REVIEW OF GENDER EQUITY IN
INTERSCHOLASTIC ATHLETIC OPPORTUNITIES IN
MINNESOTA'S SECONDARY SCHOOLS

OFFICE OF THE ATTORNEY GENERAL
1998
This report complies with Minnesota Laws 1997, chapter 202, article 1, section 6.

Every effort has been taken to ensure the accuracy of the data included in this report. We apologize for any errors which may have occurred.
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No person in the United States shall, on the basis of sex, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any education program or activity receiving federal financial assistance.

Title IX of the Education Amendments of 1972, United States Congress, June 12, 1972
I. Introduction

Title IX became law more than twenty-five years ago. Recently, many articles have been published and celebrations held lauding the growth of opportunities for women in high school athletics. The growth is undeniable: prior to Title IX, fewer than 300,000 high school girls throughout the United States played interscholastic sports. Today, the number of girls involved in high school athletics has risen to 2.4 million.

In observance of Title IX's twenty-fifth anniversary, the Minnesota Legislature asked the Office of the Attorney General to examine the progress of Minnesota high schools with respect to gender equity in interscholastic athletics. This legislative request was not the first of its kind. In 1992, Title IX's twentieth anniversary, the Legislature also asked the Attorney General to examine progress on gender equity in high school sports. The Attorney General worked with an independent consultant to examine participation in athletics by gender and athletic expenditures by gender, ranking all of the districts in the state. Overall, the 1992 report concluded that the state was making progress toward sports equity but that it was a goal which had not yet been attained.

The current study concludes that although the growth of athletic opportunities for high school girls has been steady, the opportunities for girls still lag behind those afforded their male classmates in many parts of the state. Title IX's mandate for equity was not aspirational; it was absolute. Under the law, schools should have provided equal opportunities in 1972. Twenty-five years later, some opportunities are not comparable for girls.

Following the Attorney General's 1992 report, an ad hoc committee launched a massive education effort designed to heighten the awareness of gender equity -- and the law that relates to it -- in every school district in the state. The committee, a joint venture of the Minnesota Department of Education ("Department")\(^1\) and the Minnesota State High School League.
(“League”), developed a comprehensive self-study guide for schools. The guide detailed specific steps schools could take to increase the participation of girls in athletics and thereby secure for girls the benefits of athletic activity that boys have known for years. The self-study guide was designed to lead schools through the U.S. Department of Education’s equity factors.2

Measuring even a single school’s compliance with Title IX is a complex task. The U.S. Department of Education has given schools detailed guidance through publication of regulations and policy interpretations, which list factors to consider when determining the relative equity of programs for girls and boys. The factors immediately applicable to secondary schools include:

1. Accommodation of Interest and Abilities
2. Equipment and Supplies
3. Scheduling of Games and Practice Time
4. Travel and Per Diem Allowance
5. Opportunity to Receive Coaching and Academic Tutoring: Assignment and Compensation of Coaches
6. Locker Rooms, Practice and Competitive Facilities
7. Medical and Training Facilities and Services
8. Publicity
9. Support Services
10. Final Factors, including athletic fees and awards.

The first equity factor that schools were encouraged to assess was Accommodation of Interests and Abilities. A key component of the analysis to determine whether students' sports interests are being accommodated is student surveys. Federal Title IX policy interpretation outlines three criteria which may be considered consecutively to assess the opportunity for individuals of both sexes to compete in athletics programs.

A. Whether interscholastic level participation opportunities for male and female students are provided in numbers substantially proportionate to their respective enrollments.

B. Where the members of one sex have been and are underrepresented among interscholastic athletes, whether the institution can show a history and continuing practice of program expansion which is demonstrably responsive to the developing interests and abilities of that sex.

C. Where the members of one sex are underrepresented among interscholastic athletes, and the institution cannot show a continuing practice of program expansion such as that cited above, whether it can be demonstrated that the interests and abilities of the members of that sex have been fully and effectively accommodated by the present program.

School interest surveys are important because they provide evidence of school compliance with second and third criteria.

The Minnesota guide suggested the schools survey the sports interests of girls and boys at each school. This was consistent with an existing state law requirement that schools conduct a biennial determination of students’ interests. To facilitate this process, the committee developed a model interest survey. In the 1992-93 school year, the committee distributed the model survey to all schools in the state and instructed the schools on how to conduct the survey. The League instructed every district in the state to submit summary results to the League by April 1993. That was the only time survey results were centrally collected. Unfortunately, it was also the only time many schools conducted an interest survey.

In 1997, in its appropriation to the Office of the Attorney General, the Legislature specifically asked: Have schools implemented the committee’s suggestions contained in the 1993 Guide? As the Guide contained a comprehensive and lengthy list of suggestions, the Attorney General decided to focus on one specific suggestion that lays the foundation for equal athletic opportunity: Do schools conduct interest surveys of their students? As a by-product, our study yielded some information on accommodation of specific student sports interests as well.
As a result of our study, we found the following:

(1) Do schools survey the athletic interests of their students?

Most do not. Only ten percent of secondary schools regularly survey the sports interests of their students.

(2) Are schools accommodating girls' known interests?

Traditionally, girls have been interested in volleyball, basketball and softball, among other sports. Volleyball and basketball are available at all secondary schools in Minnesota. Softball is available at most secondary schools in Minnesota.

(3) Are schools accommodating girls' emerging interests?

