administrators we interviewed, relationships with booster clubs varied. For instance, some issued booster club guidelines and approved their purchases in advance, while others had no oversight of booster club expenditures.²³ For example, one athletics administrator told us that he provides booster club presidents with written guidelines and approves purchases to make sure they do not create a Title IX compliance issue. Another athletics administrator's school had recently undergone negotiations to obtain access to booster club expenditure records for the first time so that they could regularly review those expenditures. OCR has stated in compliance decisions, and OCR officials confirmed to us in interviews, that it considers resources provided through the use of private funds, including booster funding, in assessing whether schools are providing equivalent resources to teams of each sex. An official from a national association representing athletics administrators stated that administrators who take the association's Title IX trainings are often surprised to learn they should

²² Department of Education, Office for Civil Rights, *Title IX Resource Guide* (April 2015). Neither review of expenditure data nor equal spending on both sexes is required for Title IX compliance.

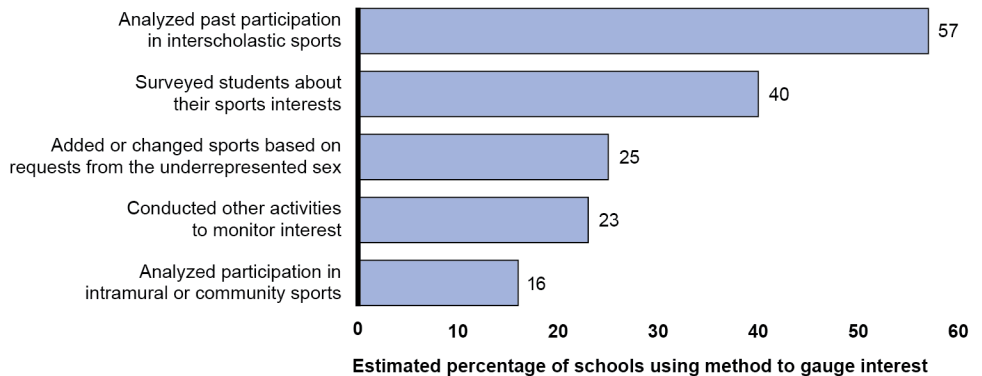
²³ One of the eight athletics administrators did not have a booster club at his high school.

monitor or direct booster club spending to help ensure equal opportunities.²⁴

Some Athletics Administrators Reported That Their Schools Used Surveys and Other Tools to Gauge Student Sports Interests, Which Can Help Encourage Equal Opportunities

In addition to assessing the various school and booster club resources provided to boys' and girls' teams, some schools recently took steps to gauge student interest in specific sports as a means of encouraging equal opportunities, according to our survey. For example, we estimate that 40 percent of schools surveyed students about their sports interests over the last 2 school years and 25 percent added or changed their sports offerings based on requests from the underrepresented sex in their school's sports program (see fig. 3).²⁵

Figure 3: Estimated Percent of Public High Schools That Conducted Certain Activities to Gauge Student Interest



Source: GAO survey of public high school athletics administrators. | GAO-18-425

Note: The survey asked about activities conducted in the past 2 years. All estimates in this figure have a margin of error of plus or minus 6.4 percent or less at the 95 percent confidence level.

²⁴ The association offers a number of voluntary professional development courses and certifications for athletics administrators. The association official made this observation in reference to administrators who attend a course the association offers on Title IX compliance. An association official also told us that some states and school districts require their athletics administrators to take certain courses or earn certifications, but many do not. In some states a majority of athletics administrators are not association members.

²⁵ According to OCR guidance, schools should consider several factors in determining whether to add a sport based on student interests, including whether there is sufficient ability to sustain a team in the sport, and whether there is a reasonable expectation of competition for the team.

An estimated 31 percent of schools had not recently used any of these tools, or did not know if they had used the tools, to gauge student interest. And, according to our analysis of Education's data, 60 percent of schools had one sex underrepresented by more than 5 percent in their sports programs in school year 2013-14.²⁶

OCR guidance states that where one sex is underrepresented in sports, schools can demonstrate they are providing equal participation opportunities by using multiple indicators to identify, among other things, whether the sports currently offered meet student interest.²⁷ OCR guidance also states that in its investigations the agency determines on a case-by-case basis whether sports participation numbers at a school are disproportionate, and whether the school is taking sufficient steps to accommodate the athletic interests and abilities of both girls and boys.²⁸ In addition, OCR guidance describes tools that schools and school districts can use to assess for themselves whether action is needed to address any underrepresentation, or to otherwise encourage equal athletic opportunities. According to the guidance, these efforts should be led by the school district's Title IX coordinator.²⁹

²⁶ We used the OCR's CRDC data for this analysis, and compared the percentage of sports participants at the school who were girls to the percent of enrolled students who were girls. OCR guidance states, and an OCR official told us, that they have no specific numeric threshold for determining whether girls' and boys' sports participation is substantially proportionate. We used 5 percent as the threshold for this analysis because a key association told us they advise their membership to use this threshold as a general guideline in analyzing their own participation for potential compliance issues.

²⁷ See U.S. Department of Education, Office for Civil Rights, Dear Colleague Letter on Intercollegiate Athletics Policy Clarification: The Three-Part Test – Part Three (April 2010.)

²⁸ See U.S. Department of Education, Office for Civil Rights, Dear Colleague Letter on the Clarification of Intercollegiate Athletics Policy Guidance: The Three-Part Test (the Clarification) (January 1996.)

²⁹ Education, "*Title IX Resource Guide*."

About Half of Athletics Administrators Were Either Unaware of or Unsupported by Their District Title IX Coordinator

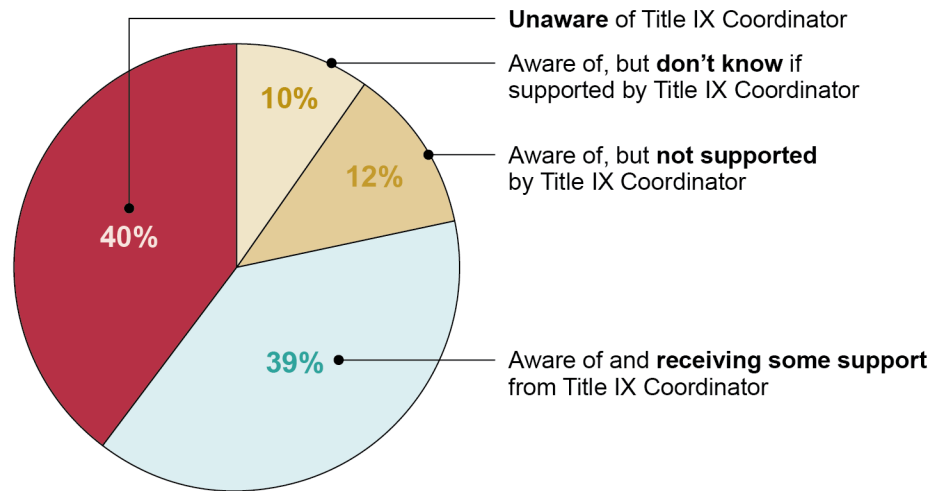
About 51 percent of athletics administrators were either not aware of or not supported by their Title IX coordinator, according to our survey.³⁰ Specifically, we estimate that 40 percent of athletics administrators—serving about 6,110 schools and 5 million students—were unaware of a Title IX coordinator in their school district and that an additional 12 percent were aware of their Title IX coordinator but received little to no support from them (see fig. 4).³¹ We also found that almost all of the athletics administrators who were not aware of having a Title IX coordinator were in a district that had, in fact, designated one. Specifically, when we matched athletic administrators' survey responses with OCR's data and extrapolated to the population overall, we estimated that 99 percent of the athletics administrators who were not aware of a Title IX coordinator in their district were in a school district that had listed a coordinator in school year 2013-14. Further, an estimated 26 percent of athletics administrators wanted additional guidance or assistance related to encouraging equal opportunities for boys and girls, according to our survey.³²

³⁰ Although 51 percent of athletics administrators were either unaware of or unsupported by their Title IX coordinators, in figure 4 the percentage appears higher (52 percent) due to rounding.

³¹ The 40 percent estimate includes athletics administrators who did not think their district had a Title IX coordinator (16 percent) or did not know whether they had one (24 percent). The relative margin of error for both estimates of students and of schools is within plus or minus 19 percent of the estimate itself.

³² Only an estimated 4 percent of athletics administrators specifically wanted additional support from their Title IX coordinator. Officials from an organization representing Title IX coordinators and providing Title IX training said that some athletics administrators resist oversight from outside the athletics department. This observation, along with the fact that an estimated 40 percent of athletics administrators were not aware they had a Title IX coordinator, could help explain why so few athletics administrators wanted additional Title IX coordinator support.

Figure 4: An Estimated Fifty-One Percent of Athletics Administrators Were Either Unaware of or Unsupported by Their Title IX Coordinator in 2017



Source: GAO survey of public high school athletics administrators. | GAO-18-425

Note: All estimates in this figure have a margin of error of plus or minus 6.4 percent or less at the 95 percent confidence level. Percentages add to over 100 due to rounding. Although 51 percent of athletics administrators were either unaware of or unsupported by their Title IX coordinators, in this figure the percentage appears higher (52 percent) due to rounding. We classified athletics administrators as receiving support from their Title IX coordinators if they responded on our survey that they frequently or sometimes received guidance or assistance from their Title IX coordinator, worked with their Title IX coordinator in the last 2 years to help ensure that the needs of the underrepresented sex in their sports program were met, or both.

Given the significant number of athletics administrators who reported being unaware of or unsupported by their Title IX coordinators, our survey results raise questions as to whether Title IX coordinators—whom school districts must designate and make visible in accordance with Title IX regulations—are familiar with and using OCR’s guidance on their role and responsibilities. This guidance states that the Title IX coordinator should support and work closely with members of the school community, including athletics administrators, to ensure compliance with Title IX.³³ When asked about these survey results, officials from an association for Title IX coordinators and for other related administrators told us that they were not surprised that a number of athletics administrators were not aware of or supported by their Title IX coordinator, because the results are consistent with what they hear when interacting with their members across the country. Based on these interactions, these association

³³ Education, “Title IX Resource Guide.”

officials said they have observed that there is often a separation between athletics and other school departments, and that Title IX coordinators without an athletics background may be reluctant to engage in oversight of that department.

