

June 2010

# STUDENTS WITH DISABILITIES

## More Information and Guidance Could Improve Opportunities in Physical Education and Athletics



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# Highlights

Highlights of [GAO-10-519](#), a report to congressional requesters

## Why GAO Did This Study

Research has established that physical activity and participation in athletics provides important health and social benefits for children. Certain federal laws help ensure that kindergarten-12th grade schools provide students with disabilities opportunities to participate in physical education (PE) and extracurricular athletics equal to those of their peers. However, national associations have questioned whether students with disabilities receive opportunities similar to their peers.

Regarding students with disabilities, GAO was asked to examine (1) what is known about the PE opportunities that schools provide, and how do schools provide these; (2) what is known about the extracurricular athletic opportunities that schools provide, and how do schools provide these; and (3) how the Department of Education (Education) assists states and schools in these areas. GAO analyzed federal survey data; reviewed relevant federal laws and regulations; and interviewed state, district, and school officials in selected states, as well as parents and disability association officials.

## What GAO Recommends

To improve the opportunities for students with disabilities in PE and athletics, GAO recommends that the Secretary of Education facilitate information sharing among states and schools on ways to provide opportunities and clarify schools' responsibilities under federal law. Education agreed with both of our recommendations.

View [GAO-10-519](#) or [key components](#). For more information, contact Cornelia Ashby at (202) 512-7215 or [ashbyc@gao.gov](mailto:ashbyc@gao.gov).

## STUDENTS WITH DISABILITIES

### More Information and Guidance Could Improve Opportunities in Physical Education and Athletics

#### What GAO Found

Schools provide students with and without disabilities similar opportunities to participate in PE but face challenges when serving students with disabilities. Students with disabilities spend similar amounts of time in PE class and exercising in class as students without disabilities, according to national data and GAO site visits. Most students with disabilities take PE with other students in general PE classes. To facilitate their participation, teachers may make accommodations for some students, such as providing additional modeling or repetition. Many state, district, and school officials GAO interviewed cited teacher preparation and budget constraints as key challenges to serving students with disabilities in general PE classes. For example, they said general PE teachers need more training opportunities on working specifically with students with disabilities, yet resources for training are not always available.

Limited national data suggest that students with disabilities participate in extracurricular athletics, but do not distinguish whether these opportunities are offered through schools or community programs. Among the schools GAO visited, students with disabilities participated in athletics at varying rates, but at consistently lower rates than students without disabilities. Several factors, such as a student's disability type or outreach to students, may affect participation. Some schools or districts GAO interviewed provided opportunities by partnering with community programs or offering athletics designed specifically for students with disabilities, such as wheelchair basketball. District and school officials GAO interviewed cited a lack of information on ways to expand athletic opportunities, lack of clarity regarding schools' responsibilities, and budget constraints as key challenges.

Education has provided little information or guidance on PE or extracurricular athletics for students with disabilities, and some states and districts GAO interviewed said more would be useful. According to agency officials, Education has not provided much information or guidance because it has targeted its limited resources on other areas, such as monitoring priorities specified in federal law. Officials from several states and many districts said they could benefit from Education helping states and schools to share information on practices or resources regarding PE and athletics for students with disabilities. Officials from districts and disability groups also said more clarification from Education on schools' responsibilities under federal law on extracurricular athletics for students with disabilities would be useful.

#### Adapted Athletics



Source: MnPrepPhoto.com © (2008).

