

UNITED STATES DEPARTMENT OF EDUCATION OFFICE FOR CIVIL RIGHTS

500 WEST MADISON ST., SUITE 1475 CHICAGO, IL 60661-4544 REGION V ILLINOIS INDIANA IOWA MINNESOTA NORTH DAKOTA WISCONSIN

July 9, 2015

Mr. Jesse H. Ruiz Interim Chief Executive Officer Chicago Public Schools District #299 42 West Madison St. Chicago, IL 60602

Re: Chicago Public Schools District #299

OCR Case #05-11-1034

Dear Mr. Ruiz:

This letter is to notify you of the disposition of the above-referenced complaint, which the National Women's Law Center filed with the U.S. Department of Education (the Department), Office for Civil Rights (OCR) on November 10, 2010. The complaint alleged that the Chicago Public Schools District #299 (District) discriminates against female students on the basis of sex. Specifically, the complaint alleged that the District subjects high school girls to discrimination on the basis of sex because the selection of interscholastic sports at the District's high schools does not effectively accommodate the interests and abilities of members of both sexes to the extent necessary to provide equal athletic opportunity.

OCR is responsible for enforcing Title IX of the Education Amendments of 1972 (Title IX), 20 U.S.C. § 1681 *et seq.*, and its implementing regulation, 34 C.F.R. Part 106, which prohibit discrimination on the basis of sex in any education program or activity operated by a recipient of Federal financial assistance. As a recipient of Federal financial assistance from the Department, the District is subject to Title IX.

During the complaint investigation, OCR reviewed information provided by the Complainant and the District. Prior to the conclusion of OCR's investigation, the District requested to resolve the complaint. Subsequent discussions with District officials resulted in the District signing the enclosed Resolution Agreement (Agreement) on July 1, 2015. Under the terms of the Agreement, the District will provide, on a school by school basis, an equal opportunity for male and female high school students to participate in interscholastic athletics. The Agreement, when fully and effectively implemented, will resolve the complaint.

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

Background

OCR's investigation revealed that the number and types of sports offered by the District vary from high school to high school and the levels of sports (e.g., varsity, junior varsity, sophomore, freshman) vary as well. High schools offering an interscholastic athletics program choose the specific sports and levels of sports offered from among those sports that have been sanctioned for competition by the Chicago Public High Schools Athletic Association (commonly known as the Public League) and (with the exception of 16 inch softball) the Illinois High School Association (IHSA). The Public League is the governing body that oversees, promotes and regulates interscholastic athletics in the District, and it offers a Chicago Public High Schools Championship at the end of each sport's season. The IHSA is the governing body that oversees, promotes and regulates interscholastic athletics in the state of Illinois, and it offers a State Championship tournament at the end of each sport's season.

During the 2013-14 school year, District high schools offered all or some of the following 14 high school sports for boys: baseball, basketball, bowling, cross country, golf, lacrosse, soccer, softball (16 inch), swimming, tennis, track and field (indoor and outdoor), volleyball, and water polo. During the same period, District high schools offered all or some of the following 13 high school sports for girls: basketball, bowling, cross country, golf, lacrosse, soccer, softball (fast pitch), swimming, tennis, track and field (indoor and outdoor), volleyball, and water polo. In addition, the schools offered two sports sanctioned by the Public League as co-ed sports: football and wrestling. OCR confirmed that 18 girls participated in football and 51 girls participated in wrestling.

The District's Department of Sports Administration & Facilities Management oversees the administration of interscholastic high school sports in the District. During the course of OCR's investigation, the District appointed a new Title IX Sports Compliance Coordinator, who is responsible for communicating, collaborating and consulting with OCR about the District's implementation of the Agreement.

Legal Standard

The provision of equal opportunities with respect to participation in interscholastic athletics is addressed in the Title IX implementing regulation at 34 C.F.R. § 106.41(c)(1). The implementing regulation states that in determining whether equal opportunities are provided for boys and girls, OCR considers whether the selection of sports equally effectively

¹The sports sanctioned by the Public League are the same as the sports sanctioned by IHSA, with the exception of boys' and girls' gymnastics and girls' badminton, which are sanctioned by ISHA but not the Public League, and 16 inch softball, which is sanctioned by the Public League but not IHSA.

accommodates the interests and abilities of members of both sexes to the extent necessary to provide equal opportunity.²

In making this assessment, OCR applies the following three-part test (Three-Part Test):

- 1. the athletic participation opportunities for male and female students are provided in numbers substantially proportionate to their respective enrollments; or
- 2. there is a history and continuing practice of program expansion, which is demonstrably responsive to the developing interests and abilities of the underrepresented sex; or
- 3. the interests and abilities of the underrepresented sex are fully and effectively accommodated by the present program.

If an institution meets any one part of the Three-Part Test, then OCR will determine that the institution provides each sex with nondiscriminatory opportunities to participate. Each part of the Three-Part Test is an equally sufficient and separate method of complying with the Title IX regulatory requirement to provide nondiscriminatory athletic participation opportunities. If an institution's athletic program proportionately affords each sex with the level of competition reflective of their respective abilities, then OCR will determine that the institution is fully and effectively accommodating athletic interests and abilities.