Based on their experiences providing training to Title IX coordinators, these association officials also said that Title IX coordinators' familiarity with Title IX requirements has improved somewhat since the release of OCR's 2015 guidance delineating their role and responsibilities, but their familiarity with these requirements is still generally low, particularly with respect to athletics. In these officials' opinion, this lack of understanding is due in part to the complex and wide-ranging nature of Title IX and to the lack of resources for training in many school districts. These and other subject matter specialists we interviewed said that other potential factors contributing to athletics administrators' lack of awareness of their Title IX coordinator included high turnover among athletics administrators and myriad responsibilities of staff in both roles. When Title IX coordinators do not work closely with athletics administrators, as OCR guidance suggests they do, they may miss opportunities to make those administrators aware of tools the guidance recommends that could help advance equal opportunities. In addition, OCR guidance recognizes that the most serious Title IX violations tend to occur in districts without a supportive Title IX coordinator.³⁴

OCR officials said that they had learned from their complaint investigations and compliance reviews that some athletics administrators were not working with their districts' Title IX coordinators. However, these officials said they did not know the extent to which Title IX coordinators themselves were aware of and using the tools recommended in their guidance because, outside of these enforcement activities, OCR generally does not collect information on Title IX coordinators' knowledge of or activities related to the guidance.³⁵ Standards for internal control in the federal government state that agencies should both obtain quality information from and communicate quality information to external parties to help achieve the agency's objectives and address risks. In OCR's

³⁴ U.S. Department of Education, Office for Civil Rights, Dear Colleague Letter on Title IX Coordinators (April 25, 2015.)

³⁵ From 2010 to 2017, OCR investigated 7,910 complaints related to Title IX at the K-12 level, and conducted 9 self-initiated compliance reviews. OCR reported that 87 of the complaints and 2 of the compliance reviews specifically involved the Title IX coordinator at the K-12 level.

case, its objectives include ensuring schools actively encourage equal opportunities for boys and girls as articulated in Education’s Title IX regulations and OCR guidance, and risks include violations of Title IX that have not resulted in formal complaints. Absent better information on Title IX coordinators’ awareness and use of Title IX guidance, OCR may not have a complete picture of school districts’ ongoing efforts to encourage equal opportunities, challenges they encounter in doing so, and successful strategies that might be shared with a broader audience. Collecting and analyzing this information could enable OCR to target its communication to Title IX coordinators, and further encourage them to work with athletics administrators on ensuring equal athletic opportunities.

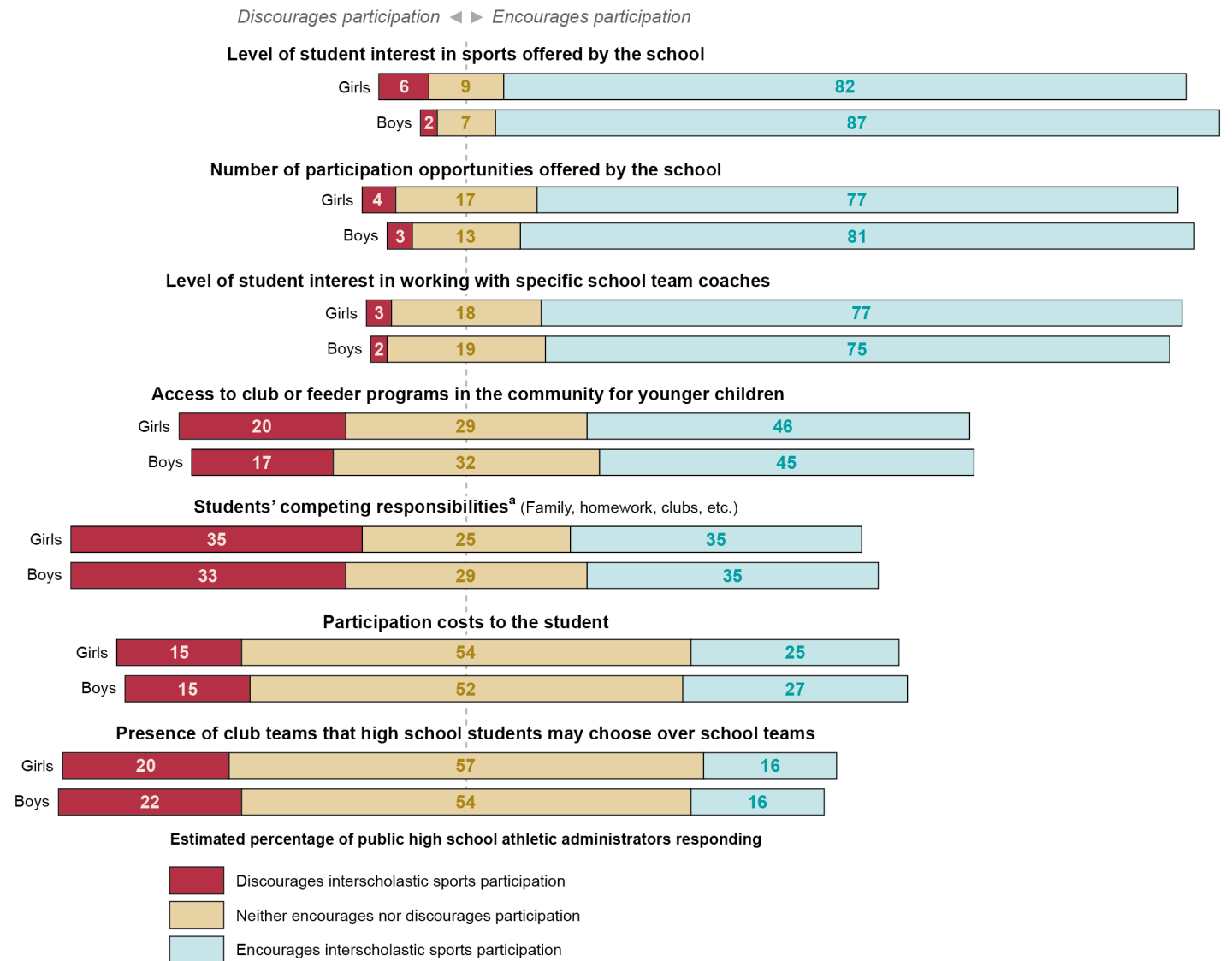
Available Opportunities Helped Drive Public High School Sports Participation Levels, but Family Resources and Other Factors Could Limit Participation

The Number of and Interest in Opportunities Offered by Schools Encouraged Higher Participation Levels

The number of participation opportunities schools offered, as well as student interest in those opportunities and in working with specific coaches at the school, were top factors that encouraged interscholastic sports participation among public high school students, according to our survey of public high school athletics administrators. We estimate that over 70 percent of athletics administrators viewed the number of interscholastic athletic participation opportunities at their school as encouraging boys and girls to participate in high school sports (see fig. 5).³⁶

³⁶ Because there are no available data that specifically measure individual “roster spots,” our work relies on the opinions of informed stakeholders, including athletics administrators and subject matter specialists such as researchers and advocates.

Figure 5: Factors Public High School Athletics Administrators Viewed as Encouraging and Discouraging Girls' and Boys' Interscholastic Sports Participation at Their Schools



Source: GAO survey of public high school athletics administrators. | GAO-18-425

Note: All estimates in this figure have a margin of error of plus or minus 6.4 percentage points or less at the 95 percent confidence level. None of the differences in estimates for girls and boys are statistically significant. Estimates do not add to 100 because a small number of survey respondents answered "don't know" or did not answer the question.

^aTwo of eight athletic administrators we interviewed said they misinterpreted the survey question around students' competing responsibilities to mean opportunities to compete, raising the possibility that the numbers showing students' competing responsibilities as encouraging interscholastic sports participation are overstated.

Our 2017 report on high school sports access and participation found that in school year 2013-14, public high schools overall offered the same number of sports and teams for boys and girls.³⁷ Of the nine subject matter specialists we interviewed for this report, six described specific knowledge of factors that encourage or discourage participation in high school sports. All six of these subject matter specialists agreed that opportunity is an important factor affecting student participation, especially for girls; several specialists also said that the continued participation gap shows that girls do not have access to an equal number of roster spots on teams as boys.³⁸ For example, one researcher, as well as a representative of a national association of athletics administrators, suggested that one reason the gap between boys and girls persists is that schools do not offer girls' sports with roster sizes equivalent to popular boys' sports, such as football.³⁹ One of the eight athletics administrators said that this was the case at her school, noting that none of her girls' teams came close to the size of the football teams. The gap may be particularly acute for minority girls, according to one subject matter specialist. Our 2017 report on public high school sports access and participation found that, for both boys and girls, fewer students attended high minority and high poverty schools that offered sports, compared to students at other schools, and these schools had lower participation rates when they did offer sports.

We estimate that over 75 percent of athletics administrators viewed the level of student interest in the sports offered by their school as encouraging participation in their school's teams. Several subject matter specialists agreed that offering sports that align with students' specific interests is an important aspect of providing meaningful opportunities, but a few also noted that some schools fail to consider which sports most interest their female students.

³⁷ [GAO-17-754R](#); in this report we analyzed the variables available through the Civil Rights Data Collection—sports and teams offered, and participation.

³⁸ For the purposes of this section, when discussing consensus among the six subject matter specialists, "a few" means two to three were in agreement, "several" means four to five were in agreement, and "all" means all six were in agreement. When discussing consensus among the eight athletics administrators we interviewed, "a few" means two to three were in agreement, "several" means four to five were in agreement, "most" means six to seven were in agreement, and "all" means eight were in agreement.

³⁹ We did not include this national association in our count of subject matter specialists because we did not ask them about factors affecting student participation more generally.

We estimate that 70 percent or more of athletics administrators viewed student interest in working with certain coaches as a factor that encouraged participation at their school. As explained by one researcher, coaching quality plays a large role in encouraging high school sports participation and a good coach can pull students into a sport and keep them participating. Alternatively, another researcher noted that less qualified or inexperienced coaches depress participation. These views are consistent with our work, in which we reported that the quality of coaching is a key factor in maximizing the positive effects of sports participation on students' personal development.⁴⁰

In addition, research shows that the state of athletic facilities can also affect a student's choice to participate in high school sports, and a few athletics administrators and subject matter specialists we interviewed also cited this as a factor. For example, one study found that proximity to sports facilities was a factor predicting children's participation in team sports.⁴¹ Another study found that student participation in interscholastic sports is higher at schools with more sports facilities compared with schools that have few sports facilities.⁴² A few of the subject matter specialists and one athletics administrator made similar observations about the relationship between facilities, participation, and inequity. For example, the athletics administrator said that at his high school, baseball and softball participation has decreased because their athletic facilities are located off campus, requiring additional travel for both students and parents for practices and games. Additionally, representatives from two advocacy groups noted that parents may have concerns related to school sports facilities, particularly for the safety of their daughters. For example, one said that some schools have girls' teams practice in off-campus facilities, sometimes in unsafe neighborhoods, without offering transportation. The other said parents may be concerned when fields are insufficiently lit or their daughters come home late from practices.