Without interest survey data, emerging interests are difficult to track. Based on league participation, however, ice hockey is the fastest emerging athletic interest among girls. The Minnesota State High School League officially recognized girls' hockey in 1994. In 1998, 83 girls' teams competed in league play. Through cooperative arrangements, 129 different schools offered girls the opportunity to play hockey on the 83 teams.

(4) Do girls participate in interscholastic athletics in numbers substantially proportionate to their enrollments?

Girls' participation in athletics varies from school to school. Data tables included in this report will allow each school to review its status relative to other schools.

In this study of athletic opportunities for girls, the Attorney General analyzed data created in response to the two principal gender equity data creation mandates: (1) annual reports by schools/school districts on males and female student sports participation to the Department of Children, Families & Learning, which maintains the data on a computer database (Minn. Rules 3535.6000) and (2) the schools’ biennial determination of the sports interests of their male and female students (Minn. Rules 3535.3000). Schools use information gathered at the school building level in their efforts to provide equal opportunity for members of each sex. State law
does not require that any state agency collect the interest data, and it is not collected by the Department or the League. The Attorney General obtained the interest survey data presented in this report through requests to each school under the Minnesota Government Data Practices Act.

While limitations on the data available prevent detailed statewide analysis, the data the Attorney General was able to collect are presented here to provide a benchmark for measuring future growth.

II. Accommodation of Known Interests of Girls

The "Big Three" Sports

The interests of school age children in particular sports can be generalized to a certain extent. Girls traditionally have been highly interested in playing volleyball, basketball, and softball (hereinafter the "Big Three"), among other sports. Similarly, football, basketball, and baseball are identified as the "Big Three" of boys' sports. Historically, boys and girls have participated in large numbers in the Big Three sports when they are available. With the exception of football, these sports are relatively inexpensive to offer. In other words, offering the "Big Three" for girls is an easy, cheap, obvious, basically guaranteed way to offer opportunity for girls to participate in athletics.

Q: Are districts offering the most basic athletic choices for girls?

A. Generally, yes. 1995-96 data from the Department's MINCRIS database show that all districts in the state offer girls' volleyball and girls' basketball. Most districts, but not all, also offer girls' softball. Overall, the number of schools offering girls' softball has slowly but steadily risen since the League began sponsoring a state tournament in 1976-77. The greatest increase has been within the past two years when the number of teams increased by 60.
### NUMBER OF GIRLS' SOFTBALL TEAMS PARTICIPATING IN THE MINNESOTA HIGH SCHOOL LEAGUE 1980-1998

<table>
<thead>
<tr>
<th>YEAR</th>
<th>AA</th>
<th>A</th>
<th>TOTAL</th>
</tr>
</thead>
<tbody>
<tr>
<td>1976-77</td>
<td>*</td>
<td>*</td>
<td>117</td>
</tr>
<tr>
<td>1977-78</td>
<td>*</td>
<td>*</td>
<td>161</td>
</tr>
<tr>
<td>1978-79</td>
<td>*</td>
<td>*</td>
<td>182</td>
</tr>
<tr>
<td>1979-80</td>
<td>101</td>
<td>107</td>
<td>208</td>
</tr>
<tr>
<td>1980-81</td>
<td>103</td>
<td>141</td>
<td>244</td>
</tr>
<tr>
<td>1981-82</td>
<td>101</td>
<td>142</td>
<td>243</td>
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<tr>
<td>1982-83</td>
<td>111</td>
<td>131</td>
<td>242</td>
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<td>1983-84</td>
<td>99</td>
<td>141</td>
<td>240</td>
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<td>1984-85</td>
<td>104</td>
<td>151</td>
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<td>102</td>
<td>162</td>
<td>264</td>
</tr>
<tr>
<td>1986-87</td>
<td>101</td>
<td>186</td>
<td>269</td>
</tr>
<tr>
<td>1987-88</td>
<td>104</td>
<td>173</td>
<td>277</td>
</tr>
<tr>
<td>1988-89</td>
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<td>1989-90</td>
<td>96</td>
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<td>293</td>
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<td>1992-93</td>
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<td>1994-95</td>
<td>108</td>
<td>210</td>
<td>318</td>
</tr>
<tr>
<td>1995-96</td>
<td>110</td>
<td>210</td>
<td>320</td>
</tr>
<tr>
<td>1996-97</td>
<td>111</td>
<td>217</td>
<td>338</td>
</tr>
<tr>
<td>1997-98</td>
<td>121</td>
<td>259</td>
<td>380</td>
</tr>
</tbody>
</table>

* Not conducted in two classes

(Data provided by the Minnesota State High School League)
Q: How does girls' access to softball compare with boys' access to baseball?

A: There is still room for improvement. A survey by the Department using data from 1989-90 listed 74 schools which offered boys' baseball but did not offer girls' softball. Our study of 1995-96 data found that 24 schools offered boys' baseball but not girls' softball. While this appears to be a significant improvement, at closer look we found that, of the 24 schools, 15 were not part of the 1989-90 group of 74 schools identified in 1989-90 as offering baseball but not softball. It is curious that these schools appeared to move away from the trend towards equity. More information is need to explain this anomaly. We examined the 1995-96 data available on the 74 schools identified by the 1989-90 study.