Part One: Substantially Proportionate Participation Opportunities

Under Part One of the Three-Part Test, where an institution provides interscholastic level participation opportunities for male and female students in numbers substantially proportionate to their respective enrollments, OCR will find that the institution is providing nondiscriminatory participation opportunities for individuals of both sexes. OCR will also consider opportunities to be substantially proportionate when the number of opportunities that would be required to achieve proportionality would not be sufficient to sustain a viable team; i.e., a team for which there is a sufficient number of interested and able students and enough available competition to sustain an interscholastic team. As a frame of reference in assessing this situation, OCR may consider the average size of teams offered for the underrepresented sex, a number that might vary by institution.

OCR examined information the District provided pertaining to the enrollment and athletic participation of boys and girls at each of the District's high schools. In the 2013-14 school

²In addition to the Title IX regulations, the following clarifying OCR policy and guidance documents are also applicable: the OCR Intercollegiate Athletics Policy Interpretation, issued December 11, 1979; 44 *Fed. Reg.* 71,413 (1979), available at http://www2.ed.gov/about/offices/list/ocr/docs/t9interp.html; and a Dear Colleague Letter, issued by OCR on April 20, 2010, Intercollegiate Athletics Policy Clarification: The Three-Part Test – Part Three, available at http://www2.ed.gov/about/offices/list/ocr/letters/colleague-20100420.html.

year, the District had 98 high schools with an enrollment of 85,347 students.³ Of this number, 41,926 or 49.12% are boys and 43,421 or 50.88% are girls. The District reported to OCR a total high school interscholastic athletic participation of 31,799 students at these schools. Of this number, 18,664 or 58.69% are boys and 13,135 or 41.31% are girls.⁴ For the 2013-14 school year, the District reported that there were no interscholastic athletics programs at six of the 98 high schools.⁵ OCR's investigation revealed that some students from the six high schools may participate in another school's interscholastic athletics program (i.e., students at DeVry Academy may participate in sports at Alcott High School). As for the remaining 92 high schools, data submitted by the District indicated that girls were underrepresented in more than 90% (84 of 92) high schools, but not underrepresented at the remaining eight high schools in the 2013-14 school year.⁶

Of the remaining 84 high schools, the information indicated girls were underrepresented in the schools' interscholastic athletic programs. At these schools, the disparity in rates between the enrollment of girls and their interscholastic athletic participation rates represented as few as one additional participation opportunity needed for female athletes at one school (Dyett High School) to as many as 477 additional participation opportunities needed for female athletes at another school (Lane Technical High School).⁷

Part Two: History and Continuing Practice of Program Expansion

Under Part Two of the Three-Part Test, an institution may demonstrate compliance by showing that it has a history and continuing practice of program expansion that is demonstrably responsive to the developing interests and abilities of the underrepresented sex. Part Two examines an institution's past and continuing remedial efforts to provide

³These figures do not include charter schools. OCR reminds the District that the Federal civil rights laws, regulations, and guidance, including Title IX, that apply to charter schools are the same as those that apply to other public schools. See, OCR's Dear Colleague Letter dated May 14, 2014, concerning the applicability of Federal civil rights laws to charter schools, found online at http://www2.ed.gov/about/offices/list/ocr/letters/colleague-201405-charter.pdf.

⁴By letter dated May 8, 2015, the District asked OCR to consider its co-ed competitive cheer and dance teams to be part of the District's interscholastic athletic program and to count the participants as athletic participants for the purposes of assessing Title IX compliance. For purposes of this letter, participants in cheer and dance have not been included in OCR's analysis of the District's compliance with Title IX. OCR will consider the information provided by the District during the monitoring of the Agreement, in light of OCR's guidance. *See* OCR's Dear Colleague Letter dated September 17, 2008, "Activities Counted for Title IX Compliance," at http://www2.ed.gov/about/offices/list/ocr/letters/colleague-20080917.html
⁵The six schools were Chicago Excel Academy, Chicago High School for the Arts, Chicago Technology Academy, Community Services West, DeVry University Advantage Academy, and Prologue Early College. ⁶The eight schools were Air Force Academy, Disney II Magnet, Gage Park, George Washington Carver Military Academy, Hyman Rickover Naval Academy, Infinity Math Science and Technology, North-Grand, and Richard Crane Medical Preparatory.

⁷The enrollment and interscholastic athletic participation rate disparities are set forth in the attached Appendix, which identifies the 84 high schools.

nondiscriminatory participation opportunities for members of the underrepresented sex through program expansion.

The District did not provide documentation of its record for individual high schools of increasing the numbers of participants in interscholastic athletics who are members of the underrepresented sex and/or reliable information about the range of sports and competitive levels offered.

In June 2013, the District administered a survey to individual high school athletic directors that asked for information about requests for the addition or elevation as well as the elimination of sports or teams for girls. OCR's review of the results of the survey revealed that some athletic directors reported that there have been requests during their tenures, but most of the directors did not provide additional information about the District's response to such requests. Athletic Directors identified requests for new girls' sports or additional levels for existing sports at their schools for lacrosse, badminton, track and field, swimming, softball, rugby, soccer, gymnastics, bowling, tennis, golf, and water polo. Some respondents also acknowledged that some girls' teams were eliminated, including swimming, soccer, softball, bowling, golf and water polo, tennis, track and field, and basketball.