⁴⁰ [GAO-12-350](#)

⁴¹ D. Sabo and P. Veliz. (2008). *Go Out and Play: Youth Sports in America*. East Meadow, NY: Women's Sports Foundation.

⁴² N. Colabianchi, L. Johnston, and P.M. O'Malley. *Sports Participation in Secondary Schools: Resources Available and Inequalities in Participation – A BTG Research Brief*. (Ann Arbor, MI: Bridging the Gap Program, Survey Research Center, Institute for Social Research, University of Michigan, 2012).

Factors Related to Family and Community Resources and Cultural Expectations May Discourage Participation in Sports

We found no clear consensus in our survey of athletics administrators regarding factors that tend to discourage students from participating in sports, and the eight athletic administrators we interviewed had mixed views on the subject. That said, the most frequently mentioned factors that were perceived to discourage participation (representing an estimated 15-35 percent of athletic administrators) were (1) competing responsibilities, (2) lack of access to athletic feeder programs, (3) the perceived benefits of joining club teams, and (4) participation costs to the student.⁴³

- **Competing responsibilities.** Over one-quarter of athletics administrators cited students' competing responsibilities as discouraging participation in public high school sports. This could include a range of responsibilities, including schoolwork, other school activities, and family obligations. Among the athletic administrators we interviewed, one noted that many students at his magnet school were more focused on academics than athletics. A few cited examples of competing responsibilities that were tied to family resources. For example, two said that many of their students have jobs and family responsibilities that prevent them from participating in sports. One of these administrators said that his school's student population largely comes from lower-income families, and many are juggling jobs; in response, the school changed practice schedules to better match students' availability, which has made it easier for more students to participate.
- **Lack of access to athletic feeder programs.** Some athletics administrators also mentioned a lack of access to athletic feeder programs—club or community-based youth sports programs that train younger children before they enter high school—as discouraging participation in sports at their public high schools. In addition, a few of the eight athletics administrators we interviewed saw this lack of access as being closely related to community or family resources. Two of these administrators, who worked in lower-income schools, reported that younger children in their area have very little access to community or club sports and that students who do not have previous exposure to sports may lack the skills to participate at the high school

⁴³ The apparent differences in the estimated percentages citing each of these factors as discouraging were not statistically significant, with the exception of the percentages citing students' competing responsibilities, which were significantly higher than the percentages citing club teams and participation costs.

level. One of these administrators also said that having more community youth sports might increase student interest in playing at the high school level. A third athletics administrator said that feeder programs help drive participation in high school sports. In his school's competitive environment, students trying out for sports for the first time when they get to high school are, in most cases, likely to be cut from the team. He added that he has found that family income is a major contributing factor to children's ability to begin training early, which puts lower income students at a disadvantage. His point was echoed in one research study that found that as family income increases, boys and girls tend to enter organized sports at a younger age.⁴⁴

- **Perceived benefits of joining club teams.** Athletics administrators also mentioned the presence of club teams that students may choose over school teams as discouraging participation in public high school teams. This may be particularly true for higher-income students, as competitive travel and club teams—which parents and students may see as offering higher-caliber coaching, more specialized training, and greater opportunities to compete against elite athletes—can be quite expensive. Several subject matter specialists we interviewed cited this as an issue that affects high school sports participation. Further, a few of the high school athletics administrators we interviewed observed decreased student participation at their schools due to the presence of club teams. One athletics administrator from the Southwest explained that participation is weaker for his school's Olympic sports, such as swimming, due to competition from club sports. He noted that at his high school, this phenomenon makes it more difficult to recruit other students because the school teams become less competitive. Another athletics administrator from the Midwest explained that at his high school, the presence of club sports disproportionately depressed girls' participation in high school sports. In particular, he said the popularity of club girls' volleyball in the winter reduced participation in his girls' basketball teams.
- **Participation costs.** The cost to students of participating in athletics was also mentioned by some athletics administrators as discouraging participation in public high school teams. The subject matter specialists and athletics administrators we interviewed had mixed views on the effect of costs on student participation. Among the subject matter specialists, two said that the increasing prevalence of

⁴⁴ Sabo and Veliz, *Go Out and Play*, 119-122.

fees in high school sports programs is threatening participation by lower-income students. One athletics administrator agreed, saying that in the past he has dissuaded his school district from charging participation fees for this reason. Another said that his school does not charge fees, but students could still be discouraged by the fundraising required for “extras” such as team t-shirts. In contrast, one subject matter specialist said that it is typically higher-income schools that charge students fees to participate in sports, and therefore fees do not generally affect students in lower-income schools.

In addition to the four most commonly cited barriers from our survey, several research studies noted that cultural expectations around family responsibilities and gender roles may also discourage some student groups more than others. For example, one study found that Hispanic girls quit sports to take care of younger siblings at higher rates than their white peers.⁴⁵ This and another study noted that students from recent immigrant families may also be discouraged from participating in sports because of different cultural expectations around prioritizing sports, and girls may be additionally affected by expectations around gender roles. For example, it found that immigrant parents are more likely than non-immigrant parents to believe that boys are more interested in sports than girls, and that 75 percent of immigrant sons were involved with organized or team sports compared with 43 percent of immigrant daughters. Similarly, a study of sports involvement among East African immigrant girls found that those the researchers interviewed face social barriers to participation, such as peer criticism, parents’ fears of interactions with male athletes, and lack of parental support.⁴⁶

Several of the subject matter specialists and athletics administrators with whom we spoke made similar observations around cultural expectations. One suggested that differences in sports participation among immigrant communities may stem from the opportunities to play sports in the family’s country of origin, noting that the United States is unique in tying sports teams to its academic institutions. Officials from two advocacy organizations, one of which advocates for the Hispanic community,⁴⁷

⁴⁵ Sabo and Veliz, *Go Out and Play*, 133.

⁴⁶ Chelsey M. Thul & Nicole M. LaVoi (2011): Reducing physical inactivity and promoting active living: from the voices of East African immigrant adolescent girls, *Qualitative Research in Sport, Exercise and Health*, 3:2, 211-237

⁴⁷ This official was not included in our totals of subject matter specialists because our interview focused entirely on issues related to Hispanic students and families.

noted that some Hispanic families expect daughters to come home after school to help care for their siblings. This can interfere with participating in after-school activities. In addition, one athletics administrator we interviewed, whose school serves a predominantly Hispanic community, commented that his coaches have seen girls from this community quit sports teams on several occasions due to family responsibilities. One of the advocacy organization officials added that schools wanting to improve participation among Hispanic girls should, for example, consider more creative scheduling to allow these students to attend practices.

Conclusions

While sports participation for girls has risen dramatically over the last 45 years, a significant gap still remains between boys and girls in public high school sports. Our findings suggest that the reasons for this gap are varied and complex, and according to our survey, at many schools, athletics administrators are not aware of or do not receive support from their Title IX coordinator. OCR's guidance suggests that uninvolved Title IX coordinators are associated with serious Title IX violations, but OCR does not collect information about coordinators' level of involvement with districts and schools outside of its complaint investigations and compliance reviews. Better information about Title IX coordinators' awareness and use of OCR's guidance could help OCR support schools' and districts' efforts to provide equal opportunities in their sports programs.

Recommendation for Executive Action

The Department of Education's Assistant Secretary for Civil Rights should determine the extent to which Title IX coordinators at the K-12 level are aware of and using the tools recommended in OCR's existing guidance and any barriers preventing their use of this guidance, and use this information in OCR's efforts to encourage them to work with athletics administrators on ensuring equal athletic opportunities. (Recommendation 1)

Agency Comments and Our Evaluation

We provided a draft of this report to Education for review and comment. Education provided written comments that are reproduced in appendix III, as well as technical comments that we incorporated, as appropriate.

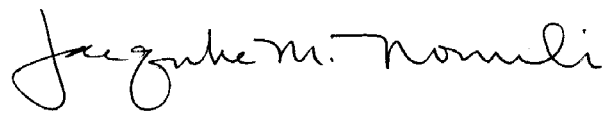
In its written comments, Education stated that it partially concurs with our recommendation that OCR determine the extent of K-12 Title IX coordinators' knowledge and use of tools in its existing guidance and use this information in its efforts to encourage them to work with athletics

administrators to help ensure equal athletic opportunities. Specifically, Education stated that when OCR conducts investigations in response to complaints it would look for opportunities to examine whether K-12 Title IX coordinators were aware of, and using, the tools in OCR's guidance. Education also said that when OCR engages in technical assistance activities, it will encourage Title IX coordinators to work with athletics administrators to encourage equal opportunities. Education also said that it will consider our recommendation during its frequent reviews of the agency's communications practices.

We agree that these are important first steps in helping ensure that Title IX coordinators are working with athletics administrators and otherwise fulfilling their responsibilities to encourage equal opportunities. However, given our finding that about half of public high school athletics administrators were unaware of or unsupported by their Title IX coordinator, we continue to believe the systemic approach we recommend is necessary. The activities that OCR described in its response are predicated on a complaint being filed or technical assistance being requested. This narrow approach means that OCR will likely not learn the full extent to which K-12 Title IX coordinators are unaware of or not using the tools in OCR's guidance. It also means that its reviews of the agency's communication practices may be hampered by incomplete information on how best to encourage Title IX coordinators to use these tools and work with athletics administrators to ensure equal opportunities.

As agreed with your offices, unless you publicly announce the contents of this report earlier, we plan no further distribution until 30 days from the report date. At that time, we will send copies to the appropriate congressional committees, the Secretary of Education, and other interested parties. In addition, this report will be available at no charge on GAO's website at <http://www.gao.gov>.

If you or your staff should have any questions about this report, please contact me at 617-788-0580 or nowickij@gao.gov. Contact points for our Offices of Congressional Relations and Public Affairs may be found on the last page of this report. GAO staff who made key contributions to this report are listed in appendix IV.

A handwritten signature in black ink that reads "Jacqueline M. Nowicki". The signature is written in a cursive style with a large initial 'J' and a long, sweeping underline.