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## Abbreviations

ADA	Americans with Disabilities Act of 1990, as amended
Education	Department of Education
IDEA	Individuals with Disabilities Education Act
IEP	Individualized Education Program
NFHS	National Federation of State High School Associations
NLTS2	National Longitudinal Transition Study-2
OCR	Office for Civil Rights
OSDFS	Office of Safe and Drug-Free Schools
OSEP	Office of Special Education Programs
PE	physical education
SEELS	Special Education Elementary Longitudinal Study
SHPPS	School Health Policies and Programs Study
YRBS	Youth Risk Behavior Survey

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United States Government Accountability Office  
Washington, DC 20548

June 23, 2010

The Honorable Tom Harkin  
United States Senate

The Honorable George Miller  
Chairman  
Committee on Education and Labor  
House of Representatives

The Honorable Carolyn McCarthy  
Chairwoman  
Subcommittee on Healthy Families  
and Communities  
Committee on Education and Labor  
House of Representatives

The Honorable Chris Van Hollen  
House of Representatives

The health and social benefits of physical activity and athletic participation for children are well established. These benefits may be even more important for children with disabilities, including those with cognitive and physical disabilities who have a greater risk of being sedentary and having associated health conditions, such as obesity and reduced cardiovascular fitness.<sup>1</sup> Studies have shown that for students with disabilities, regular physical activity may help control or slow the progression of chronic disease, improve muscular strength, control body weight, and enhance students' psychological well-being through additional social ties and improved self-confidence and self-esteem.<sup>2</sup>

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<sup>1</sup>For example, see James H. Rimmer, Jennifer L. Rowland, and Kiyoshi Yamaki, "Obesity and Secondary Conditions in Adolescents with Disabilities: Addressing the Needs of an Underserved Population," *Journal of Adolescent Health*, vol. 41 (2007): 224-229.

<sup>2</sup>For example, see Nancy A. Murphy et al., "Promoting the Participation of Children with Disabilities in Sports, Recreation, and Physical Activities," *Pediatrics*, vol. 121 (2008): 1057-1061 and Coreen M. Harada and Gary N. Siperstein, "The Sport Experience of Athletes with Intellectual Disabilities: A National Survey of Special Olympics Athletes and Their Families," *Adapted Physical Activity Quarterly*, vol. 26 (2009): 68-85.

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Certain federal laws and regulations help ensure that children with disabilities are provided opportunities to participate in physical education (PE) and extracurricular athletics that are equal to those of other children.<sup>3</sup> The Individuals with Disabilities Education Act (IDEA)<sup>4</sup> mandates that states receiving federal grants under the act generally ensure that eligible elementary and secondary school students with disabilities receive a free appropriate public education which is defined as certain special education and related services. Students with a range of disabilities are protected under IDEA, including those with cognitive or emotional disabilities and those with visual, hearing, or orthopedic impairments. Another key federal law protecting students with disabilities is Section 504 of the Rehabilitation Act of 1973 (Section 504),<sup>5</sup> which prohibits entities that receive federal funds, such as elementary and secondary schools, from discriminating against otherwise qualified individuals with disabilities.<sup>6</sup> Under the implementing regulations for both IDEA and Section 504, schools are required to provide students with disabilities equal opportunity for participation in extracurricular activities, which often include athletics.<sup>7</sup> In its administration of these federal laws, the Department of Education (Education) provides oversight and assistance to states and local education agencies, including administering federal funds, monitoring IDEA and Section 504 compliance, and providing guidance and technical assistance.

Despite the health and social benefits of physical activity and the existence of these federal laws, national associations have raised questions about whether elementary and secondary schools are providing students with disabilities similar opportunities in PE and extracurricular athletics as compared to the opportunities of their peers without

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<sup>3</sup>In this report, we define extracurricular athletics as voluntary sports activities that fall outside the required school curriculum. Our focus is on extracurricular athletics that are school-based, such as soccer or track teams which compete against other schools.

<sup>4</sup>20 U.S.C. § 1400 et seq.

<sup>5</sup>29 U.S.C. § 794.

<sup>6</sup>Individuals with disabilities are also protected under the Americans with Disabilities Act of 1990 (ADA), Pub. L. No. 101-336 (1990); 42 U.S.C. § 12101 et seq. For the purposes of Section 504, the Rehabilitation Act defines individuals with disabilities identically to the ADA, and for students in elementary and secondary schools, the U.S. Department of Education interprets the ADA and Section 504 similarly.

