UNITED STATES DEPARTMENT OF EDUCATION

FY 2003 REPORT ON
INFORMATION QUALITY REQUESTS
AND RELATED ACTIVITIES

Office of the Chief Information Officer
7th 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

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<tr>
<th>Agency Name</th>
<th>Number of Requests Received</th>
<th>Number Designated as Influential</th>
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<tr>
<td>Office for Civil Rights</td>
<td>1</td>
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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

- First Agency Response: in progress
  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

  Appeal letter was received on June 18, 2003. It was received by regular mail, and acknowledged on

- **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*.”