Part Three: Effective Accommodation of Interest and Abilities

In determining compliance with Part Three of the Three-Part Test, OCR determines whether, despite being unable to demonstrate substantial proportionality or a history and continuing practice of program expansion, an institution is nevertheless fully and effectively accommodating the interests and abilities of the underrepresented sex.

Prior to the commencement of OCR's investigation, the District did not publish notice of how students, parents or other members of the community could request the addition of sports or the elevation of sports to the interscholastic level. The District informed OCR that its Department of Sports Administration & Facilities Management did not receive any requests during the 2013-14 school year for the addition or elevation of a sport or team to interscholastic status either District-wide or at individual high schools. However, the District also indicated that it had not asked for information at individual high schools about whether requests had been received in the 2013-14 or in preceding school years. OCR noted earlier that, in response to the District's June 2013 survey of athletic directors, some high school athletic directors acknowledged that there had been requests for the addition or elevation of a sport or team and/or the elimination of some teams for girls.

In the 2013-14 school year, the District made available an on-line survey for all of its freshmen, sophomore and junior year boys and girls to assess their athletic interests and abilities. OCR approved the content of the survey. The survey distribution methodology, which OCR did not preapprove, resulted in low participation by female students. Results

were provided to OCR and indicate that no responses were received from any girls at over 15 of the District's 98 high schools. The District did not identify to OCR a response rate for this survey by individual high school, however, OCR estimates that the response rate of the surveyed girls was less than 10% at more than 90% of the individual high schools from which responses were received and, of those schools, more than 50% had a response rate of less than 5%. OCR informed the District during the investigation that the rates of response by girls to this survey did not indicate that the survey maximized the possibility of obtaining accurate information and facilitating responses from the District's high school girls.

Further, the District indicated that it has not conducted any analysis of whether individual high schools offer club or intramural sports, and, if so, the number of girls who have participated in such athletic activities. OCR observed from the District's June 2013 surveys conducted by the District of high school athletic directors that only a few athletic directors reported club or intramural athletic activity at their schools with generally small numbers of girls participating in such activity. Sports identified included ice hockey (3 schools), lacrosse (2 schools), and field hockey, archery, and badminton (1 school for each). A few athletic directors reported that girls participated in intramural basketball at their schools.

In this case, the information obtained to date indicates that there would be sufficient ability and available competition to support the expansion of existing girls' interscholastic sports in the District's or addition of new Public League girls' sports.

The Resolution Agreement

As noted above, prior to the completion of OCR's investigation, the District requested to resolve the case with an agreement. As such, OCR is not making a determination as to whether the District has complied with any part of the Three-Part Test with respect to any of the 98 high schools at issue, including the six schools that do not offer interscholastic athletics programs and the eight schools for which the District reported no underrepresentation of girls in the schools' interscholastic athletics programs.

On July 1, 2015, the District agreed to resolve the complaint by entering into the enclosed Agreement. The Agreement is aligned with the allegation in case #05-11-1034 and the information obtained during the investigation, and is consistent with applicable regulations. When fully and effectively implemented, the Agreement will resolve the complaint.

Under the terms of the Agreement, the District will provide an equal opportunity for male and female students to participate in athletics at each of its high schools. Except as noted

⁸ The District's full and effective implementation of the commitments in present Agreement will resolve the monitoring of a previous resolution agreement with the District (case #05-89-1020).

in the Agreement and as appropriate, the District has not chosen a specific part of the Three-Part Test that it will use to show Title IX compliance and may demonstrate compliance with any part of the Three-Part Test at each high school. The Agreement states that, by August 1, 2015, the District expects to demonstrate compliance with Part One of the Three-Part Test at twelve or more high schools.

For other schools where Part One compliance is not established, by September 30, 2015, the District will conduct a comprehensive assessment of the athletic interests of students at each high school to determine whether female students have unmet athletics interests and abilities. The assessment will include results from District surveys of athletic interests and abilities conducted since the 2013-14 school year, and to be conducted annually, following pre-approval by OCR of the survey and its implementation. The survey will include current freshmen, sophomores and juniors, as well as incoming freshmen. The assessment will be based on multiple indicators of interests and, if applicable, multiple indicators of abilities. The assessment will include students who are enrolled in other District high schools that do not have athletics programs but who are eligible to participate in athletics at the school.

Based on the assessment, the District will offer additional athletic opportunities to girls by creating new sports teams, adding levels to existing teams, or increasing the squad size of existing teams.

Where the District already offers a sport at a high school, it will add additional levels of competition or squads at a minimum of twelve high schools for the 2015-2016 competitive season, and new levels or squads of currently existing sports will continue to be added at all high schools annually until such time as the high school has demonstrated to OCR compliance the Three-Part Test, but by no later than the 2018-2019 competitive season.