<sup>7</sup>Extracurricular activities may also include other recreational activities or special interest groups or clubs.

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disabilities. In light of these concerns, you asked us to address the following:

1. what is known about the PE opportunities that schools provide to students with disabilities, and how do schools provide these opportunities;
2. what is known about the extracurricular athletic opportunities that schools provide to students with disabilities, and how do schools provide these opportunities; and
3. how Education assists states and schools to provide opportunities in PE and extracurricular athletics to students with disabilities.

To address these issues, we examined pertinent data from four nationally representative studies that provided the most current national survey data available for our purposes: the 2006 School Health Policies and Programs Study (SHPPS), the 2005 Youth Risk Behavior Survey (YRBS), 2001 data from the National Longitudinal Transition Study-2 (NLTS2), and 2000 data from the Special Education Elementary Longitudinal Study (SEELS).<sup>8</sup> We reviewed the methods and survey design used in these studies and, through interviews with knowledgeable agency officials and our own analyses, determined that the data we used were sufficiently reliable for our purposes. While more recent data are available from NLTS2 and SEELS, we determined that the data collected during the first wave of these two longitudinal studies were more reliable for the purposes of generating estimates of student participation in PE and extracurricular athletics. In addition, we conducted site visits in five states (California, Florida, Maryland, Minnesota, and New Jersey) and interviewed officials from state departments of education and state athletic associations, school districts, and schools. We also interviewed teachers, coaches, parents, and students. In each state, we visited two school districts and four schools. In addition, we conducted phone interviews with officials from state agencies and district offices selected in Georgia and Texas. We chose

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<sup>8</sup>YRBS and SHPPS are national surveys conducted by the Department of Health and Human Services' Centers for Disease Control and Prevention. YRBS surveys students in grades 9-12 on health-risk behaviors, while SHPPS collects survey information on school health programs and practices from state, district, and school officials, as well as teachers and parents. SEELS and NLTS2 are longitudinal studies funded by Education and consist of nationally representative samples of students who received special education services. Students in SEELS were 6 to 12 years old in at least the first grade in 1999, and students in NLTS2 were 13 to 16 years old and at least in the 7th grade in 2000.

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these seven states because they had relatively higher numbers of students with disabilities nationwide and varied in whether they had policies requiring elementary, middle, and secondary schools to teach PE, and geographic location.<sup>9</sup> We chose school districts that varied in their percentages of students with disabilities, socio-economic status, and classification as urban, rural, or suburban. In deciding between multiple states or districts that met our selection criteria, we purposely chose some that external stakeholders recommended as having innovative or promising practices. To obtain information from parents, we set up informal meetings with assistance from staff in Parent Training and Information Centers in each state we visited. The information and data we gathered from these site visits are not generalizable to all states and districts. In addition to our site visits, we interviewed representatives from 21 national associations, community organizations, and experts in the areas of disability, health, PE, special education, and athletics. We also interviewed Education officials about Education's relevant oversight and assistance efforts and reviewed relevant federal laws, regulations, guidance, and other agency documentation and data. See appendix I for additional information on our methodology.

We conducted this performance audit from June 2009 through June 2010 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

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## Background

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### IDEA and Section 504

IDEA authorizes federal funding for the needs of school-age children with a range of disabilities, such as specific learning disabilities, speech and language impairments, or mental retardation, who need special education services (see fig. 1). In 2007-2008, students covered under IDEA made up about 13 percent of the nation's public prekindergarten through 12th grade school enrollment and, in fiscal year 2007, states received \$10.8 billion in

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<sup>9</sup>We obtained information on states' PE requirements from SHPPS.