1995-96 Sports Offerings of Schools Identified in 1989-90 as Offering Baseball But Not Softball

<table>
<thead>
<tr>
<th>74</th>
<th>Identified in 1989-90 as offering baseball but not softball</th>
</tr>
</thead>
<tbody>
<tr>
<td>24</td>
<td>Offered both baseball and softball by 1995-96</td>
</tr>
<tr>
<td>9</td>
<td>Offer only baseball in 1995-96</td>
</tr>
<tr>
<td>1</td>
<td>Offered neither baseball or softball in 1995-96</td>
</tr>
<tr>
<td>31</td>
<td>Ceased to operate under the same district number (school closed or consolidated with another school by 1995-96)</td>
</tr>
<tr>
<td>9</td>
<td>Provided incomplete reports in 1995-96 so all sports offered could not be ascertained</td>
</tr>
</tbody>
</table>

Given that over half of the schools had a change in status or provided incomplete reports, no statistical conclusions can be drawn from these data. Finally, using information from the League, we discovered that of the 24 schools that offered
baseball and lacked softball in 1995-1996, nine added softball by the 1997-1998 season. Using League data to follow-up, we found twelve schools which were identified as having baseball but not softball in 1989-90, 1995-96 and 1997-98: Bagley (#162), Ashby (#261), Caledonia (#299), International Falls (#361), Balaton (#411), Marshall (#413), Tracy (#417), Adrian (#511), Ada (#521), Medford (#763), Lakeview (#2167), Win-e-Mac (#2609).

Q: Are schools responsive to girls' interest?

A: The data are inconclusive. Seeking to determine whether the failure to offer softball was the result of the girls' lack of interest, we attempted to examine the interest surveys from the schools which offered baseball but not softball. We found that of the 24 schools which offered baseball but lacked softball, only 11 were able to provide evidence to us of having done one or more interest surveys since 1993. Another 10 did interest surveys only after the Attorney General's 1997 request for information; and three schools provided no evidence of having done any interest survey at all. Overall, the interest survey data was collected too close in time to the available participation data to make a determination of school responsiveness. (Once an interest is identified, it can easily take one to two years preparation to set up a new program, i.e. budgeting process, hiring coaches, obtaining equipment, locating practice facilities, etc.)

Q: Does the lack of softball opportunities affect participation in these districts?

A: Yes, we found that girls' participation in Spring sports drops more sharply than boys' when boys have access to baseball and girls do not have access to softball. We examined participation data to determine whether the schools that lacked softball showed a corresponding drop in girls' participation in Spring sports. We sought to determine whether it could be proven statistically that any drop in participation found would be attributable to the lack of a girls' softball team.
While generally participation for both boys and girls drops in the Spring when compared to Fall and Winter numbers, on average, girls' participation in Spring sports dropped much more sharply than boys' when boys had access to baseball and girls did not have access to softball.

| Participation Change Rates at Schools Offering Baseball But Not Softball 1995-96 |
|-----------------------------|-----------------------------|
|                             | Boys | Girls |
| Fall to Spring              | -18% | -49%  |
| Winter to Spring            | -14% | -34%  |

Q: How does quality of the 1995-96 data compare to the quality of the 1989-90 data?

A: In both studies, the data required many hours of cross-checking and correcting. To study this question, we requested a report from the Department's MINCRIS database on districts lacking any of the Big Three for girls for 1995-96, the most recent year for which the most complete data were available. The original report generated a list of 85 schools. Seven of these were charter schools and outside the scope of our study. Of the remaining 78, we were able to identify 24 that in fact offered Big Three sports but were included in the report either because they failed to report or due to data entry errors. Ultimately, we were able to determine that in 1995-96, there were 54 schools involved in interscholastic sports did not offer girls' softball. Of the 54 schools which lacked softball in 1995-96, 24 offered baseball for boys; the other schools offered neither baseball nor softball. The high percentage of errors in these data make them unsuitable for drawing firm conclusions, raising concerns about the quality of the data.
III. Accommodation of Emerging Interests of Girls

Ice Hockey

When compared to girls in the rest of the nation, girls in Minnesota have the most opportunities to play league-sponsored ice hockey. In fact, Minnesota is the only state in the country with league-sponsored girls' ice hockey. However, when compared to boys in Minnesota, girls in Minnesota still lag far behind.

It is only within the past four years that the Minnesota State High School League has sponsored interscholastic hockey for girls. League sanctioned girls' hockey is, in part, an outgrowth of the resolution of complaints filed with the Department of Children, Families and Learning, the Minnesota Department of Human Rights, and the U.S Department of Education Office of Civil Rights. In the past four years, the number of girls' teams participating has steadily risen to a total of 83.

The number of teams does not, however, begin to demonstrate the broad base of opportunity for high school girls today. While building a girls' ice hockey program, many schools have opted to enter into cooperative arrangements with a neighboring school or schools. In the 1997-1998
season, 62 schools were involved in cooperative arrangements, expanding the number of public schools where girls had access to ice hockey through their schools to 115. Counting private school and public school teams and private/public school cooperatives, girls at 129 Minnesota schools had access to league-sponsored ice hockey.

While the growth in the number of girls involved in league-sponsored ice hockey teams is impressive, equity has not yet been achieved. To evaluate equity, we analyzed whether girls and boys have proportional access to hockey, a proportional level of play, and the progress of efforts to accommodate this major sports interest of girls.

Access is not yet proportional. There are 155 boy's teams, compared with 83 teams for girls.