Where the District does not offer a sport at a high school, then it will determine whether there is a sufficient number of high school female students with sufficient interest and, if applicable, ability to support the addition of a team or multiple teams (varsity, junior varsity, sophomore, etc.), in sports not currently offered by the particular District high school as interscholastic sports, and whether there is sufficient competition within Public League and within that high school's normal competitive region and geographic area to support the addition of those teams/sports. For any sport for which the District determines that there is not sufficient competition within that high school's normal competitive region, the District will take reasonable ongoing steps to develop students' interest and ability in that sport at schools throughout the District. These steps may include establishing club sports, exploring the feasibility of establishing competition in the District's normal competitive region and geographic area, and elevating such sports to interscholastic status when competition becomes available. New sports will be added at high schools beginning with the 2015-16 competitive season, and continuing annually

each season until such time as the high school has demonstrated to OCR compliance with one the Three-Part Test, but by no later than the 2018-19 competitive season.

The Agreement also memorializes several steps already taken by the District to increase the information available to students, parents and members of the public about its sports offerings and to coordinate its interscholastic athletics programs; these steps are required to continue throughout OCR's monitoring of the implementation of the Agreement. These steps included the creation of a new District web page that includes information about athletics opportunities throughout the District and identifies the five regional athletic directors responsible for the oversight of specific District sports. The web page includes a specific notice of non-discrimination on the basis of sex in athletics, and states that a student, coach, parent, "or other interested party" may inquire about the possibility of adding a new sport, or adding a new level to an existing sport at a District high school. In addition, as noted above, the District has appointed a Title IX Sports Compliance Coordinator, ¹⁰ who in addition to communicating with OCR about the District's implementation of the Agreement, is responsible for ensuring that all high schools procure and maintain current, complete and accurate athletics information. The web page states that inquiries about Title IX and sports should be directed to its new Coordinator and offers her phone number and email address, as well as the address of the Department of Sports Administration & Facilities.

Per the Agreement, the District has also created a new database to document the "real-time" participation of students in the District's interscholastic athletics program; this new database will allow OCR to verify the District's reported participation data throughout the monitoring. The Agreement requires the Athletic Directors of each high school to provide current and complete information about the interscholastic athletics program at their schools and to certify the accuracy of the data provided. As part of its efforts to ensure accountability by individual high schools in the implementation of the Agreement, the Agreement requires the District to annually notify the Athletic Director and Principal at each District high school that failure to comply with the terms of this Agreement and/or any staff member's failure to cooperate with the Title IX Sports Compliance Coordinator could result in discipline consistent with the District's employee discipline policies and procedures.

The Agreement also requires the District to develop, implement and publicize a procedure for students or other interested parties, such as coaches or parents, to use in requesting the addition of new sports or levels of sports at the District's high schools, and to provide annual notice to students, coaches, and other District staff of all of the sports offered at each high school. As noted, the website includes notice of this procedure and the available sports at each high school. The District also provided documentation to

⁹http://www.cps.edu/PROGRAMS/BEFORE_AND_AFTER_SCHOOL/ATHLETICSSPORTS/Pages/Athle ticsSports.aspx#

OCR showing that at the start of the 2014-15 school year, it notified high school athletic directors, coaches, physical education teachers, principals, counselors and high school students that inquiries concerning the possibility of adding a new sport or a level of competition at an individual high school may be made by contacting the Title IX Sports Compliance Coordinator.

The District requires provision of annual Title IX training for high school athletic directors. The District provided documentation that, at the start of the 2014-15 school year, the District conducted a training session on Title IX for its high school athletic directors. The training session included directions for appropriately documenting and certifying the accuracy of athletic participation counts and notice that individual schools may not eliminate any sport from its program without approval of the District's Title IX Sports Compliance Coordinator and its Office of Sports Administration.

Finally, the Agreement states that the District understands that OCR does not require or encourage the elimination of any District athletic teams and that it seeks action from the District that does not involve the elimination of athletic opportunities, because nothing in Title IX or the Three-Part Test requires an institution to cut teams or reduce opportunities for students who are participating in interscholastic athletics in order to comply with the provisions of Title IX relating to the effective accommodation of the interests and abilities of male and female students.

Based on the Agreement, OCR is closing the investigation as of the date of this letter. OCR will monitor the implementation of the agreement until the District is in compliance with Title IX of the Education Amendments of 1972, 20 U.S.C. § 1681 et seq., and its implementing regulation, 34 C.F.R. § 106.41(c), which were at issue in this case.

In addition, OCR may initiate administrative enforcement or judicial proceedings to enforce the specific terms and obligations of this Agreement. Before initiating administrative enforcement (34 C.F.R. §§ 100.9, 100.10), or judicial proceedings to enforce this Agreement, OCR will give the District written notice of the alleged breach and sixty (60) calendar days to cure the alleged breach.

Further, please be advised that the District may not harass, coerce, intimidate or discriminate against any individual because he or she has filed a complaint or participated in the complaint resolution process. If this happens, the Complainant may file another complaint alleging such treatment.

Under the Freedom of information Act, it may be necessary to release this document and related correspondence and records upon request. In the event that OCR received such a request, we will seek to protect, to the extent provided by law, personally identifiable information, which, if released, could reasonably be expected to constitute an unwarranted invasion of personal privacy.

This letter sets forth OCR's determination in individual OCR cases. This letter is not a formal statement of OCR policy and should not be relied upon, cited, or construed as such. OCR's formal policy statements are approved by a duly authorized OCR official and made available to the public. The Complainant may file a private suit in federal court whether or not OCR finds a violation.