Jacqueline M. Nowicki
Director, Education, Workforce,
and Income Security Issues

Appendix I: Scope and Methodology

The objectives of this study were to examine: (1) what measures public high schools and athletics administrators have taken to encourage equal athletic opportunities for boys and girls, and (2) what factors affect boys' and girls' participation levels in public high school sports programs. To address these objectives, we used a variety of methods, including a web-based survey of public high school athletics administrators; follow-up interviews with eight survey respondents; reviews of federal law, regulations, and guidance; and interviews with federal officials at the Department of Education (Education) and with subject matter specialists.¹

Web-based Survey of Public High School Athletics Administrators

To obtain school-level perspectives on factors that affect boys' and girls' participation levels in public high school sports programs and approaches schools and athletics administrators have used to encourage equal athletic opportunities, we designed and administered a survey to athletics administrators at a generalizable, stratified random sample of public high schools in the United States. The survey included questions about what sports and levels of competition the school offered for each sex, how many boys and girls participated in sports in school year 2015-16,² and factors that encourage and discourage girls' and boys' sports participation at the school. The survey also included a variety of questions related to the school's and athletics administrator's activities to encourage equal opportunities in the prior 2 years, challenges they faced in encouraging equal opportunities, sources of guidance on Title IX, booster club structures and oversight, and data they maintained on funding and expenditures. In addition, it included a question on whether, to the athletics administrator's knowledge, their school district had a Title IX coordinator.

Our population of interest for the survey was athletics administrators at public high schools. In terms of the schools, we defined our target population as public schools offering at least one high school level grade (9, 10, 11, or 12) that appeared in both Education's Common Core of

¹ Our analysis should not be used to make conclusions about legal compliance with Title IX requirements or the presence or absence of discrimination in public high school interscholastic sports programs.

² We determined that the sports participation data we received from schools were not sufficiently reliable for our purposes because nearly 30 percent of survey respondents did not answer these questions, and because of indications that schools were not consistent in how they counted participants. Instead, we used participation data from the Civil Rights Data Collection in our analysis.

Data (CCD) and Civil Rights Data Collection (CRDC) for the 2013-14 school year,³ were located in the 50 states and the District of Columbia, and indicated in the CRDC that they offered interscholastic sports. We excluded schools that were listed as closed or not operational according to the school year 2015-16 CCD, as well as single-sex schools and schools located in U.S. territories. We also obtained the most current school contact information from the school year 2015-16 CCD.

We originally selected a stratified random sample of 813 from a population of 15,330 schools in our sampling frame. However, we ultimately excluded 26 schools from our original population and sample because they had closed, did not serve high school grades, or did not offer interscholastic sports, and thus were not considered eligible for our survey. In addition, we found schools in the population and sample that shared sports programs and athletics administrators, effectively reducing the population by 10 schools and the sample by 3 schools for purposes of our survey. This resulted in a sample of 784 schools from the eligible population of 15,294.

We stratified this sample based on school type (charter or traditional),⁴ concentration of minority students (low = 0-25 percent, mid = 26-74 percent, high = 75-100 percent),⁵ locale type (urban, suburban, or rural), and participation rates of male and female students in school year 2013-14. This created 24 strata as noted in table 1. For the participation rate strata, we calculated each school's male and female students' participation rates using data from the school year 2013-14 CRDC. Participation rates were defined as the number of sports participants of that gender divided by the number of enrolled students of that gender, and these rates were then compared to determine which gender had higher participation: females or males. We placed schools with equal participation rates for males and females into the "Females" participation category because, given the overall higher participation rates for boys,

³ We used the most recent CRDC data available at the time of our analysis and the corresponding year of CCD data.

⁴ Charter schools are public schools established under charters that are granted autonomy from certain state and local laws and regulations in exchange for increased accountability. Traditional schools are all other public schools that are not exempt from these laws and regulations. Our sample also included magnet schools, which were classified based on whether they were charter or traditional schools.

⁵ We defined minority students as those who were black, Hispanic, Asian, Native Hawaiian or other Pacific Islander, American Indian or Alaska Native, or two or more races.

schools with both equal participation rates and higher rates for girls are rarer.

Table 1: Eligible Population and Sample Counts of Schools by Sample Design Stratification

Stratum	School type ^a	Minority students concentration ^b	Locale	Sex with higher sports participation ^c	Population counts	Sample counts
1	Traditional	Low	Rural	Females	1,821	66
2	Traditional	Low	Rural	Males	3,745	133
3	Traditional	Low	Suburban	Females	283	17
4	Traditional	Low	Suburban	Males	1,250	46
5	Traditional	Low	Urban	Females	42	17
6	Traditional	Low	Urban	Males	174	17
7	Traditional	Mid	Rural	Females	526	20
8	Traditional	Mid	Rural	Males	1,761	63
9	Traditional	Mid	Suburban	Females	286	17
10	Traditional	Mid	Suburban	Males	1,312	48
11	Traditional	Mid	Urban	Females	188	17
12	Traditional	Mid	Urban	Males	848	54
13	Traditional	High	Rural	Females	166	17
14	Traditional	High	Rural	Males	452	19
15	Traditional	High	Suburban	Females	153	17
16	Traditional	High	Suburban	Males	568	23
17	Traditional	High	Urban	Females	218	17
18	Traditional	High	Urban	Males	849	55
19	Charter	Low	All	Females	66	17
20	Charter	Low	All	Males	87	19
21	Charter	Mid	All	Females	67	17
22	Charter	Mid	All	Males	120	25
23	Charter	High	All	Females	115	24
24	Charter	High	All	Males	233	48
Total					15,330	813

Source: GAO survey sampling frame. | GAO-18-425

^aCharter schools are public schools established under charters that are granted autonomy from certain state and local laws and regulations in exchange for increased accountability. Traditional schools are all other public schools that are not exempt from these laws and regulations. Our sample also included magnet schools, which were classified based on whether they were charter or traditional schools.

^bLow = 0-25 percent, mid = 26-74 percent, high = 75-100 percent. We defined minority students as those who were black, Hispanic, Asian, Native Hawaiian or other Pacific Islander, American Indian or Alaska Native, or two or more races.

⁶Based on the Civil Rights Data Collection for school year 2013-14. We placed schools with equal participation rates for males and females into the "Females" participation category.

We chose these strata to ensure schools with the stratum characteristics were included in the sample. The total sample size of n=813⁶ was inflated for an expected 60 percent response rate, and we distributed the sample across the strata for workload and analysis considerations. The sample size in table 1 optimizes for some groups, while controlling the distribution across the 24 strata. Specifically, we calculated the Neyman optimal sample size that resulted in an overall 5 percent margin of error for an attribute estimate. We allocated samples across strata to achieve precision goals at two levels: overall population percentage estimates with margins of errors within plus or minus 5 percentage points, and subpopulation percentage estimates (i.e. school type, minority level, locale, or participation group) with margins of errors within plus or minus 10 percentage points, both at the 95 percent confidence level. Additionally, we ensured a minimum sample of 10 schools in every stratum.

Based solely on the constraint of an overall margin of error within plus or minus 5 percentage points, some reporting groups were expected to have margins of errors that were less than 10 percentage points without the need of additional explicit constraints. For other reporting groups, we implemented constraints so that the designed margin of error was within plus or minus 10 percentage points. Specifically, we included the following constraints for margins of error of attribute estimates with 95 percent confidence intervals within each reporting group, for a realized response rate of 60 percent:⁷

- margins of error within plus or minus 5 percentage points overall,
- within plus or minus 10 percentage points for urban schools,

⁶ The population of schools included in our sample frame included 26 schools that were found to be out of scope after sample selection, as well as 6 schools that were reduced to 3 because they shared the same athletic administrator. Therefore, the final sample of eligible schools, removing ineligibles and adjusting, resulted in a sample of 784 eligible schools, of which 313 responded.

⁷ We inflated our sample sizes for non-response within each strata by about 66 percent (1/0.6). We chose this percentage based upon knowledge of prior a GAO study of this population, as well as resource constraints. Since the realized response rate was 40 percent (less than the designed response rate of 60 percent), the margins of errors for some estimates are wider than expected, as noted throughout the report.

- within plus or minus 10 percentage points for high minority schools, and
- within plus or minus 10 percentage points for charter schools.

Because we followed a probability procedure based on random selections, our sample is only one of a large number of samples that we might have drawn. Since each sample could have provided different estimates, we expressed our confidence in the precision of our particular sample's results as a 95 percent confidence interval (e.g., plus or minus 7 percentage points). This is the interval that would contain the actual population value for 95 percent of the samples we could have drawn. Unless otherwise noted, all percentage estimates in this report have confidence intervals within plus or minus 7.7 percentage points. For other estimates, the confidence intervals or margins of error are presented along with the estimates themselves.

We took several steps to minimize non-sampling error. We used several methods to identify the names and email addresses of the athletics administrators for our selected sample of schools. In some states, the high school associations had directories we used to obtain this information. For those that did not, we searched the school's website or called the school or district. We administered the survey from June through early September 2017. To obtain the maximum number of responses to our survey, we sent e-mails to the principals of the schools in the sample prior to the survey's launch, asking them to support and encourage their athletics administrator to complete the survey. We also worked with the National Federation of State High School Associations to have the state associations e-mail their members and encourage them to participate in the survey. Finally, we sent direct reminder emails to nonrespondents and contacted nonrespondents over the telephone.

We took additional steps to minimize non-sampling errors, including pretesting draft instruments and using a web-based administration system. During survey development, we met with officials from national groups representing high school activities associations and athletics administrators and held discussion groups with nine athletics administrators to explore the feasibility of responding to the survey questions. We then pretested the draft instrument from April through May 2017 with five athletics administrators in public high schools that were diverse across a range of characteristics, such as region, school type and locale, and minority enrollment. In the pretests, we asked about the clarity of the questions and the flow and layout of the survey. A survey specialist

independent of the project team within GAO also reviewed a draft of the questionnaire prior to its administration. Based on feedback from the pretests and the independent review, we made revisions to the survey instrument. To further minimize non-sampling errors, we used a web-based survey, which allowed respondents to enter their responses directly into an electronic instrument. Using this method automatically created a record for each respondent in a data file and eliminated the errors associated with a manual data entry process.

Despite these efforts, like most surveys, our survey had nonresponse. Specifically, the weighted response rate was 42 percent.⁸ Survey nonresponse raises the possibility that those athletics administrators who did respond to the survey may not be representative of the intended population, due to nonresponse bias. We carried out a nonresponse bias analysis and identified three potential factors that may have been related to athletics administrators' propensity to respond: school concentration of minority students, school size, and region. In order to adjust for the potential nonresponse bias, we adjust the sampling weight with a nonresponse adjustment to form a final weight. Data analyzed using the final, nonresponse-adjusted sampling weight is assumed to be missing at random, given the nonresponse adjustments, and therefore unbiased for the intended population. We used response propensity weighting class adjustments based on a model that included the variables identified in the nonresponse bias analysis. We conducted our analysis using survey software that accounted for the sample design and weighting.