<table>
<thead>
<tr>
<th>Number of League-Sponsored Ice Hockey Teams</th>
</tr>
</thead>
<tbody>
<tr>
<td>1997-98 Season</td>
</tr>
<tr>
<td>Boys'</td>
</tr>
<tr>
<td>155 teams</td>
</tr>
<tr>
<td>Girls'</td>
</tr>
<tr>
<td>83 teams</td>
</tr>
</tbody>
</table>

Cooperative sponsorship arrangements have increased the access to league-sponsored ice hockey for boys as well. Although there are 155 boys' teams in the league, boys at 187 public schools have access to hockey through their schools through the use of cooperative arrangements. When private school teams and cooperatives involving private schools are included in the count, the number of schools offering access to league-sponsored boys' ice hockey teams jumps to 211 (1997-98 season). Of the 211 public and private schools offering league-recognized ice hockey
for boys, 98 were involved in cooperatives. In comparison, only 129 public and private schools offer ice hockey opportunities to girls, 62 of these cooperatively.

### Number of Schools Offering Access to League-Sponsored Ice Hockey

<table>
<thead>
<tr>
<th></th>
<th>GIRLS</th>
<th>BOYS</th>
</tr>
</thead>
<tbody>
<tr>
<td>Public schools offering access</td>
<td>115</td>
<td>187</td>
</tr>
<tr>
<td>Private schools offering access</td>
<td>14</td>
<td>24</td>
</tr>
<tr>
<td><strong>Total schools offering access</strong></td>
<td><strong>129</strong></td>
<td><strong>211</strong></td>
</tr>
<tr>
<td>Schools involved in cooperatives</td>
<td>62</td>
<td>98</td>
</tr>
<tr>
<td>Schools with own team</td>
<td>67</td>
<td>113</td>
</tr>
<tr>
<td><strong>Total schools offering access</strong></td>
<td><strong>129</strong></td>
<td><strong>211</strong></td>
</tr>
</tbody>
</table>

Although forming a cooperative team is an excellent way to begin a program, a cooperative team for girls must not be viewed as achievement of equitable access by schools which have a single-school boys’ program. There is some concern that the cooperative programs may limit the actual opportunities for girls, especially for girls who are not necessarily star athletes. A cooperative team involving multiple schools attracts the strongest players from each school; many would-be players do not have a place on the team under this arrangement because there are fewer total places on fewer teams. Therefore, girls with emerging skills do not have the same access to the sport as boys with equivalent skills in districts that offer single-school opportunities for boys and cooperative teams for girls.

Finally, level of play opportunities for girls’ ice hockey are also not yet on par with boys’. While boys have Class A and AA sections, girls are still in a single, undesignated class. The single girls’ class has 83 teams. Boys’ Class A has 82 teams; boy’s class AA has 73.
It is noteworthy that none of the twelve boys' teams that competed in the championship games of the 1997-98 boys' ice hockey tournament was a cooperative itself. It is also noteworthy that of the 12 schools that participated in the championship games of the 1997-98 boys' tournament, seven have girls' teams (Red Wing, St. Louis Park, Mahtomedi, Anoka, Bloomington Jefferson, Hastings, Edina); two offer girls' hockey through a cooperative (Eveleth-Gilbert, Duluth East) and three do not offer girls' hockey at all (Hermantown, East Grand Forks, Roseau).

Pressure on districts is key. The Department ordered Duluth and Hermantown districts to establish girls' hockey teams as a result of formal complaints of inequitable opportunities. Historically, as many as ten other districts were ordered by the Department to prove girls' hockey or other winter sport to increase equity.

While the recent surge in girls' ice hockey has been impressive, continued pressure needs to be applied to schools to offer and expand opportunities for girls. This is especially true at schools where boys' hockey is firmly entrenched, but girls have no program. Where boys are playing, girls are familiar with the sport and may need only encouragement to play.

A recent experience at a metro area elementary school demonstrates the benefits of encouragement. Various playground opportunities are available to children at the school,
including a field hockey court and equipment. Competition for the hockey equipment is intense; many boys eat quickly in order to lay claim to a stick during the noon recess. Traditionally, no girls have played field hockey at lunch and no girls have complained about availability of equipment. The administration came to the PTA asking for funds for picnic tables, so the girls would have a place to sit and talk. This seemed to be what the girls “wanted to do” at recess. Instead, as an experiment, the PTA purchased a second field hockey set and directed that it be labeled for girls’ use only. Within a week, girls were fielding full teams daily. While establishing a high school team for interscholastic league play is more complex than setting up a recess program, the reasons for pushing forward are the same. Girls will play when given opportunity and encouragement.

IV. Participation Data

Schools are mandated by state law to compile participation data for boys and girls on an annual basis. The reports must be submitted to the Department by October 15 of each year for the preceding school year. The Attorney General obtained compliance reports from the 1995-96 school year, the most recent year for which data were available.

Raw Participation Data: Appendix B

Raw athletic participation data by gender for all of the secondary schools in Minnesota are contained in Appendix B, “Raw Participation Data.” The data are shown in four sets of columns:

(1) Total boys’ and girls’ enrollment for the 1995-96 school year.

(2) Total number of boys’ and girls’ activities (sports).

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Data in this report for each school is presented in numerical order by school district number. A list of schools in alphabetical order by school name is included as Appendix A for easy cross-reference.
"Activities" in this context are limited to "sports". Danceline and cheerleading are not activities within the definition of sports and, therefore, not included in these totals.