If you or your staff members have any questions regarding this matter, please do not hesitate to contact me or Judith E. Levitt, Deputy Chief Attorney, at 312-730-1560.

Sincerely,

/s/

Ann Cook-Graver Supervisory Attorney Chicago Office

cc: James Bebley, General Counsel Susan O'Keefe, Deputy General Counsel Kathleen Gibbons, Senior Assistant General Counsel

Enclosure: Resolution Agreement

APPENDIX

Male and Female Enrollment and Athletic Participation Rates by Sex in the 84 high schools where girls were underrepresented in the District (2013-14 School Year)

(As reported to OCR by the District)

| | | Student Enrollment | | | Athletic Participation | | | Percentage |
|-------------|-----------------------|----------------------------------|---------------------------------|-----------------|----------------------------------|------------------------------------|-----------------|--|
| High School | | Male Number and Percent | Female Number and Percent | Total Number | Male Number and Percent | Female Number and Percent | Total Number | Point Disparity (ppd) and Additional Participation Opportunities for Females |
| 1 | Al Raby | 248 (48.34%) | 265 (51.66%) | 513 | 136 (56.90%) | 103 (43.10%) | 239 | 8.56 ppd 42 opp. |
| 2 | Albert Lane | 1,841 | 2,279 | 4120 | 838 | 561 | 1399 | 15.22 ppd |
| | Tech | (44.68%) | (55.32%) | | (59.90%) | (40.10%) | | 477 opp. |
| 3 | Alcott | 142 (50.53%) | 139 (49.47%) | 281 | 95 (51.63%) | 89 (48.37%) | 184 | 1.10 ppd 4 opp. |
| 4 | Austin | 95 | 91 | 186 | 24 | 11 | 35 | 17.49 ppd |
| | Bus/Entre | (51.08%) | (48.92) | | (68.57%) | (31.43%) | | 12 opp. |
| 5 | Austin | 129 | 67 | 196 | 56 | 7 | 63 | 23.07 ppd |
| | Poly | (65.82%) | (34.18%) | | (88.89%) | (11.11%) | | 22 opp. |
| 6 | Back of the | 142 | 139 | 281 | 80 | 73 | 153 | 1.76 ppd |
| 7 | Yards | (50.53%) 815 | (49.47%) 869 | 1684 | (52.29%) | (47.71%) 267 | 603 | 5 opp. |
| / | Benito Juarez | (48.40%) | 869 (51.60%) | 1084 | 330 (55.72%) | (44.28%) | 003 | 7.32 ppd 91 opp. |
| 8 | Bowen | 254 | 210 | 464 | 156 | 98 | 254 | 6.68 ppd |
| | Bowen | (54.74%) | (45.26%) | 101 | (61.42%) | (38.58%) | 25. | 31 opp. |
| 9 | Bronzeville | 197 | 319 | 516 | 59 | 52 | 111 | 14.97 ppd |
| | | (38.18%) | (61.82%) | | (53.15%) | (46.85%) | | 44 opp. |
| 10 | C. | 1,292 | 1,087 | 2,379 | 349 | 197 | 546 | 9.61 ppd |
| | Schurz | (54.31%) | (45.69%) | 1.711 | (63.92%) | (36.08%) | 710 | 97 opp. |
| 11 | C. | 718 | 796 (52.58%) | 1,514 | 303 (58.38%) | 216 | 519 | 10.96 ppd |
| 12 | Prosser C. | (47.42%) 942 | (52.58%) 867 | 1,809 | 333 | (41.62%) 293 | 626 | 120 opp. 1.12 ppd |
| 12 | Steinmetz | (52.07%) | (47.93%) | 1,009 | (53.19%) | (46.81%) | 020 | 1.12 ppd 13 opp. |
| 13 | Chicago | 237 | 281 | 518 | 172 | 130 | 302 | 11.20 ppd |
| | Academy | (45.75%) | (54.25%) | | (56.95%) | (43.05%) | | 74 opp. |
| 14 | Chicago | 317 | 334 | 651 | 283 | 165 | 448 | 14.48 ppd |
| | Agricultural | (48.69%) | (51.31%) | | (63.17%) | (36.83%) | | 133 opp. |
| 15 | Chicago | 220 | 185 | 405 | 145 | 66 | 211 | 14.40 ppd |
| 1.0 | Military | (54.32%) | (45.68%) | 000 | (68.72%) | (31.28%) | 25.4 | 56 opp. |
| 16 | Chicago Vocational | 511 (51.62%) | 479 (48.38%) | 990 | 234 (66.10%) | 120 (33.90%) | 354 | 14.48 ppd 99 opp. |
| 17 | C. | 213 | 208 | 421 | 129 | 120 | 249 | 1.22 ppd |
| 1, | Fenger | (50.59%) | (49.41%) | 121 | (51.81%) | (48.19%) | 217 | 6 opp. |
| 18 | Collins | 184 | 200 | 384 | 117 | 54 | 171 | 20.50 ppd |
| | Academy | (47.92%) | (52.08%) | | (68.42%) | (31.58%) | | 73 opp. |
| 19 | Dan H | 75 | 225 | 300 | 39 | 55 | 94 | 16.49 ppd |
| | Williams | (25.00%) | (75.00%) | | (41.49%) | (58.51%) | | 62 opp. |
| 20 | D. Farragut | 595 | 505 | 1,100 | 148 | 79 | 227 | 11.11 ppd |
| | Career | (54.09%) | (45.91%) | | (65.20%) | (34.80%) | | 47 opp. |