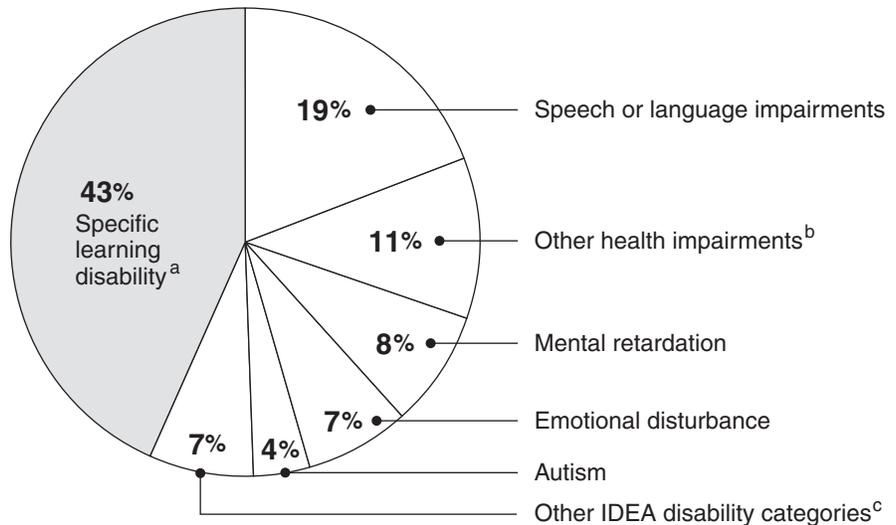
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federal funds to provide services to school-age students.<sup>10</sup> To receive federal funds, states and local educational agencies must identify and evaluate children who have a disability and provide special education and related services, as well as supplementary aids and services when necessary, to those who are eligible. Such services and supports are formulated in an individualized education program (IEP), which is developed, discussed, and documented by a student's IEP team. An IEP team must generally include, among others, the parents of the child, a general education teacher, a special education teacher, and the child when appropriate. IDEA also requires the placement of students in the least restrictive environment—in which students with disabilities are educated with students without disabilities—to the maximum extent appropriate. Regarding PE, IDEA regulations specify that schools must generally provide opportunities for students to participate in regular or general PE classes or, in some cases, specially designed PE if determined by the IEP team. Regarding extracurricular athletics, districts and schools must take steps to provide services to give students with disabilities an opportunity to participate in extracurricular activities, which may include athletics, equal to that of other students.

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<sup>10</sup>For data on student enrollment, see Table 52 in Snyder, T.D., and Dillow, S.A. (2010). *Digest of Education Statistics 2009* (NCES 2010-013). National Center for Education Statistics, Institute of Education Sciences, U.S. Department of Education. Washington, D.C. For data on the amount of federal funding, see Office of Special Education Programs' fiscal year 2007 IDEA Part B State Allocation Table, Section 611.

**Figure 1: IDEA Students Ages 6-21 by Disability Category in 2007: 50 States and District of Columbia**



Source: GAO analysis of Fall 2007 Education data from states found on [www.ideadata.org](http://www.ideadata.org).

Note: Vermont data was not available this year and is not included in calculations for the chart. Numbers do not add to 100 percent due to rounding.

<sup>a</sup>According to IDEA regulations, a “specific learning disability” is a disorder in one or more of the basic psychological processes involved in understanding or in using language, spoken or written, that may affect the ability to listen, think, speak, read, write, spell, or to do mathematical calculations (e.g., dyslexia).

<sup>b</sup>According to IDEA regulations, “other health impairment” is considered as having limited strength, vitality, or alertness due to chronic or acute health problems (e.g., a heart condition or diabetes) that result in limited alertness to the educational environment and adversely affect a child’s educational performance.

<sup>c</sup>Other IDEA disability categories include multiple disabilities (2 percent), developmental delays (2 percent), hearing impairments (1 percent), orthopedic impairments (1 percent), visual impairments (0.4 percent), traumatic brain injury (0.4 percent), and deaf-blindness (less than 0.1 percent).

