



**UNITED STATES DEPARTMENT OF EDUCATION**

**FY 2003 REPORT ON  
INFORMATION QUALITY REQUESTS  
AND RELATED ACTIVITIES**

**Office of the Chief Information Officer  
7<sup>th</sup> and D Streets, S.W.  
Room 4082, ROB-3  
Washington, D.C. 20202-4651**

**December 18, 2003**

# Information Quality Report for FY 2003

## I. Requests for Correction Received during FY 2003

**Department Name:** U.S. Department of Education

**Period Covered:** October 1, 2002 – September 30, 2003

Agency Name	Number of Requests Received	Number Designated as Influential
Office for Civil Rights	1	0
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<b>Total:</b>	<b>1</b>	<b>0</b>

## II. Summary of Individual Requests Received

- **Agency Receiving Correction Request:** U.S. Department of Education  
Office for Civil Rights
- **Requestor:** Michael Moyer, National Wrestling Coaches Association (NWCA) and  
Jamie V. Moffat, College Sports Council (CSC)  
Collegiate sports interest group
- **Date Received:** Request letter was dated February 26, 2003. It was received by regular  
mail, and acknowledged on March 14, 2003
- **Summary of Request:** The requesters allege that the Report of the Secretary's Commission  
on Title IX, *Title IX at Thirty*, does not comply with the Department's Information Quality  
(IQ) Guidelines because it (1) fails to document the shortcomings and limitations of the data  
cited in the report (i.e., shortcomings they allege are contained in General Accounting Office  
Reports (GAO) from December 2000 and March 2001), (2) fails to use representative or  
complete survey populations, and (3) fails to identify conflicting information and to caution  
against inappropriate conclusions.
- **Description of Requested Correction:** NCWA and CSC request 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 shortcomings of  
this data, either through a revised publication or errata sheets."
- **Influential:** \_\_\_ Yes    X No    \_\_\_ Undetermined
- **First Agency Response:** \_\_\_ in progress    X completed  
The Department responded on May 19, 2003
- **Resolution:** No correction was made. In its Decision, the Department explained that 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. . . The Commission's Report also examines and presents other data that  
place the data from the GAO reports in a broader context. . . [so that the] GAO reports were  
only some of the information that was collected and reported, and do not, in and of  
themselves, for the basis for the recommendations of the Commission."
- **Appeal Request:** \_\_\_ none    \_\_\_ in progress    X completed    Appeal letter  
was received on June 18, 2003. It was received by regular mail, and acknowledged on

July 16, 2003. The Department's responded to the requesters on September 15, 2003.

- **Summary of Request for Reconsideration:** The NWCA and CSC stressed that “our Data Quality Act challenge does not address the GAO report *per se* or even the Commission’s inclusion of that flawed GAO data in the Commission report ...[rather] we challenge the Department’s dissemination of a third-party report that contains false and misleading information . . . These data overstate the gains in women’s athletic opportunities and understate the losses in men’s opportunities during key periods relevant to Title IX.”
- **Type of Appeal Process Used:** Panel of three subject matter experts and an attorney conducted an independent review and made recommendations to the Chief Information Officer (CIO). The official who issued the Department’s decision did not participate in the appeal process.
- **Appeal Resolution:** No correction was made. The CIO determined that “[t]he Department has not relied on the allegedly flawed GAO report for decision-making purposes. While the Department has considered conclusions and recommendations in the Commission’s Report, those conclusions and recommendations are not based on the details of the GAO data . . . [and e]ven if the Commission had relied to some limited degree on the GAO data in formulating its conclusions and recommendations, the Commission’s Report comports with the requirements of the Department’s *Information Quality Guidelines* because the Report itself adequately discloses the ‘source of the information and any shortcomings and limitations of the data’ . . . . The Report plainly reflects that there are substantial disputes regarding the quality of the data relating to increases and decreases in athletic opportunities and sets out the reasons for any shortcomings and limitations in the data. . . .” Accordingly, the CIO determined that “the Commission Report comports with the purposes, principles, and standards of the Department’s *Information Quality Guidelines*.”