(3) Total number of boys' and girls' opportunities (teams).

These columns indicate how many teams the school offered for each gender. For example, when a school offers volleyball, it counts as one activity. If there are five different volleyball teams at the school, then there are five opportunities counted for volleyball.

(4) Total number of boy and girl participants in athletics.

These columns show how many actual spots are filled on each team. This number is sometimes referred to as a "duplicated" count, because a student who participates in two different sports will be counted twice (once for each sport).

Analysis: Is participation proportionate?

Participation data is used to determine whether interscholastic opportunities for male and female students are provided in numbers substantially proportionate to their respective enrollments. This determination can be made from the data contained in Appendices C and D.

Participation Data: Appendix C.

The data contained in Appendix C include the following percentages for girls:

(1) Percentage of the school's students who are female.

(2) Percentage of the school's athletes who are female.

This is sometimes called the "unduplicated participation rate" because a student who participates in two different sports is only counted once.

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4 A "sport" is a competitive physical activity that is offered within a school, the purpose of which is to provide opportunities for students to compete with other students on like teams in other schools within an organized conference under the auspices of the Minnesota State High School League or with other teams operating under separate jurisdictions (Minn. Rules 3535.3000). A sport has a primary purpose of competition, not support.
(3) Percentage of the spots on teams filled by females.

This is sometimes called the “duplicated participation rate” because an individual athletic who participated in multiple sports will be counted once for each sport.

Thus, if a school has the same percentage in all three columns, or if the percentage in the second or third columns is substantially proportionate to the enrollment percentage in the first column, then that school has met a very important component of the gender equity test.

If the percentage in either the second or third column is substantially lower than the first column, it means the girls are underrepresented in the athletic program. (Any blanks in the data mean the school submitted insufficient data to make the calculation.)

While statistics are helpful to establish whether a school has substantially proportionate participation, meeting that one factor does not establish overall equity.

Relative Opportunities for Girls.

Some additional factors to consider in whether a school’s offerings are equitable include: the number of different activities for each gender; the relative opportunities athletes have to play team vs. individual sports and contact vs. non-contact sports; seasonal balance; and the indoor or outdoor nature of the activity. While analysis of all of these factors is outside the scope of this report, analysis of the difference in number of sports and teams for each gender can provide a benchmark for a state-wide measurement of progress. Data from 1989-90 showed that 65 percent of districts offered fewer sports for girls than for boys. By comparison, 1995-96 data shows that 53 percent of schools for which we have data offered fewer sports for girls than they do for boys; 35 percent offered the same number of sports for girls and boys; and 12 percent offer more sports for girls than boys. The difference in number of teams is more skewed towards boys: 63 percent of schools offered fewer teams for girls, 17 percent offered the same number of teams for boys and girls and 20 percent offered more teams for girls than boys.

Note that the 1990-91 report counted districts, the 1995-96 report counted school buildings.
### Difference in Total Number of Sports Offered to Each Gender 1995-1996

<table>
<thead>
<tr>
<th>Difference</th>
<th>Number of Schools</th>
</tr>
</thead>
<tbody>
<tr>
<td>+6</td>
<td>0</td>
</tr>
<tr>
<td>+5</td>
<td>0</td>
</tr>
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<td>+4</td>
<td>0</td>
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<tr>
<td>-5</td>
<td>0</td>
</tr>
<tr>
<td>-6</td>
<td>0</td>
</tr>
</tbody>
</table>

- **Number of schools offering more sports for girls than boys**
- **Number of schools offering equal numbers of sports**
- **Number of schools offering fewer sports for girls than boys**
### Difference in Total Number of Teams By Gender 1995-1996

<table>
<thead>
<tr>
<th>Difference</th>
<th>Count</th>
</tr>
</thead>
<tbody>
<tr>
<td>+15</td>
<td>1</td>
</tr>
<tr>
<td>+8</td>
<td>2</td>
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<td>+7</td>
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<tr>
<td>+5</td>
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</table>

**Number of schools offering more teams for girls than boys**

**Number of schools offering equal numbers of teams**

**Number of schools offering fewer teams for girls than boys**

### Comment: Reporting Concerns

The Attorney General obtained computer reports (MINCRIS system) and photocopies of the raw data submitted by the schools for the 1995-96 school year. Both the computer data and raw data were incomplete. Subsequent investigation established: 1) some schools did not meet the data submission requirements, despite reminders; 2) some schools submitted inaccurate data; and 3) some data submitted by schools was never entered into the mainframe database by the Department. Accuracy of actual data entry had improved greatly from a similar study in 1992.
The data problems that were discovered were apparent because we asked for statewide reports and attempted to cross-reference the data with other information. Too often, the data from these sources simply did not match. This problem is heightened by the limited use of the MINCRIS data. Generally, the athletic information in the MINCRIS database is pulled and studied only for a single school or district at a time, for example, in response to a complaint or as part of a sample. Individual records are then corrected as needed. Under the current practices of the Department, there is a six year monitoring cycle which includes a desk review of athletic data each year for a sample of school districts. This cycle generates eight to ten on-site monitoring visits annually. The visits include examination of gender equity in athletics, as well as other areas. Because the use of the database is so limited, patterns of errors are not routinely found and corrected. The high incidence of errors makes statewide statistics drawn from the data unreliable.