Survey Follow-Up Interviews

To gain further insights into factors that encourage or discourage participation in sports, schools' efforts to encourage equal opportunities, and the role of the Title IX coordinator, we conducted follow-up interviews with 8 athletics administrators, chosen from the 105 who had responded to our survey as of late August and indicated that they were willing to participate in a follow-up discussion on their responses. Specifically, we selected respondents to obtain diversity in their responses to a few key survey questions, as well as certain characteristics of their schools. In

⁸ The unweighted response rate was 40 percent.

making our selections, we considered their responses to survey questions on:⁹

- their awareness of their Title IX Coordinator,
- activities their schools conducted within the last two years to encourage equal opportunities for boys and girls in sports,¹⁰ and
- whether the school maintains expenditure data on sports and their willingness to share these data.

We identified school characteristics with the data sources used to create our survey sampling frame. The characteristics we considered to further narrow our selection were:

- school type (charter or traditional),
- region,¹¹
- school locale (urban, suburban, or rural),
- concentration of minority students (low-, mid-, or high-minority).¹²

Additionally, we reviewed open-ended responses in the survey to determine if there were answers that necessitated additional discussion or clarification (see table 2).

⁹ See appendix II for additional detail about the survey questions.

¹⁰ See questions 12 and 13 in appendix II. In total, we asked whether their schools conducted 17 different activities related to equal opportunities, such as assessing various resources available to girls' and boys' teams, surveying students about their sports interests, and monitoring or directing the spending of different funding sources for athletics. We also allowed them to indicate whether the schools conducted "other" activities related to equal opportunities.

¹¹ We grouped schools according to the major census regions and divisions of the United States.

¹² We used schools' minority classification in our survey strata.

Table 2: Characteristics of the Eight Schools Selected for Interviews

School	Survey response on Title IX coordinator	Survey response on whether school has sports expenditure data at all / by sex	Survey response on number of activities conducted to encourage equal opportunities	School type	Region	School locale	Concentration of minority students ^a
1	No	No / N/A	0	Traditional	South	Rural	Mid
2	Yes	Yes / No	13	Traditional	West	Urban	High
3	Don't know	Yes / Yes	10	Traditional	South	Suburban	High
4	Yes	Yes / Yes	9	Charter	West	Urban	High
5	No	Yes / Yes	7	Traditional	Midwest	Rural	Low
6	Yes	Yes/ Yes	12	Traditional	Midwest	Rural	Low
7	Yes	Yes/ Yes	9	Traditional	Northeast	Rural	Low
8	Yes	Yes / No	13	Charter	South	Urban	High

Source: GAO survey of public high school athletics administrators and analysis of Department of Education data on selected schools. | GAO-18-425

^aLow = 0-25 percent, mid = 26-74 percent, high = 75-100 percent. We defined minority students as those who were black, Hispanic, Asian, Native Hawaiian or other Pacific Islander, American Indian or Alaska Native, or two or more races.

In our interviews with the athletics administrator at each school, which we conducted by phone, we asked officials to describe their relationship with their Title IX coordinator, familiarity with Title IX requirements overall, and their familiarity with state and local guidance, specifically. We also asked them to describe their efforts to encourage equal opportunities in sports and the nature of challenges they have faced in doing so. In addition, we asked them about funding sources and their use of expenditure data, the role of booster clubs, and the role of outside funding. For each school where the athletics administrator reported that they had expenditure data, we requested a copy of these data. We obtained expenditure data from three schools.¹³ In some cases we obtained additional documentation such as booster club guidelines, processes for adding school sports, and participation data. Because we selected the schools for follow-up interviews judgmentally and only conducted eight interviews we cannot generalize our findings about their policies, practices, and challenges.

¹³ One of these three schools provided expenditure data on booster clubs, but not the overall athletic program's expenditures.

Review of Law,
Regulations, and
Guidance and Interviews
with Education Officials

To understand the requirements for providing equal athletic opportunities in public high schools and how Education's Office for Civil Rights (OCR) monitors and supports public school districts in meeting these requirements, we reviewed Title IX of the 1972 Education Amendments (Title IX), Education's Title IX regulations, and related guidance documents. We also interviewed OCR and other Education officials.

In addition, we reviewed selected research studies that provided context and insight into factors affecting high school sports participation.

Interviews with Subject
Matter Specialists

To obtain additional context and insights, we selected and interviewed subject matter specialists, including researchers and officials from advocacy groups and associations. We selected these subject specialists so that, together with the athletics administrators we surveyed and interviewed, they would provide a variety of perspectives on factors that affect boys' and girls' participation in high school sports and approaches schools use to encourage equal athletic opportunities. The researchers and officials we interviewed were located at:

- the Institute for Research on Women and Gender and the Sport, Health, and Activity Research and Policy Center at the University of Michigan,
- the Tucker Center for Research on Girls and Women in Sport at the University of Minnesota,
- the Department of Recreation, Sport and Tourism at the University of Illinois,
- National Women's Law Center,
- Women's Sports Foundation,
- UnidosUS,
- National Interscholastic Athletics Administrators Association
- National Federation of State High School Associations, and
- Association of Title IX Administrators.

We conducted this performance audit from February 2017 to May 2018 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain

sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

Appendix II: Survey of Public High School Athletics Administrators

The questions we asked in our survey of public high school athletics administrators, as well as definitions used, are shown below. The blanks in the survey were filled in with the name of each athletics administrator's school. Some questions were only asked if the athletics administrator responded a certain way to a prior question.

<p>Menu</p> <p>Contents</p> <p>Youth Sports Programs</p> <p>Definitions</p> <p>School Demographic Questions</p> <hr/> <p>Definitions</p> <p>Sports Offered to Students</p> <hr/> <p>Sports Offered to Students (continued)</p> <hr/> <p>Sports Offered to Students (continued)</p> <hr/> <p>Sports Offered to Students (continued)</p> <hr/> <p>Sports Offered to Students (continued)</p> <hr/> <p>Sports Offered to Students (continued)</p> <hr/> <p>Sports Offered to Students (continued)</p> <hr/> <p>Sports Participation</p> <hr/> <p>Gender Equity</p> <hr/> <p>Funding and Expenditures</p> <p>Submit survey to GAO</p> <hr/> <p>Navigate</p> <p><< < * > >></p>	<h2>Youth Sports Programs</h2> <h3>U.S. Government Accountability Office</h3>
	<h4>Definitions</h4> <div style="border: 1px solid #ccc; padding: 5px;"><p>Interscholastic sports: Team-based organized sports activities that offer competition among schools. A sport is a distinct sport, such as football, basketball, soccer, swimming, or tennis. Cheerleading/ spirit squads and dance teams are considered sports only if their primary purpose is to provide athletic competition at the interscholastic level rather than to support or promote other athletic activities. Include any interscholastic sports your school sponsors, regardless of whether your state sponsors a championship for that sport, but do NOT include intramural or club sports.</p><p>Sports teams: Refers to the competitive-level teams of each interscholastic sport, such as freshman team, junior varsity team, and varsity team.</p><p>Girls' sports teams: are those in which only female students participate. If male and female students practice together, but compete separately, report the female students as a team under this category.</p><p>Boys' sports teams: are those in which only male students participate. If male and female students practice together, but compete separately, report the male students as a team under this category.</p><p>Coed sports teams: are those in which both male and female students participate and compete together. If a team is open to students of both genders, but all participants in the team in school year 2015-16 were of only one gender, report that team as a girls' or boys' team depending on the gender of students participating.</p></div> <h4>School Demographic Questions</h4> <div style="border: 1px solid #ccc; padding: 5px;"><p>Please answer the following questions as they pertain to _____ only. Note that all questions in this survey pertain only to interscholastic sports for high school students (grades 9-12). If your school also serves younger students, please exclude them from your responses.</p></div> <ol style="list-style-type: none">1. Did _____ offer at least one interscholastic sport in school year (SY) 2015-16? <i>(Check one.)</i><ul style="list-style-type: none"><input type="radio"/> Yes<input type="radio"/> No2. Is _____ coeducational or single-sex? <i>(Check one.)</i><ul style="list-style-type: none"><input type="radio"/> Coeducational<input type="radio"/> Single-sex3. Is _____ a charter school? <i>(Check one.)</i><ul style="list-style-type: none"><input type="radio"/> Yes<input type="radio"/> No4. We are interested in interscholastic sports for students in grades 9-12 only. Which of these grades does _____ serve? <i>(Check all that apply.)</i><ul style="list-style-type: none"><input type="checkbox"/> Grade 9

**Appendix II: Survey of Public High School
Athletics Administrators**

- Grade 10
- Grade 11
- Grade 12
- My school does not serve any of these grades.

5. To your knowledge, does your school district have a Title IX coordinator?

(Check one.)

- Yes
 - No
 - Don't know
-

Appendix II: Survey of Public High School Athletics Administrators

Definitions

Interscholastic sports: Team-based organized sports activities that offer competition among schools. A sport is a distinct sport, such as football, basketball, soccer, swimming, or tennis. Cheerleading/ spirit squads and dance teams are considered sports only if their primary purpose is to provide athletic competition at the interscholastic level rather than to support or promote other athletic activities. Include any interscholastic sports your school sponsors, regardless of whether your state sponsors a championship for that sport, but do NOT include intramural or club sports.

Sports teams: Refers to the competitive-level teams of each interscholastic sport, such as freshman team, junior varsity team, and varsity team.

Girls' sports teams: are those in which only female students participate. If male and female students practice together, but compete separately, report the female students as a team under this category.

Boys' sports teams: are those in which only male students participate. If male and female students practice together, but compete separately, report the male students as a team under this category.

Coed sports teams: are those in which both male and female students participate and compete together. If a team is open to students of both genders, but all participants in the team in school year 2015-16 were of only one gender, report that team as a girls' or boys' team depending on the gender of students participating.

Sports Offered to Students

6. What interscholastic sports teams did _____ offer in SY 2015-16?

The list of sports continues on subsequent pages of the survey.

For each sport that you check yes, please click the button on the right to answer follow-up questions about that sport. You will be asked for which gender(s) and at what level(s) of competition (e.g. varsity, junior varsity, etc.) you offer the sport.