Page 12 - Mr. Jessie H. Ruiz

| | | Student Enrollment | | | Athletic Participation | | | Percentage |
|-------------|-----------------------|----------------------------------|---------------------------------|-----------------|----------------------------------|------------------------------------|-----------------|--|
| High School | | Male Number and Percent | Female Number and Percent | Total Number | Male Number and Percent | Female Number and Percent | Total Number | Point Disparity (ppd) and Additional Participation Opportunities for Females |
| 21 | Dr. ML King Jr. | 326 (40.55%) | 478 (59.45%) | 804 | 228 (55.34%) | 184 (44.66%) | 412 | 14.79 ppd 150 opp. |
| 22 | Dyett | 48 (57.83%) | 35 (42.17%) | 83 | 20 (58.82%) | 14 (41.18%) | 34 | 0.99 ppd 1 opp. |
| 23 | E. Tilden Career | 200 (57.97%) | 145 (42.03%) | 345 | 51 (71.83%) | 20 (28.17%) | 71 | 13.86 ppd 17 opp. |
| 24 | E. Foreman | 857 (56.87%) | 650 (43.13%) | 1,507 | 245 (72.27%) | 94 (27.73%) | 339 | 15.40 ppd 92 opp. |
| 25 | E. Richards Career | 189 (49.09%) | 196 (50.91%) | 385 | 100 (52.91%) | 89 (47.09%) | 189 | 3.82 ppd 15 opp. |
| 26 | E. Hirsch | 151 (55.31%) | 122 (44.69%) | 273 | 16 (88.89%) | 2 (11.11%) | 18 | 33.58 ppd 11 opp. |
| 27 | E. Solorio | 565 (52.90%) | 503 (47.10%) | 1,068 | 502 (56.40%) | 388 (43.60%) | 890 | 3.50 ppd 59 opp. |
| 28 | Fr. Douglass | 151 (51.89%) | 140 (48.11%) | 291 | 111 (67.27%) | 54 (32.73%) | 165 | 15.38 ppd 49 opp. |
| 29 | F. Von Steuben | 821 (49.28%) | 845 (50.72%) | 1,666 | 328 (51.49%) | 309 (48.51%) | 637 | 2.21 ppd 29 opp. |
| 30 | G. Corliss | 270 (54.33%) | 227 (45.67%) | 497 | 230 (70.55%) | 96 (29.45%) | 326 | 16.22 ppd 97 opp. |
| 31 | G. Washington | 772 (49.39%) | 791 (50.61%) | 1,563 | 365 (55.47%) | 293 (44.53%) | 658 | 6.08 ppd 81 opp. |
| 32 | G. Westinghse | 391 (34.76%) | 734 (65.24%) | 1,125 | 241 (56.97%) | 182 (43.03%) | 423 | 22.21 ppd 270 opp. |
| 33 | Gr. Lawndale | 182 (51.12%) | 174 (48.88%) | 356 | 96 (60.38%) | 63 (39.62%) | 159 | 9.26 ppd 29 opp. |
| 34 | G. Hubbard | 836 (51.76%) | 779 (48.24%) | 1,615 | 347 (60.56%) | 226 (39.44%) | 573 | 8.80 ppd 97 opp. |
| 35 | Gwendolyn Brooks | 300 (38.31%) | 483 (61.69%) | 783 | 218 (51.29%) | 207 (48.71%) | 425 | 12.98 ppd 144 opp. |
| 36 | HS of Leadership | 52 (38.81%) | 82 (61.19%) | 134 | 33 (47.14%) | 37 (52.86%) | 70 | 8.33 ppd 15 opp. |
| 37 | Hope College Prep | 178 (45.52%) | 213 (54.48%) | 391 | 75 (62.50%) | 45 (37.50%) | 120 | 16.98 ppd 45 opp. |
| 38 | Hyde Park | 487 (48.65%) | 514 (51.35%) | 1,001 | 182 (67.66%) | 87 (32.34%) | 269 | 19.01 ppd 105opp. |
| 39 | J.F. Kennedy | 773 (51.33%) | 733 (48.67%) | 1,506 | 276 (58.85%) | 193 (41.15%) | 469 | 7.52 ppd 69 opp. |
| 40 | J. Hancock | 441 (47.52%) | 487 (52.48%) | 928 | 161 (51.77%) | 150 (48.23%) | 311 | 4.25 ppd 28 opp. |
| 41 | J. Harlan | 500 (54.47%) | 418 (45.53%) | 918 | 172 (68.53%) | 79 (31.47%) | 251 | 14.06 ppd 65 opp. |
| 42 | J. Marshall | 358 (57.37%) | 266 (42.63%) | 624 | 229 (77.63%) | 66 (22.37%) | 295 | 20.26 ppd 104 opp. |
| 43 | Kelvyn | 475 | 415 | 890 | 174 | 96 | 270 | 11.07 ppd |