The low usage of the data was cited in the 1992 Attorney General report as a cause for concern. The same seems true today. No state wide reports on athletics are run from the participation data which schools are obligated to submit annually. Examining comprehensive reports is necessary to monitor compliance. On the chart on page 19 (Difference in Total Number of Teams by Gender), for example, we learn that one school reports fielding 15 more teams for girls than boys; another reports fielding 17 fewer teams for girls than boys. Both of these schools merit a closer examination. Under the current practices at the Department, there is only minimal monitoring of a small number of districts or buildings annually. The Department also reviews files when it receives a complaint. Specific recommendations for more monitoring are contained in Section VI.
V. Interest Survey Data

Methodology

In mid-October 1997, the Office of the Attorney General made a request under the Minnesota Government Data Practices Act (Minnesota Statutes Chapter 13) for summary results of any student interest survey of interscholastic athletic activities conducted by the school in the 1993-1994 school year or thereafter. We specifically asked for the compilation of the results of the survey(s) by gender and sport. (A copy of the letter is attached as Appendix D.)

The letter was sent to 460 school buildings, using the current mailing list obtained from the Department. No letters were returned for incorrect addresses. The letters were printed on letterhead from the Office of the Attorney General and addressed to the Title IX Coordinator at each school.

By mid-November 1997, we received responses from approximately one third of the schools on the original list. We reviewed the list, eliminating junior high schools and charter schools. We then telephoned and sent follow-up facsimiles to the remaining non-responsive schools. Responses trickled in. On February 28, 1998, more than four months after our first request was sent, we cut off data collection to analyze the data we had obtained and to finalize the report.

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6 Although the initial data practice request was directed at senior and junior high schools, the follow-up request did not include junior high schools because they are not uniformly involved in interscholastic athletics. Thus, their data has limited usefulness for analysis. For the same reason, no follow-up was done to charter schools.

7 Several schools submitted data too late for inclusion in the tables or computations in this report. These include: Minneapolis, Sibley East (Gaylord), and Jackson County Central, Floodwood, Parkers Prairie, Duluth East, Blackduck, and Atwater-Cosmos-Grove City. Each of these districts/schools did a survey after the Attorney General's request. None of them provided evidence of a prior survey. All of the schools collected information by gender, with the exception of Sibley East.
The data were complied into tables to demonstrate the extent of compliance with the interest survey requirement. The complete tabulated results of the survey are attached as Appendices E and F.

**Interest Survey Data: Appendix E**

Appendix E is a listing entitled “Years in Which Schools Conducted Interest Surveys.” Every interest survey received by the Attorney General was logged on this chart with an “X”.

**Analysis of Interest Survey Data: Appendix F**

Appendix F demonstrates whether the interest surveys were regularly and correctly conducted. The chart has six data columns. The first data column shows schools which were able to provide evidence of having done more than one survey since 1993. This data is important because schools are required to make a biennial determination of student interest. Assuming a survey was done in 1993, additional surveys should have been conducted in 1995 and 1997. Only 39 schools did more than one survey since 1993.

The second and third data columns address the issue of whether schools are conducting the surveys on their own, or whether they needed to be prompted by an outside entity to conduct them. In 1993, the League prompted schools by collecting the surveys; in 1997, the Attorney General prompted schools by a data practices request. The second data column on Appendix F shows schools which provided evidence of conducting one interest survey without being prompted by an outside entity; the third data column shows schools which did a survey only in response to outside prompting.

The fourth and fifth columns address the usefulness of the surveys. Since the primary purpose of the survey is to determine the sports interests of students by gender, it is important that data be collected by gender. These columns indicate which schools submitted results by gender and which submitted pooled results.

The final column shows which schools provided no evidence of having conducted any survey at all. The overall results of the schools’ response to the Attorney General’s Data Practices Request are summarized in the following table.
School Response to Data Practices Request  
for Interest Survey Information  
1997-1998

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<tr>
<th>Number</th>
<th>Description</th>
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<tbody>
<tr>
<td>39</td>
<td>More than one interest survey since 1993 and prior to our October 1997 request</td>
</tr>
<tr>
<td>152</td>
<td>One interest survey since 1993 and prior to our October 1997 request</td>
</tr>
<tr>
<td>95</td>
<td>One interest survey since 1993 and only in response to our October 1997 request</td>
</tr>
<tr>
<td>83</td>
<td>Provided NO evidence of any survey</td>
</tr>
<tr>
<td>66</td>
<td>Junior high schools (eliminated)</td>
</tr>
<tr>
<td>17</td>
<td>Charter schools (eliminated)</td>
</tr>
<tr>
<td>7</td>
<td>Duplicate addresses (eliminated)</td>
</tr>
<tr>
<td>459</td>
<td>Total</td>
</tr>
</tbody>
</table>

Of 459 schools contacted, the following number provided evidence of having done:

Of 286 schools which provided interest surveys in response to the request, 74 schools submitted pooled results so that the separate interests of boys and girls could not be ascertained.

In our telephone follow-up to athletic directors at non-reporting schools, we heard a variety of rationales for not responding to our letter and for not complying with the law requiring surveys. The most often heard remarks were:

- many athletic directors claimed not to have received the letter, chiding us for addressing the letter to the Title IX coordinator;
- many athletic directors claimed to be new in their jobs and without knowledge of the law;
- many athletic directors claimed to be new in their jobs and without knowledge or files on any surveys previously taken;
• some reported not having time to take the survey;
• some reported the survey was too much trouble;
• some reported the survey was too much trouble and useless, since there was not money to implement any additional activities.