<p>6a. Air Riflery (Check one.)</p> <p><input type="radio"/> Yes</p> <p><input type="radio"/> No</p> <p><input type="radio"/> Don't know</p>	<p>Please click on the button below to answer follow-up questions about this sport.</p> <p>New</p>
<p>6b. Archery (Check one.)</p> <p><input type="radio"/> Yes</p> <p><input type="radio"/> No</p> <p><input type="radio"/> Don't know</p>	<p>Please click on the button below to answer follow-up questions about this sport.</p> <p>New</p>
<p>6c. Badminton (Check one.)</p> <p><input type="radio"/> Yes</p> <p><input type="radio"/> No</p> <p><input type="radio"/> Don't know</p>	<p>Please click on the button below to answer follow-up questions about this sport.</p> <p>New</p>
<p>6d. Baseball (Check one.)</p> <p><input type="radio"/> Yes</p> <p><input type="radio"/> No</p> <p><input type="radio"/> Don't know</p>	<p>Please click on the button below to answer follow-up questions about this sport.</p> <p>New</p>
<p>6e. Basketball (Check one.)</p> <p><input type="radio"/> Yes</p> <p><input type="radio"/> No</p> <p><input type="radio"/> Don't know</p>	<p>Please click on the button below to answer follow-up questions about this sport.</p> <p>New</p>
<p>6f. Bocce (Check one.)</p> <p><input type="radio"/> Yes</p> <p><input type="radio"/> No</p>	<p>Please click on the button below to answer follow-up questions about this sport.</p> <p>New</p>

Appendix II: Survey of Public High School
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Don't know

6g. Bowling
(Check one.)

Yes
 No
 Don't know

Please click on the button below to answer follow-up questions about this sport.

[New](#)

Appendix II: Survey of Public High School Athletics Administrators

Sports Offered to Students (continued)		
6h. Competitive Dance Team (Check one.) <input type="radio"/> Yes <input type="radio"/> No <input type="radio"/> Don't know		Please click on the button below to answer follow-up questions about this sport. New
6i. Competitive Spirit Squad/ Cheerleading (Check one.) <input type="radio"/> Yes <input type="radio"/> No <input type="radio"/> Don't know		Please click on the button below to answer follow-up questions about this sport. New
6j. Crew (Check one.) <input type="radio"/> Yes <input type="radio"/> No <input type="radio"/> Don't know		Please click on the button below to answer follow-up questions about this sport. New
6k. Cross Country (Check one.) <input type="radio"/> Yes <input type="radio"/> No <input type="radio"/> Don't know		Please click on the button below to answer follow-up questions about this sport. New
6l. Decathlon (Check one.) <input type="radio"/> Yes <input type="radio"/> No <input type="radio"/> Don't know		Please click on the button below to answer follow-up questions about this sport. New
6m. Drill Team (Check one.) <input type="radio"/> Yes <input type="radio"/> No <input type="radio"/> Don't know		Please click on the button below to answer follow-up questions about this sport. New
6n. Equestrian (Check one.) <input type="radio"/> Yes <input type="radio"/> No <input type="radio"/> Don't know		Please click on the button below to answer follow-up questions about this sport. New
6o. Fencing (Check one.) <input type="radio"/> Yes <input type="radio"/> No <input type="radio"/> Don't know		Please click on the button below to answer follow-up questions about this sport. New

Appendix II: Survey of Public High School Athletics Administrators

Sports Offered to Students (continued)	
<p>6p. Field Hockey (Check one.)</p> <p><input type="radio"/> Yes <input type="radio"/> No <input type="radio"/> Don't know</p>	<p>Please click on the button below to answer follow-up questions about this sport.</p> <p>New</p>
<p>6q. Flag Football (Check one.)</p> <p><input type="radio"/> Yes <input type="radio"/> No <input type="radio"/> Don't know</p>	<p>Please click on the button below to answer follow-up questions about this sport.</p> <p>New</p>
<p>6r. Football (Check one.)</p> <p><input type="radio"/> Yes <input type="radio"/> No <input type="radio"/> Don't know</p>	<p>Please click on the button below to answer follow-up questions about this sport.</p> <p>New</p>
<p>6s. Golf (Check one.)</p> <p><input type="radio"/> Yes <input type="radio"/> No <input type="radio"/> Don't know</p>	<p>Please click on the button below to answer follow-up questions about this sport.</p> <p>New</p>
<p>6t. Gymnastics (Check one.)</p> <p><input type="radio"/> Yes <input type="radio"/> No <input type="radio"/> Don't know</p>	<p>Please click on the button below to answer follow-up questions about this sport.</p> <p>New</p>
<p>6u. Heptathlon (Check one.)</p> <p><input type="radio"/> Yes <input type="radio"/> No <input type="radio"/> Don't know</p>	<p>Please click on the button below to answer follow-up questions about this sport.</p> <p>New</p>
<p>6v. Ice Hockey (Check one.)</p> <p><input type="radio"/> Yes <input type="radio"/> No <input type="radio"/> Don't know</p>	<p>Please click on the button below to answer follow-up questions about this sport.</p> <p>New</p>
<p>6w. Judo (Check one.)</p> <p><input type="radio"/> Yes <input type="radio"/> No <input type="radio"/> Don't know</p>	<p>Please click on the button below to answer follow-up questions about this sport.</p> <p>New</p>

Appendix II: Survey of Public High School Athletics Administrators

Sports Offered to Students (continued)		
6x. Lacrosse (Check one.) <input type="radio"/> Yes <input type="radio"/> No <input type="radio"/> Don't know		Please click on the button below to answer follow-up questions about this sport. New
6y. Mountain Biking (Check one.) <input type="radio"/> Yes <input type="radio"/> No <input type="radio"/> Don't know		Please click on the button below to answer follow-up questions about this sport. New
6z. Riflery (Check one.) <input type="radio"/> Yes <input type="radio"/> No <input type="radio"/> Don't know		Please click on the button below to answer follow-up questions about this sport. New
6aa. Rodeo (Check one.) <input type="radio"/> Yes <input type="radio"/> No <input type="radio"/> Don't know		Please click on the button below to answer follow-up questions about this sport. New
6ab. Roller Hockey (Check one.) <input type="radio"/> Yes <input type="radio"/> No <input type="radio"/> Don't know		Please click on the button below to answer follow-up questions about this sport. New
6ac. Rugby (Check one.) <input type="radio"/> Yes <input type="radio"/> No <input type="radio"/> Don't know		Please click on the button below to answer follow-up questions about this sport. New
6ad. Sailing (Check one.) <input type="radio"/> Yes <input type="radio"/> No <input type="radio"/> Don't know		Please click on the button below to answer follow-up questions about this sport. New
6ae. Sand Volleyball (Check one.) <input type="radio"/> Yes <input type="radio"/> No <input type="radio"/> Don't know		Please click on the button below to answer follow-up questions about this sport. New

Appendix II: Survey of Public High School Athletics Administrators

Sports Offered to Students (continued)		
6af. Skiing – Alpine (Check one.) <input type="radio"/> Yes <input type="radio"/> No <input type="radio"/> Don't know		Please click on the button below to answer follow-up questions about this sport. New
6ag. Skiing – Cross Country (Check one.) <input type="radio"/> Yes <input type="radio"/> No <input type="radio"/> Don't know		Please click on the button below to answer follow-up questions about this sport. New
6ah. Snowboarding (Check one.) <input type="radio"/> Yes <input type="radio"/> No <input type="radio"/> Don't know		Please click on the button below to answer follow-up questions about this sport. New
6ai. Soccer (Check one.) <input type="radio"/> Yes <input type="radio"/> No <input type="radio"/> Don't know		Please click on the button below to answer follow-up questions about this sport. New
6aj. Softball – Fast Pitch (Check one.) <input type="radio"/> Yes <input type="radio"/> No <input type="radio"/> Don't know		Please click on the button below to answer follow-up questions about this sport. New
6ak. Softball – Slow Pitch (Check one.) <input type="radio"/> Yes <input type="radio"/> No <input type="radio"/> Don't know		Please click on the button below to answer follow-up questions about this sport. New
6al. Surfing (Check one.) <input type="radio"/> Yes <input type="radio"/> No <input type="radio"/> Don't know		Please click on the button below to answer follow-up questions about this sport. New
6am. Swimming & Diving (Check one.) <input type="radio"/> Yes <input type="radio"/> No <input type="radio"/> Don't know		Please click on the button below to answer follow-up questions about this sport. New

Appendix II: Survey of Public High School Athletics Administrators

Sports Offered to Students (continued)		
6an. Synchronized Swimming (Check one.) <input type="radio"/> Yes <input type="radio"/> No <input type="radio"/> Don't know		Please click on the button below to answer follow-up questions about this sport. New
6ao. Team Tennis (Check one.) <input type="radio"/> Yes <input type="radio"/> No <input type="radio"/> Don't know		Please click on the button below to answer follow-up questions about this sport. New
6ap. Tennis (Check one.) <input type="radio"/> Yes <input type="radio"/> No <input type="radio"/> Don't know		Please click on the button below to answer follow-up questions about this sport. New
6aq. Track and Field – Indoor (Check one.) <input type="radio"/> Yes <input type="radio"/> No <input type="radio"/> Don't know		Please click on the button below to answer follow-up questions about this sport. New
6ar. Track and Field – Outdoor (Check one.) <input type="radio"/> Yes <input type="radio"/> No <input type="radio"/> Don't know		Please click on the button below to answer follow-up questions about this sport. New
6as. Trap Shooting (Check one.) <input type="radio"/> Yes <input type="radio"/> No <input type="radio"/> Don't know		Please click on the button below to answer follow-up questions about this sport. New
6at. Volleyball (Check one.) <input type="radio"/> Yes <input type="radio"/> No <input type="radio"/> Don't know		Please click on the button below to answer follow-up questions about this sport. New
6au. Water Polo (Check one.) <input type="radio"/> Yes <input type="radio"/> No <input type="radio"/> Don't know		Please click on the button below to answer follow-up questions about this sport. New

**Appendix II: Survey of Public High School
Athletics Administrators**

Sports Offered to Students (continued)	
<p>6av. Weightlifting (Check one.)</p> <p><input type="radio"/> Yes <input type="radio"/> No <input type="radio"/> Don't know</p>	<p>Please click on the button below to answer follow-up questions about this sport.</p> <p>New</p>
<p>6aw. Wrestling (Check one.)</p> <p><input type="radio"/> Yes <input type="radio"/> No <input type="radio"/> Don't know</p>	<p>Please click on the button below to answer follow-up questions about this sport.</p> <p>New</p>
<p>6ax. Other (Check one.)</p> <p><input type="radio"/> Yes <input type="radio"/> No <input type="radio"/> Don't know</p>	<p>Please click on the button below to answer follow-up questions about this sport.</p> <p>New</p>

Appendix II: Survey of Public High School Athletics Administrators

Sports Participation

7. What was the total number of girls participating in interscholastic sports at _____ in SY 2015-16?

_____ **Don't know**
 girls

8. What was the total number of boys participating in interscholastic sports at _____ in SY 2015-16?

_____ **Don't know**
 boys

9. Which of the following types of sources did you consider when providing the number of girls and boys participating in sports?

	Yes	No
9a. Paper files	<input type="radio"/>	<input type="radio"/>
9b. Electronic spreadsheets	<input type="radio"/>	<input type="radio"/>
9c. Database or data management system	<input type="radio"/>	<input type="radio"/>
9d. State or district reports	<input type="radio"/>	<input type="radio"/>
9e. Own personal knowledge	<input type="radio"/>	<input type="radio"/>
9f. Other (please specify below)	<input type="radio"/>	<input type="radio"/>

What other sources did you consider?