Page 13 - Mr. Jessie H. Ruiz

| | | Student Enrollment | | | Athletic Participation | | | Percentage |
|-------------|--------------|----------------------------------|---------------------------------|-----------------|----------------------------------|------------------------------------|-----------------|--|
| High School | | Male Number and Percent | Female Number and Percent | Total Number | Male Number and Percent | Female Number and Percent | Total Number | Point Disparity (ppd) and Additional Participation Opportunities for Females |
| | Park | (53.37%) | (46.63%) | | (64.44%) | (35.56%) | | 56 opp. |
| 44 | Kenwood | 833 | 981 | 1,814 | 247 | 181 | 428 | 11.79 ppd |
| | | (45.92%) | (54.08%) | | (57.71%) | (42.29%) | | 110 opp. |
| 45 | Lake View | 741 | 695 | 1,436 | 487 | 348 | 835 | 6.72 ppd |
| | | (51.60%) | (48.40%) | | (58.32%) | (41.68%) | | 109 opp. |
| 46 | Lincoln | 1,006 | 1,224 | 2,230 | 405 | 341 | 746 | 9.18 ppd |
| | Park | (45.11%) | (54.89%) | | (54.29%) | (45.71%) | | 152 opp. |
| 47 | Manley | 241 | 209 | 450 | 180 | 85 | 265 | 14.36 ppd |
| | Career | (53.56%) | (46.44%) | | (67.92%) | (32.08%) | | 71 opp. |
| 48 | Marie S. | 1,521 | 1,461 | 2,982 | 369 | 300 | 669 | 4.15 ppd |
| | Curie | (51.01%) | (48.99%) | | (55.16%) | (44.84%) | | 54 opp. |
| 49 | Marine | 256 | 145 | 401 | 174 | 70 | 244 | 7.47 ppd |
| | Military | (63.84%) | (36.16%) | | (71.31%) | (28.69%) | | 29 opp. |
| 50 | Michele | 216 | 283 | 499 | 158 | 92 | 250 | 19.91 ppd |
| | Clark | (43.29%) | (56.71%) | | (63.20%) | (36.80%) | | 115 opp. |
| 51 | Morgan | 667 | 764 | 1,431 | 339 | 241 | 580 | 11.84 ppd |
| | Park | (46.61%) | (53.39) | | (58.45%) | (41.55%) | | 147 opp. |
| 52 | Multicultura | 151 | 129 | 280 | 40 | 16 | 56 | 17.50 ppd |
| | 1 Academy | (53.93%) | (46.07%) | | (71.43%) | (28.57%) | | 18 opp. |
| 53 | N. Simeon | 645 | 822 | 1,467 | 317 | 151 | 468 | 23.77 ppd |
| | Career | (43.97%) | (56.03%) | | (67.74%) | (32.26%) | | 253 opp. |
| 54 | N. Senn | 572 | 590 | 1,162 | 155 | 138 | 293 | 3.67 ppd |
| | | (49.23%) | (50.77%) | | (52.90%) | (47.10%) | | 22 opp. |
| 55 | Northside | 449 | 620 | 1,069 | 413 | 397 | 810 | 9.00 ppd |
| | College Prep | (42.00%) | (58.00%) | | (51.00%) | (49.00%) | | 173 opp. |
| 56 | Ogden | 373 | 411 | 784 | 124 | 133 | 257 | 0.67 ppd |
| | Intl | (47.58%) | (52.42%) | | (48.25%) | (51.75%) | | 4 opp. |
| 57 | Orr | 376 | 271 | 647 | 210 | 106 | 316 | 8.35 ppd |
| | | (58.11%) | (41.89%) | | (66.46%) | (33.54%) | | 45 opp. |
| 58 | P. | 509 | 679 | 1,188 | 240 | 161 | 401 | 17.00 ppd |
| | Dunbar | (42.85%) | (57.15%) | | (59.85%) | (40.15%) | | 159 opp. |
| 59 | P. | 209 | 163 | 372 | 129 | 25 | 154 | 27.59 ppd |
| | Robeson | (56.18%) | (43.82%) | | (83.77%) | (16.23%) | | 76 opp. |
| 60 | P. | 513 | 544 | 1,057 | 187 | 68 | 255 | 24.80 ppd |
| | Julian | (48.53%) | (51.47%) | | (73.33%) | (26.67%) | | 130 opp. |
| 61 | Phoenix | 253 | 244 | 497 | 183 | 110 | 293 | 11.55 ppd |
| | Military | (50.91%) | (49.09%) | | (62.46%) | (37.54%) | | 66 opp. |
| 62 | R Crane | 42 | 107 | 149 | 15 | 10 | 25 | 31.81 ppd |
| | Tech | (28.19%) | (71.81%) | | (60.00%) | (40.00%) | | 28 opp. |
| 63 | R. | 673 | 593 | 1,266 | 409 | 219 | 628 | 11.97 ppd |
| | Amundsen | (53.16%) | (46.84%) | | (65.13%) | (34.87%) | | 141 opp. |
| 64 | R. | 482 | 674 | 1,156 | 266 | 268 | 534 | 8.11 ppd |
| | Lindbloom | (41.70%) | (58.30%) | | (49.81%) | (50.19%) | | 104 opp. |
| 65 | Roberto | 401 | 300 | 701 | 207 | 83 | 290 | 14.18 ppd |
| | Clemente | (57.20%) | (42.80%) | | (71.38%) | (28.62%) | | 72 opp. |