Findings: Are Interest Surveys Useful?

Q: Do schools conduct interest surveys as mandated by law?

A: Generally, no. Only about ten percent provided evidence of having conducted more than one interest survey since 1993, despite a requirement that surveys be conducted every two years. Forty-one percent conducted one survey without being prompted. Twenty-six percent conducted surveys only in response to the Attorney General's data request. Twenty-two percent did not provide any evidence of having conducted a survey.

Q: Is the data useful for the purposes for which they are intended: can the separate interests of boys and girls be ascertained from the data collected?

A: In far too many cases, it is impossible to determine emerging interests of students by reading the data received from the schools. Often surveys do not make it clear to students that they may indicate interest in sports not traditionally offered for their gender. In 20 percent of the responses, the data received from the schools was not categorized by gender. In addition, many schools did not use the model (standard) form when surveying their students, so state-wide compilation and comparison of the data is not feasible. One school conducted a survey in response to our request and immediately sent the entire set of student responses to us without any local tallying.
Q: In those instances where good data was obtained from a good data instrument, were schools responsive to the surveyed interests of girls?

A: We had hoped to compare interest data with participation data to determine school responsiveness to girls. To accomplish this analysis, we needed interest surveys that were at least two years older than the participation data. In most cases, however, the interest survey data received were more recent than the participation data we have available to us, so the planned analysis was not possible.

Q: In those instances where good data was obtained from a good data instrument, was it possible to determine any emerging interest areas of girls?

A: Girls and boys surveyed generally report interest in soccer.


A: The League data, which used a standard survey instrument, are no longer maintained in a computerized format. The recent data was not submitted in a standardized format. Therefore, comparison of the results of the two collection efforts was not feasible within the constraints of this study.

VI. Conclusions and Recommendations

Overall, the Attorney General found that many schools have made commendable progress towards gender equity in athletics. Where opportunities exist, girls are participating in athletics and their participation is growing. However, the participation of girls and boys is not yet substantially proportionate in all schools. We found two areas at the state level which give rise to concern. First, participation data collected by the Department are incomplete, incorrect and under-utilized. The under-utilization -- lack of monitoring -- is especially problematic, because
schools need to be pushed to comply with the law. Second, most schools are not regularly surveying the sports interests of their students. In fact, many athletic directors seem to view interest surveys as a burden rather than a valuable tool to identify interests.

The Department and State High School League’s ad hoc committee produced a helpful guidebook, but we fear that it has been left on the shelf. Gender equity is the law; while progress has been made in the past twenty-five years, it has been slow. The low level of compliance with the interest survey requirement in most schools is cause for concern. The ad hoc committee detailed ten steps in its guide. Conducting an interest survey is only the first step to achieving gender equity. Our study has shown that most districts are not even completing the first step. We can only speculate whether they are following through with the other steps. Schools whose athletic participation numbers are not substantially proportionate have an affirmative obligation to accommodate the interests of their students. Inquiring about the sports interests of their girls and boys is only a small part of that obligation.

As some schools need state-level encouragement to take the necessary steps, we make the following recommendations:

- On-going education of athletic directors and superintendents is necessary. “I’m new” is not an acceptable answer to an inquiry about the status of equity. Every athletic director and superintendent in the state should be familiar with the mandates of state and federal law as it relates to athletics. The ad hoc committee’s “Guide to Gender Equity” should be required reading for every new athletic director; but even existing athletic directors and superintendents need regular encouragement to lead their schools to compliance with gender equity laws. On-going education of athletic directors may be possible through the League’s established newsletters.

- Effective monitoring of gender equity in schools requires data collection, processing, and analysis. Collection of participation data is already required by law. Massive
amounts of athletic data are maintained on the system, but reports are rarely run and there is no analysis of the data. The Department needs the resources to collect, process and analyze the data.

- The Department should follow-up with non-compliant schools. Currently, however, there is no system in place to identify the schools that are not making adequate progress. The Department's collective staffing allocation of .80 FTE (spread over three people) (cost = $50,523) allows it only to respond to questions and complaints, and conduct a minimal level of monitoring and corrective action. Staff is needed to:

  1. Collect participation data and ensure that it is entered into the database.
  2. Compute participation and expense ratios for all schools/districts.
  3. Annually identify the least compliant schools and conduct compliance audits.
  4. Publicize the results of the audits to educate other schools.

- The Department should standardize, collect, and regularly analyze interest survey data in conjunction with participation data. Interest surveys are an important tool for schools to use to track the sports interests of their students and are especially crucial at the schools where the participation rates are disproportionate.

If gender equity is to be achieved in Minnesota schools, monitoring is needed. The Attorney General's study found that monitoring of equity in athletics has slipped through the cracks.

