UNITED STATES DEPARTMENT OF EDUCATION

OFFICE OF THE CHIEF INFORMATION OFFICER

MAY 19 2003

Michael W. Moyer
Executive Director
National Wrestling Coaches Association
1976 Auction Road
Manheim, PA 17545

Eric Pearson
College Sports Council
1825 I Street, NW Suite 400
Washington, DC 20006

Dear Mr. Moyer and Mr. Pearson:

This letter is in response to your February 26, 2003 Information Quality Request (Feb. 26 letter) regarding "Open to All: Title IX at Thirty: Report of the Secretary's Commission on Opportunity in Athletics." We have carefully reviewed your correction request and the reasons for the correction. For the reasons stated below, we have determined that no correction is warranted.

In your request, you indicate that the Commission's Report does not comply with the Department's Information Quality (IQ) Guidelines because it (1) fails to document the shortcomings and limitations of data cited in the report, (2) fails to use representative or complete survey populations, and (3) fails to identify conflicting information and to caution against inappropriate conclusions. In particular, you indicate that the Commission's Report "relies" on General Accounting Office (GAO) reports from December 2000 and March 2001, that do not account for schools that have joined the NCAA or NAIA since 1981, or schools that may have joined the NCAA or NAIA after the Association for Intercollegiate Athletics for Women (AIAW) disbanded in 1983. Taken together, you indicate that these inaccuracies overstate the gains in women's sports opportunities since 1981 and understate the losses in men's sports opportunities over the same period. You ask that the Department either conduct or commission a demographic analysis of changes in men's and women's sports opportunities, or at least qualify the Commission report to note the shortcoming of this data, either through a revised publication or errata sheets.

The IQ Guidelines require that for third-party data, the Department "identify the source of the information and any shortcoming or limitations of the data if we rely upon it for decision-making purposes." (emphasis added) Guidelines at 6. In this case, the GAO reports are only two of the many sources of information that was collected by the Commission as it developed recommendations for the Secretary. The Commission's Report uses the data from the GAO reports essentially as background information on the changes in athletic participation by men and women since Title IX was enacted. The substance and cumulative weight of the citations to the GAO data in the Commission's Report is, at most, a general statement in support of Title IX and its gains for women's sports, which is something you do not contest in your February 26, 2003 letter. ("We dispute the foregoing data not to deny the great gains

in women's sports, but to stress that women made these gains before the Three Part Test was issued in December 1979." Feb. 26 letter at 3.)

The Commission's Report also examines and presents other data that place the data from the GAO reports in a broader context. For example, in the "Findings" section, the Commission's Report cites numbers on participation provided by Jerome Kravitz, a consultant and professor at Howard University, as well as testimony from Corey Bray of the NCAA, who commented on overall participation of men and women in NCAA championship sports. As explained on page 24 of the Report, "[t]he Commission found that it is extremely difficult to obtain a set of data that is accepted by all parties." Thus the Commission's Report, taken in its totality, presents data from several perspectives on the opportunities for men and women to participate in sports both before and after Title IX was enacted. The data in the GAO reports were only some of the information that was collected and reported, and do not, in and of themselves, form the basis for the recommendations of the Commission.

In sum, no correction to the Commission Report is warranted because the Commission did not rely on the GAO report data in making its recommendations to the Department.

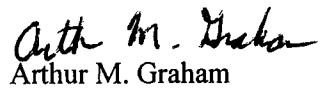
Procedures for Appeal

If you are not satisfied with this decision, you may appeal to the Department's Chief Information Officer within thirty (30) calendar days of receipt of the Department's decision. This administrative appeal must include a copy of the initial request, a copy of the Department's decision, and a letter explaining why you believe the Department's decision was inadequate, incomplete or in error.

This appeal information should be provided to the Department's Chief Information Officer (OCIO) at the following address:

The Chief Information Officer
U.S. Department of Education
Re: Information Quality Appeal
Room 4082, ROB-3
400 Maryland Avenue, SW
Washington, DC 20202

Sincerely,



Arthur M. Graham
Director, Information Management