Section 504 prohibits entities that receive federal financial assistance, including elementary and secondary (K-12) schools, from discriminating against otherwise qualified individuals with disabilities. The Americans with Disabilities Act of 1990, as amended (ADA) is also a broad antidiscriminatory law protecting individuals with disabilities. Education interprets the ADA and Section 504 in a similar manner. While IDEA students are covered under Section 504, other students who are not covered under IDEA may still have a disability as defined under Section 504. Several of the most common disabilities of students included under Section 504, but not always covered under IDEA, are attention deficit

hyperactivity disorder, diabetes, and asthma.<sup>11</sup> In 2006, about 444,000 students with disabilities were covered under 504, and not IDEA, based on the most recent estimates from Education. These students may have an education plan developed under Section 504 that sets forth their needed regular or special education and related aids and services, but the federal requirements for such a plan are much less detailed than for an IEP. Similar to IDEA, Education’s Section 504 regulations require that students with disabilities be provided a free appropriate public education and learn alongside students without disabilities to the maximum extent appropriate. These Section 504 regulations also require that students with disabilities must be provided equal opportunities to participate in PE courses and extracurricular athletics. Unlike IDEA, however, Section 504 does not authorize any federal funding to schools to provide services to students. (See table 1 for more information on IDEA and Section 504.)

**Table 1: Relevant Federal Laws and Requirements Regarding Students with Disabilities**

	<b>Individuals with Disabilities Education Act (IDEA)</b>	<b>Section 504 of the Rehabilitation Act of 1973</b>
General purpose	Provides federal funds to state and local educational agencies to guarantee special education and related services to eligible children with disabilities.	Prohibits discrimination on the basis of disability in programs or activities that receive federal financial assistance.
General coverage	Children, generally ages 3 through 21, with a disability who need special education and related services.	Individuals of all ages who have a disability as defined in the act.
Disability definition	A child with a disability in one of many specific categories, such as speech or language impairment, emotional disturbance, or mental retardation, who needs special education and related services.	A person who has a physical or mental impairment that substantially limits one or more major life activities. <sup>a</sup> Major life activities include walking, communicating, working, reading, learning, concentrating, and thinking.
Approximate numbers of K-12 students	About 5.9 million children ages 6-21 in Fall 2007 for the 50 states and the District of Columbia.	IDEA students are generally protected under Section 504. In addition, according to its most recent available data, Education estimated that about 444,000 K-12 students were covered under Section 504, but not IDEA, in 2006.
Provides federal funding	Yes	No

<sup>11</sup>These conditions may be covered under IDEA in some circumstances under the “other health impairment” category.

	<b>Individuals with Disabilities Education Act (IDEA)</b>	<b>Section 504 of the Rehabilitation Act of 1973</b>
Physical education requirements	Public education agencies must make PE available to children with disabilities unless the school does not offer it to nondisabled students in the same grades. Public education agencies must also provide a child with a disability the opportunity to participate in the regular PE program that is available to nondisabled children unless (1) the child is enrolled full-time in a separate facility or (2) the child needs specially designed PE as prescribed in the child's IEP.	Entities that provide extracurricular services and activities, which may include physical recreational athletics, must afford students with disabilities an opportunity for participation in such services and activities equal to that of other students.  In providing PE courses and athletics to any of its students, entities may not discriminate on the basis of a student's disability and must provide qualified students an equal opportunity to participate.  Separate or different PE and athletic activities may be offered. However, qualified students must continue to have the opportunity to compete for teams or to participate in courses that are not separate or different.
Extracurricular athletics requirements	Each public agency must take steps, including the provision of supplementary aids and services determined appropriate and necessary, to provide nonacademic and extracurricular services and activities, which may include athletics. These must be provided in the manner necessary to afford children with disabilities an opportunity for participation in those services and activities equal to that of other students.	
Administering office	Office of Special Education Programs makes formula grants to states and oversees implementation of IDEA, and it makes discretionary grants in special education program areas.	Office for Civil Rights with 12 regional enforcement offices.

Source: GAO analysis of relevant federal laws and regulations, and other agency documents.