Finally, in its response to this report, the Department stressed the need for legislation that explicitly requires district compliance with substantive gender equity laws and gives the Department authority to monitor and order corrective action. The Department pointed out that it has met with limited cooperation from local districts in its monitoring activities, and that, without explicit legislative authority, it would have difficulty overcoming this resistance. The
Department agreed that data collection needs to be improved to insure greater accuracy in reporting, acknowledging that, with improved data collection, the Department can follow through with more meaningful analyses and guidance for school districts. The Department points out, however, legislation is need to clarify district reporting responsibilities and the Department’s authority to insure compliance.
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** Non-compliance with DCFL reporting rule
** New school
+ No sports
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### Alphabetical Listing of Schools

#### Appendix A

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**KEY**
* Non-compliance with DCFL reporting rule
** New school
+ No sports
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## Participation Data Proportionality Analysis 1995-1996

### Appendix C

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**KEY**

- *: Non-compliance with DCFL reporting rule
- **: New school
- +: No sports
- Blank: Data missing

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## Participation Data Proportionality Analysis 1995-1996

### Appendix C

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Re: Data Practices Request Regarding Student Athletic Interest Surveys

Dear Title IX Coordinator:

State and federal laws require schools to conduct a survey of student interest in interscholastic activities every two years. In 1993, the Minnesota State High School League distributed a manual to Minnesota high schools which included a sample "Student Interest Survey of Interscholastic Athletic Activities." (Sample enclosed.) The Office of the Attorney General, at the request of the Legislature, is conducting a study of gender equity in athletics in Minnesota. In furtherance of the study, we are making the following request for public information under the Minnesota Government Data Practices Act, Minnesota Statutes Chapter 13:

1. A sample copy of survey forms used by your school to conduct its most recent "Student Interest Survey of Interscholastic Athletic Activities." If you used the enclosed form, please indicate that.

2. A summary of the results of any student interest survey of interscholastic athletic activities conducted by your school in the 1993-1994 school year or thereafter. Specifically, we are seeking the compilation, by gender and sport, of the results of your survey or surveys. Please note, no private data on individual students is requested.

3. The name, title, address, and telephone number of your school’s contact for information in this area.

Please send the requested data to: Nancy Joyer, Office of the Attorney General, 1200 NCL Tower, 445 Minnesota Street, St. Paul, MN 55101-2130. In the alternative, data may faxed to me at (612) 296-7438. The data is needed by October 24, 1997 so that it may be included in the report.

If you have any questions about this request, please contact me at (612) 297-4611.

Sincerely,

NANCY J. JOYER
Assistant Attorney General
Education Division

Facsimile: (612) 296-7438 • TTY: (612) 296-1410 • Toll Free Lines: (800) 657-3787 (Voice), (800) 366-4812 (TTY)
An Equal Opportunity Employer Who Values Diversity • Printed on 50% recycled paper (15% post consumer content)
1992-93
Student Interest Survey of
Interscholastic Athletic Activities

Name: __________________________ Male: ______ Female: ______
School: _____________________ Current Grade: ____ Date: ______

STUDENTS: This survey is being conducted by Minnesota schools. We are seeking information about your participation in athletics and your interest in athletics not currently sponsored by the school district. The district is evaluating its athletic program because of its commitment to providing equal opportunity for girls and boys under the regulation of Title IX and Minnesota Statute 126.21.

SECTION A: Place an X in the appropriate columns:

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<td>Track and Field - b &amp; g</td>
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g = girls sport, b = boys sport (Note: girls may participate on boys teams)
### SECTION B: Other sports offered:

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<th>I have or will try out in 1992-93</th>
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### SECTION C: Indicate any other sports in which you have an interest such as, but not limited to:

- Archery
- Fencing
- Indoor Soccer
- Table Tennis
- Badminton
- Field Hockey
- Judo
- Team Handball
- Bowling
- Figure Skating
- Karate
- Waterpolo
- Curling
- Ice Ringette
- Weightlifting
- Other Sports: I would try out for a team, if offered:

### SECTION D: Indicate other athletic activities in which you have an interest, such as cheerleading, danceline, pompons, etc.

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<th>Our School Offers</th>
<th>Other Athletic Activities</th>
<th>(1) I have or will try out in 1992-93</th>
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<th>(3) I would try out, if offered</th>
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### SECTION E: Please answer the following questions.

1. Please list any sport(s) which you would try out for if it were offered for your gender; i.e., boys volleyball, girls ice hockey, etc.

2. Is there a sport you would try out for if it were conducted in a different season by your school? Yes ___ No ___
   If yes, please name the sport(s) and preferred season(s):

3. Please name any sports in which you compete outside of school, such as community-sponsored teams, recreational leagues or club teams:

4. Do you play on an interscholastic adapted sports team, such as floor hockey? Yes ___ No ___
   If yes, what sport(s):

5. If you are not participating in school athletics, please state your reasons:
   - not interested
   - not "good" enough to make the team
   - too busy with other school activities
   - none of my friends are involved
   - working
   - my activity is not offered by my school
   - other:
### Years in Which Schools Conducted Interest Surveys
#### Appendix E

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<tr>
<th>District Number</th>
<th>School Name</th>
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**KEY**

* Non-compliance with DCFL reporting rule
** New school
+ No sports
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### Years in Which Schools Conducted Interest Surveys
#### Appendix E

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Years in Which Schools Conducted Interest Surveys
Appendix E
### Analysis of Interest Surveys

**Appendix F**

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**KEY**

- *: Non-compliance with DCFL reporting rule
- **: New school
- +: No sports
- Blank: Data missing
## Analysis of Interest Surveys

**Appendix F**

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### Analysis of Interest Surveys

**Appendix F**

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## Analysis of Interest Surveys

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### Analysis of Interest Surveys

**Appendix F**

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### Analysis of Interest Surveys

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