Page 14 - Mr. Jessie H. Ruiz

| | | Student Enrollment | | | Athletic Participation | | | Percentage |
|-------------|-------------------|----------------------------------|---------------------------------|-----------------|----------------------------------|------------------------------------|-----------------|--|
| High School | | Male Number and Percent | Female Number and Percent | Total Number | Male Number and Percent | Female Number and Percent | Total Number | Point Disparity (ppd) and Additional Participation Opportunities for Females |
| 66 | R Sullivan | 356 (50.28%) | 352 (49.72%) | 708 | 140 (54.05%) | 119 (45.95%) | 259 | 3.77 ppd 19 opp. |
| 67 | Sarah | 245 | 217 | 462 | 109 | 50 | 159 | 15.52 ppd |
| 07 | Goode | (53.03%) | (46.97%) | 402 | (68.55%) | (31.45%) | 137 | 47 opp. |
| 68 | South Shore | 216 | 356 | 572 | 152 | 144 | 296 | 13.59 ppd |
| | International | (37.76%) | (62.24%) | | (51.35%) | (48.65%) | | 107 opp. |
| 69 | Spry | 87 | 102 | 189 | 43 | 41 | 84 | 5.16 ppd |
| | Community | (46.03%) | (53.97%) | | (51.19%) | (48.81%) | | 9 opp. |
| 70 | S. | 869 | 754 | 1,623 | 388 | 277 | 665 | 4.81 ppd |
| | Mather | (53.54%) | (46.46%) | | (58.35%) | (41.65%) | | 60 opp. |
| 71 | TEAM | 195 | 212 | 407 | 90 | 68 | 158 | 9.05 ppd |
| | Englewood | (47.91%) | (52.09%) | | (56.96%) | (43.04%) | | 30 opp. |
| 72 | T. | 714 | 723 | 1,437 | 224 | 202 | 426 | 2.89 ppd |
| | Roosevelt | (49.69%) | (50.31%) | | (52.58%) | (47.42%) | | 25 opp. |
| 73 | Thomas | 1,318 | 1,219 | 2,537 | 367 | 241 | 608 | 8.41 ppd |
| | Kelley | (51.95%) | (48.05%) | 221 | (60.36%) | (39.64%) | | 98 opp. |
| 74 | Uplift | 198 | 156 | 354 | 97 | 58 | 155 | 6.65 ppd |
| | Community | (55.93%) | (44.07%) | 2.41 | (62.58%) | (37.42%) | 100 | 18 opp. |
| 75 | VOISE | 153 | 188 | 341 | 70 | 39 | 109 | 19.35 ppd |
| 76 | Academy Walter | (44.87%) | (55.13%) 481 | 819 | (64.22%) 298 | (35.78%) | 585 | 47 opp. |
| 76 | Payton Prep | (41.27%) | (58.73%) | 819 | (50.94%) | (49.06%) | 363 | 9.67 ppd 137 opp. |
| 77 | Wells | 277 | 319 | 596 | 108 | 72 | 180 | 13.52 ppd |
| / / | Community | (46.48%) | (53.52%) | 390 | (60.00%) | (40.00%) | 100 | 52 opp. |
| 78 | Wendell | 365 | 305 | 670 | 285 | 191 | 476 | 5.39 ppd |
| , 0 | Phillips | (54.48%) | (45.52%) | 070 | (59.87%) | (40.13%) | 170 | 47 opp. |
| 79 | Whitney | 957 | 1,239 | 2,196 | 527 | 404 | 931 | 13.03 ppd |
| | Young | (43.58%) | (56.42%) | _,_, | (56.61%) | (43.39%) | ,,,, | 278 opp. |
| 80 | Wm. H | 1,639 | 1,556 | 3,195 | 518 | 343 | 861 | 8.86 ppd |
| | Taft | (51.30%) | (48.70%) | , | (60.16%) | (39.84%) | | 149 opp. |
| 81 | Wm. | 596 | 519 | 1,115 | 246 | 121 | 367 | 13.58 ppd |
| | Bogan | (53.45%) | (46.55%) | | (67.03%) | (32.97%) | | 93 opp. |
| 82 | Wm. | 433 | 691 | 1,124 | 293 | 282 | 575 | 12.44 ppd |
| | Jones | (38.52%) | (61.48%) | | (50.96%) | (49.04%) | | 186 opp. |
| 83 | Wm. Rainey | 260 | 222 | 482 | 135 | 54 | 189 | 17.49 ppd |
| | Harper | (53.94%) | (46.06%) | | (71.43%) | (28.57%) | | 61 opp. |
| 84 | World | 181 | 172 | 353 | 46 | 31 | 77 | 8.47 ppd |
| | Language | (51.27%) | (48.73%) | | (59.74%) | (40.26%) | | 13 opp. |