10. To the best of your knowledge, how much do the following factors encourage or discourage *girls'* sports participation at _____?

	Greatly encourage	Somewhat encourage	Neither encourage nor discourage	Somewhat discourage	Greatly discourage	Don't know
10a. Number of participation opportunities offered by the school	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
10b. Level of student interest in sports offered by the school	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
10c. Level of student interest in working with specific coaches of school teams	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
10d. Participation costs to the student	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
10e. Students' competing responsibilities (e.g., schoolwork, family obligations, or other school activities)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
10f. Access to club or feeder programs in the community for younger children	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

**Appendix II: Survey of Public High School
Athletics Administrators**

	Greatly encourage	Somewhat encourage	Neither encourage nor discourage	Somewhat discourage	Greatly discourage	Don't know
10g. Presence of club teams that high school students may choose over school teams	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
10h. Other (please specify below)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

What other factors encourage or discourage girls' sports participation?

11. To the best of your knowledge, how much do the following factors encourage or discourage boys' sports participation at _____?

	Greatly encourage	Somewhat encourage	Neither encourage nor discourage	Somewhat discourage	Greatly discourage	Don't know
11a. Number of participation opportunities offered by the school	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
11b. Level of student interest in sports offered by the school	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
11c. Level of student interest in working with specific coaches of school teams	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
11d. Participation costs to the student	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
11e. Students' competing responsibilities (e.g., schoolwork, family obligations, or other school activities)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
11f. Access to club or feeder programs in the community for younger children	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
11g. Presence of club teams that high school students may choose over school teams	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
11h. Other (please specify below)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

What other factors encourage or discourage boys' sports participation?

**Appendix II: Survey of Public High School
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Gender Equity

12. To the best of your knowledge, in the last 2 school years has _____ conducted assessments of any of the following to encourage gender equity?

	Conducted	Did not conduct	Don't know
12a. Equipment available to girls' and boys' sports teams	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
12b. Uniforms available to girls' and boys' sports teams	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
12c. Facilities available to girls' and boys' sports teams	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
12d. Practice times for girls' and boys' sports teams	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
12e. Competition schedules for girls' and boys' sports teams	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
12f. Travel opportunities for girls' and boys' sports teams	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
12g. Other (please specify below)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

In your opinion, how challenging, if at all, was it to assess equipment available to girls' and boys' sports teams?

(Check one.)

- Extremely challenging
- Very challenging
- Moderately challenging
- Slightly challenging
- Not at all challenging
- Don't know

In your opinion, how challenging, if at all, was it to assess uniforms available to girls' and boys' sports teams?

(Check one.)

- Extremely challenging
- Very challenging
- Moderately challenging
- Slightly challenging
- Not at all challenging
- Don't know

In your opinion, how challenging, if at all, was it to assess facilities available to girls' and boys' sports teams?

(Check one.)

- Extremely challenging
- Very challenging
- Moderately challenging
- Slightly challenging
- Not at all challenging
- Don't know

In your opinion, how challenging, if at all, was it to assess practice times available to girls' and boys' sports teams?

(Check one.)

- Extremely challenging
- Very challenging
- Moderately challenging
- Slightly challenging
- Not at all challenging
- Don't know

In your opinion, how challenging, if at all, was it to assess competition schedules available to girls' and boys' sports teams?

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(Check one.)

- Extremely challenging
- Very challenging
- Moderately challenging
- Slightly challenging
- Not at all challenging
- Don't know

In your opinion, how challenging, if at all, was it to assess travel opportunities available to girls' and boys' sports teams?

(Check one.)

- Extremely challenging
- Very challenging
- Moderately challenging
- Slightly challenging
- Not at all challenging
- Don't know

What other assessments has your school conducted?

In your opinion, how challenging, if at all, was it to conduct these other assessments?

(Check one.)

- Extremely challenging
- Very challenging
- Moderately challenging
- Slightly challenging
- Not at all challenging
- Don't know

13. To the best of your knowledge, which other activities has _____ conducted related to gender equity in its sports programs in the last 2 school years?

	Conducted	Did not conduct	Don't know
13a. Calculated substantial proportionality in sports participation by gender	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
13b. Surveyed students about their sports interests	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
13c. Analyzed past participation numbers in interscholastic sports as an indicator of student interest and/or ability	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
13d. Analyzed participation in intramural and/or community sports leagues as an indicator of student interest and/or ability	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
13e. Conducted other activities to monitor student sports interests	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
13f. Added and/or changed what sports the school offers based on requests from students of the underrepresented sex	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
13g. Monitored and/or directed the spending of state or local	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

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	Conducted	Did not conduct	Don't know
funds to promote equity			
13h. Monitored and/or directed booster club spending to promote equity	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
13i. Supported sports teams for younger students in the community that train future high school athletes	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
13j. Trained and/or provided guidance to coaches and other school sports staff about Title IX requirements	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
13k. Worked with Title IX coordinator to help ensure that the needs of the underrepresented sex are met	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
13l. Other (please specify below)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

In your opinion, how challenging, if at all, was it to calculate substantial proportionality in sports participation by gender?
(Check one.)

- Extremely challenging
- Very challenging
- Moderately challenging
- Slightly challenging
- Not at all challenging
- Don't know

In your opinion, how challenging, if at all, was it to survey students about their sports interests?
(Check one.)

- Extremely challenging
- Very challenging
- Moderately challenging
- Slightly challenging
- Not at all challenging
- Don't know

In your opinion, how challenging, if at all, was it to analyze past participation numbers in interscholastic sports as an indicator of student interest and/or ability?
(Check one.)

- Extremely challenging
- Very challenging
- Moderately challenging
- Slightly challenging
- Not at all challenging
- Don't know

In your opinion, how challenging, if at all, was it to analyze participation in intramural and/or community sports leagues as an indicator of student interest and/or ability?
(Check one.)

- Extremely challenging
- Very challenging
- Moderately challenging
- Slightly challenging
- Not at all challenging
- Don't know

In your opinion, how challenging, if at all, was it to conduct other activities to monitor student sports interests?

**Appendix II: Survey of Public High School
Athletics Administrators**

(Check one.)

- Extremely challenging
- Very challenging
- Moderately challenging
- Slightly challenging
- Not at all challenging
- Don't know

In your opinion, how challenging, if at all, was it to add and/or change what sports the school offers based on requests from students of the underrepresented sex?

(Check one.)

- Extremely challenging
- Very challenging
- Moderately challenging
- Slightly challenging
- Not at all challenging
- Don't know

In your opinion, how challenging, if at all, was it to monitor and/or direct the spending of state or local funds to promote equity?

(Check one.)

- Extremely challenging
- Very challenging
- Moderately challenging
- Slightly challenging
- Not at all challenging
- Don't know

In your opinion, how challenging, if at all, was it to monitor and/or direct booster club spending to promote equity?

(Check one.)

- Extremely challenging
- Very challenging
- Moderately challenging
- Slightly challenging
- Not at all challenging
- Don't know

In your opinion, how challenging, if at all, was it to support sports teams for younger students in the community that train future high school athletes?

(Check one.)

- Extremely challenging
- Very challenging
- Moderately challenging
- Slightly challenging
- Not at all challenging
- Don't know

In your opinion, how challenging, if at all, was it to train and/or provide guidance to coaches and other school sports staff about Title IX requirements?

(Check one.)

- Extremely challenging
- Very challenging
- Moderately challenging
- Slightly challenging
- Not at all challenging
- Don't know

In your opinion, how challenging, if at all, was it to work with Title IX coordinator to help ensure that the needs of the underrepresented sex are met?

(Check one.)

Appendix II: Survey of Public High School Athletics Administrators

- Extremely challenging
- Very challenging
- Moderately challenging
- Slightly challenging
- Not at all challenging
- Don't know

What other activities has your school conducted?

In your opinion, how challenging, if at all, was it to conduct these other activities?

(Check one.)

- Extremely challenging
- Very challenging
- Moderately challenging
- Slightly challenging
- Not at all challenging
- Don't know

14. In your opinion, how much of a challenge, if any, does each of the following factors pose to encouraging gender equity in your school's sports programs?

	Extreme challenge	Large challenge	Moderate challenge	Slight challenge	Not a challenge	Not applicable	Don't know
14a. Uneven spending by booster club(s)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
14b. Uneven support by corporate or other sponsors	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
14c. Level of student interest in sports	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
14d. Difficulty interpreting Title IX requirements	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
14e. Lack of understanding of Title IX requirements by coaches or other staff	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
14f. Lack of familiarity with the role of Title IX coordinator and how s/he can assist in promoting equity	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
14g. Other (please specify below)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

What other factor(s) pose a challenge to encouraging gender equity in your school's sports programs?

15. How often do you receive guidance or assistance related to gender equity in your school's sports programs from the following entities?

	Frequently	Sometimes	Rarely	Never	Don't know
15a. U.S. Department of Education	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
15b. State department of education	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
15c. Title IX Coordinator	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

**Appendix II: Survey of Public High School
Athletics Administrators**

	Frequently	Sometimes	Rarely	Never	Don't know
15d. Professional organizations (e.g., state or national associations)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

How helpful was the guidance or assistance you received from the U.S. Department of Education?
(Check one.)

- Extremely helpful
- Very helpful
- Moderately helpful
- Slightly helpful
- Not at all helpful
- No opinion

How helpful was the guidance or assistance you received from the state department of education?
(Check one.)

- Extremely helpful
- Very helpful
- Moderately helpful
- Slightly helpful
- Not at all helpful
- No opinion

How helpful was the guidance or assistance you received from the Title IX Coordinator?
(Check one.)

- Extremely helpful
- Very helpful
- Moderately helpful
- Slightly helpful
- Not at all helpful
- No opinion

How helpful was the guidance or assistance you received from the professional organizations (e.g., state or national associations)?
(Check one.)

- Extremely helpful
- Very helpful
- Moderately helpful
- Slightly helpful
- Not at all helpful
- No opinion

16. Would you like additional guidance or assistance related to gender equity in school sports?
(Check one.)

- Yes
- No

16a. What type of guidance or assistance would be most helpful to you?
(Check all that apply.)

- FAQs or other guidance documents
- Conferences
- Webinars
- Assistance with specific issues or questions
- Support from Title IX coordinator
- Mentoring or on-the-job training from more experienced athletics administrators
- Collaboration with athletics administrators across your state or in other states
- Other

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What other type of guidance or assistance would be most helpful to you?