<sup>a</sup>The definition of an individual with a disability also includes someone who has a record of such impairment or is regarded as having such an impairment.

## Federal and State Responsibilities

At the federal level, Education is responsible for administering IDEA, as well as Section 504, as it applies to many educational institutions. The Office of Special Education Programs (OSEP) allocates federal funds to states for their implementation of IDEA programs and monitors states' ability to provide a free, appropriate public education. For example, states must report to OSEP the amount of time that students who are covered under IDEA spend in their state's general education classes, including PE. The Office for Civil Rights (OCR), through its headquarters and 12 regional offices, carries out enforcement activities related to Section 504, the ADA, and other antidiscrimination laws.<sup>12</sup> These activities include investigating

<sup>12</sup>The Department of Justice delegated to Education in 1991 responsibility for investigating complaints relating to public elementary, secondary, and postsecondary schools under Title II of the Americans with Disabilities Act.

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complaints of discrimination on the basis of race, color, national origin, sex, disability, or age. OSEP and OCR also help states and schools meet their federal requirements and improve the quality of education by issuing policy guidance, disseminating information, and providing technical assistance to individual institutions. Education funds and oversees numerous national and regional research and technical assistance providers, such as regional educational laboratories and national clearinghouses that disseminate information, research, and other support to policymakers and educators at the state and local levels. For example, the Office of Special Education and Rehabilitative Services, which includes OSEP, supports a network of more than 40 national technical assistance centers, each with a focus on some aspect of special education.

At state and district levels, various parties may be involved in providing students with opportunities in PE and extracurricular athletics. For instance, many states have requirements regarding their districts' provision of PE, according to data from the Centers for Disease Control and Prevention and the National Association of State Boards of Education. However, policies may vary by state or district, such as the required grades in which PE should be offered, the number of minutes students should be in class, or the specific content and curriculum areas that should be taught. For extracurricular athletics, the National Federation of State High School Associations (NFHS) is the national body that writes the rules of competition for most high school interscholastic sports—the main form of extracurricular athletic competition in schools, which includes varsity and junior-varsity level teams. In turn, each state has its own state high school athletic association which is a voluntary member of the NFHS. According to an NFHS official, NFHS does not establish standards or policies specifically regarding students with disabilities and each state athletic association develops its own standards and policies. In addition, most state high school athletic associations are not part of state departments of education, but are private organizations, according to NFHS officials.

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## Schools Provide Students with and without Disabilities Similar Opportunities in PE, but Face Challenges Serving Students in General PE Classes

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### Schools Provide Similar Opportunities in PE to Students with and without Disabilities

Students with disabilities generally attend PE class about the same amount of time as students without disabilities, according to national data and our site visits. Estimates from YRBS 2005 on high school students indicate that students with physical disabilities or long-term health problems attend PE classes for approximately the same amount of time as those without disabilities. For example, 29 percent of students with physical disabilities or long-term health problems attend PE class 5 days a week compared to 34 percent of students without disabilities (see fig. 2).<sup>13</sup> In 12 schools and seven districts we visited, officials also told us that most students with disabilities are in PE class the same amount of time as students without disabilities. Officials from a few schools said that they actually provide a greater amount of instruction time in PE for some students with disabilities who have specific needs and take both general PE classes and specialized PE classes. National data show that among districts that require PE, many have policies allowing student to be exempt from PE due to long-term physical, medical, or cognitive disabilities. However, exemptions for students with disabilities were very rare according to officials in the 20 schools we visited.<sup>14</sup> Rather than exempting students