**Appendix II: Survey of Public High School
Athletics Administrators**

Funding and Expenditures

17. Which of the following best describes the booster clubs and/or parent organizations that support the sports teams at _____?

(Check one.)

- My school does not have booster clubs or parent organizations for its sports teams.
- My school has one booster club or parent organization that supports all its sports teams.
- My school has a booster club or parent organization for each sport and gender (where applicable). For instance, boys' basketball and girls' basketball have separate booster clubs.
- My school has a booster club or parent organization supporting both genders of each sport (where applicable). For instance, one booster club supports both boys' and girls' basketball.
- Other
- Don't know

17a. Which of the following best describes your involvement as athletics administrator, or the involvement of your school's coaches, in directing how booster clubs and/or parent organizations at _____ use their funds?

(Check one.)

- The school's coaches and I have no involvement in how booster clubs or parent organizations use their funds.
- I and/or the coaches advise booster clubs or parent organizations on how to use their funds, but do not approve their expenditures.
- Booster clubs or parent organization expenditures must be approved by me and/or other school leadership or coaches, but we do not have access to their funds.
- I and/or the coaches have access to booster club or parent organization funds and can use them as needed for sports team expenses.
- Other
- Don't know

What is your involvement as athletics administrator, or the involvement of your school's coaches, in directing how booster clubs and/or parent organizations use their funds?

How would you describe the booster clubs and/or parent organizations that support sports teams?

Which of the following best describes your involvement as athletics administrator, or the involvement of your school's coaches, in directing how booster clubs and/or parent organizations at _____ use their funds?

(Check one.)

- The school's coaches and I have no involvement in how booster clubs or parent organizations use their funds.
- I and/or the coaches advise booster clubs or parent organizations on how to use their funds, but do not approve their expenditures.
- Booster clubs or parent organization expenditures must be approved by me and/or other school leadership or coaches, but we do not have access to their funds.
- I and/or the coaches have access to booster club or parent organization funds and can use them as needed for sports team expenses.
- Other
- Don't know

What is your involvement as athletics administrator, or the involvement of your school's coaches, in directing how booster clubs and/or parent organizations use

**Appendix II: Survey of Public High School
Athletics Administrators**

their funds?

18. Which of the following statements best describes how compensation (stipends or salaries) for coaches of interscholastic sports teams is determined at _____ and in the district?

(Check one.)

- Compensation is determined by the **district** (or in district-level negotiations with the teacher's union), and all coaches in my district receive the same compensation, regardless of team or level.
- Compensation is determined by the **district** (or in district-level negotiations with the teacher's union), and may vary.
- Compensation is determined by the **school** (or in school-level negotiations with the teacher's union), and all coaches in my school receive the same compensation, regardless of team or level.
- Compensation is determined by the **school** (or in school-level negotiations with the teacher's union), and may vary.
- Other
- Don't know

How is compensation (stipends or salaries) for coaches of interscholastic sports teams determined?

18a. What factors are used in determining compensation for coaches of interscholastic sports teams?

(Check all that apply.)

- Sport
- Level (e.g., Varsity, Junior Varsity, Freshman)
- Gender of team (girls vs. boys)
- Coach's years of experience or qualifications
- Other
- Don't know

18b. What other factors are used in determining compensation for coaches of interscholastic sports teams?

19. Do you or other officials at _____ maintain data on funding your school's sports program receives from the following sources?

	Yes	No	Not applicable (do not receive funding from this source)
19a. State and/or local government funds	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
19b. Gate receipts	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
19c. Concessions or other sales	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

**Appendix II: Survey of Public High School
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	Yes	No	Not applicable (do not receive funding from this source)
19d. Booster club or parent group fundraising	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
19e. Team fundraising	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
19f. Corporate sponsorships	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
19g. Other donations	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
19h. Student fees	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
19i. Other (please specify below)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

For what other source(s) of funding do you maintain data?

20. Do you or other officials at _____ maintain data on your school's expenditures on sports?

(Check one.)

- Yes
- No

20A. Do these data allow you to look at your sports expenditures by the following?

	Yes	No	Don't know
Gender (boys' vs. girls' sports)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Sport	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Expenditure category (e.g., equipment and supplies, uniforms, transportation)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

20B. Do these data include expenditures of funds from the following sources?

	Yes	No	Don't know	Not applicable (do not receive funding from this source)
State and/or local government funds	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Gate receipts	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Concessions or other sales	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Booster club or parent group fundraising	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Team fundraising	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Corporate sponsorships	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other donations	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Student fees	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other (please specify below)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

What other expenditure data is included?

**Appendix II: Survey of Public High School
Athletics Administrators**

21. Is financial data for the sports program at _____ made publicly available?

(Check one.)

- Yes
- No

21A. How are financial data for the sports program at _____ made publicly available?

	Yes	No	Don't know
Budget data are published online	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Budget data are published, but not online	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Expenditure data are published online	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Expenditure data are published, but not online	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Data are not published but are available upon request	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other <i>(please specify below)</i>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

How else are financial data for the sports program made publicly available?

21B. To the best of your knowledge, why do you or the school or district make these data publicly available?

(Check all that apply.)

- State law
- Local law
- State policy
- Local policy, including school or school board policy
- Transparency and/or good practice
- Other
- Don't know

Why else are these data made publicly available?

22. What, if anything, else would you like to tell us about interscholastic sports at _____?
(Answering this question is optional. You may use this space to clarify or provide additional context on your other responses. You may also use it to provide any additional information you think we should know.)

**Appendix II: Survey of Public High School
Athletics Administrators**

23. May GAO staff call you for a follow-up discussion on your responses?

(Check one.)

- Yes
- No

23a. As part of this follow-up discussion, would you be willing to provide any data you may have on expenditures on interscholastic sports at your school?

(Check one.)

- Yes
- No
- Not applicable (I do not have any data on expenditures)

Submit survey to GAO

24. Is your survey complete and ready to be submitted to GAO?

(Check one.)

- Yes, this survey is complete.
- No, this survey is not complete.

Print responses

Exit and save

Appendix III: Comments from the Department of Education



UNITED STATES DEPARTMENT OF EDUCATION

OFFICE FOR CIVIL RIGHTS

THE ASSISTANT SECRETARY

April 19, 2018

Jacqueline M. Nowicki
Director
Education, Workforce, and Income Security Issues
U.S. Government Accountability Office
441 G Street, NW
Washington, DC 20548

Dear Ms. Nowicki:

I am writing in response to the recommendation made in the U.S. Government Accountability Office (GAO) draft report, "High School Sports: Many Schools Encouraged Equal Opportunities, but Education Could Further Help Athletics Administrators under Title IX" (GAO-18-425). We appreciate the opportunity to comment on the draft report on behalf of the U.S. Department of Education (Department).

We appreciate GAO's thorough review of measures that public high schools and athletics administrators have taken to encourage equal athletic opportunities for female and male students, and factors that affect female and male students' participation levels in public high school sports programs. The Department is committed to ensuring that public high schools comply with the requirements of Title IX of the Education Amendments of 1972 (Title IX) and the implementing regulations on athletic participation opportunities, and agrees that Title IX coordinators play an important role in these efforts. The Department's Office for Civil Rights (OCR) is committed to the vigorous enforcement of Title IX regarding athletic participation opportunities.

The Department has undertaken endeavors to clarify the roles of Title IX coordinators, including with respect to encouraging equal athletic opportunities based on sex, as this report recognizes. The report acknowledges that the Department has developed and disseminated policy and guidance in this area, and that the Department continues to address these issues through OCR investigations responding to complaints, monitoring, and technical assistance. The report suggests that there are additional actions the Department could undertake to encourage Title IX coordinators to help ensure equal athletic opportunities. The report identified a recommendation, and we provide our response to this recommendation below.

Recommendation: *The U.S. Department of Education, Assistant Secretary for Civil Rights, should determine the extent to which Title IX coordinators at the K-12 level are aware of and using the tools recommended in OCR's existing guidance and any barriers preventing their use of this guidance, and use this information in OCR's efforts to encourage them to work with athletics administrators on ensuring equal athletic opportunities.*

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The Department of Education's mission is to promote student achievement and preparation for global competitiveness by fostering educational excellence and ensuring equal access.

Response: OCR is committed to vigorously protecting the civil rights of all students, including ensuring that public K-12 schools comply with Title IX when it comes to athletics. OCR's enforcement actions in this regard demonstrate that commitment. Further, and consistent with its commitment to ensuring Title IX compliance, OCR partially concurs with this recommendation, to the extent that when OCR conducts investigations in response to complaints, it will look for opportunities to examine whether Title IX coordinators at the K-12 level are aware of, and using, the tools in OCR's guidance. Separately, when OCR engages in technical assistance, OCR will encourage Title IX coordinators to work with athletics administrators to ensure equal athletic opportunities for all students. All of OCR's current guidance is already available on its webpage and can be accessed by all members of the public, including Title IX coordinators and athletics administrators.

Additionally, OCR will also consider this recommendation as it relates to the Department and OCR's communications practices. The Department and OCR frequently review agency communications practices, and will keep this recommendation in mind during this review process to determine how OCR can further ensure that Title IX coordinators are aware of, and using the tools in, OCR's guidance, and how OCR can continue to encourage Title IX coordinators to work with public school athletics administrators to ensure equal athletic opportunities.

We appreciate the opportunity to review the draft report and comment on the recommendations. I am also enclosing a document with technical comments.

Sincerely,



Candice Jackson
Acting Assistant Secretary for Civil Rights

Enclosure

Appendix IV: GAO Contact and Staff Acknowledgements

GAO Contact

Jacqueline M. Nowicki, (617) 788-0580, nowickij@gao.gov

Staff Acknowledgements

In addition to the individual named above, Bill MacBlane (Assistant Director), Lauren Gilbertson and Jamila Jones Kennedy (Analysts-in-Charge), Christina S. Cantor, MacKenzie Cooper, Jill Lacey, Benjamin Sinoff, Andrew Stavisky, Sonya Vartivarian, and Khristi Wilkins made key contributions to this report. Also contributing to this report were James Bennett, Deborah Bland, Barbara Bovbjerg, Randy De Leon, Holly Dye, David Forgosh, Amy MacDonald, and Sheila R. McCoy.

Related GAO Products

K-12 Education: High School Sports Access and Participation.
[GAO-17-754R](#). Washington, D.C.: September 14, 2017.

Child Welfare: Federal Agencies Can Better Support State Efforts to Prevent and Respond to Sexual Abuse by School Personnel. [GAO-14-42](#). Washington, D.C.: January 27, 2014.

K-12 Education: School-Based Physical Education and Sports Programs.
[GAO-12-350](#). Washington, D.C.: February 29, 2012.

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