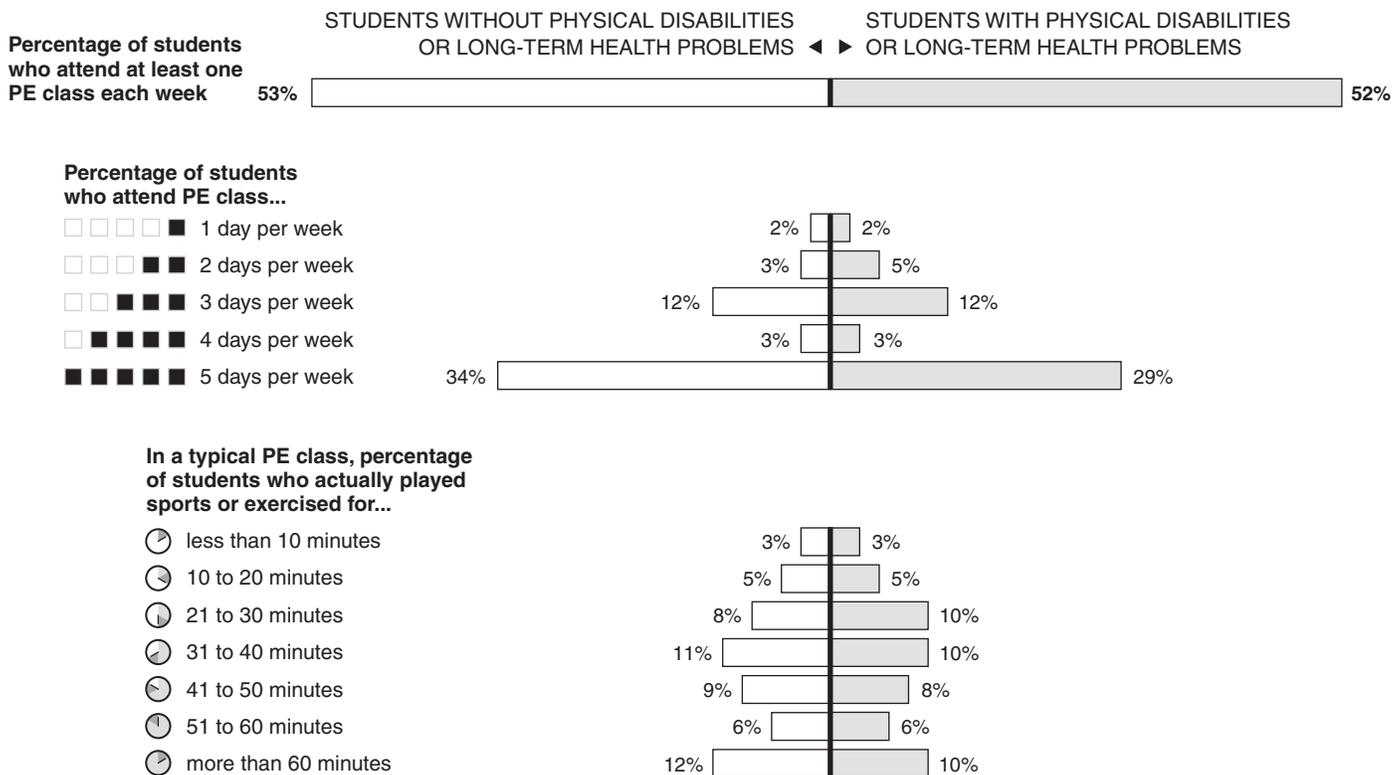
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<sup>13</sup>We also found no statistically significant difference between girls and boys with physical disabilities or long-term health problems in the number of days they attend PE class, according to YRBS 2005 estimates.

<sup>14</sup>According to 2006 SHPPS estimates, among schools that required PE, the percentage of schools that have policies allowing students to be exempt from a required PE class for a long-term physical, medical, or cognitive disability increased from the last SHPPS survey in 2000. It is unclear whether changes to exemption policies have impacted the rates of actual exemptions. We found that while many of the districts we visited technically have policies that allowed students with disabilities to be exempted from PE, very few students in the schools we visited were actually exempted.

with disabilities from PE class entirely, a few schools we visited excuse some students from certain activities. For example, officials from one high school in New Jersey we visited told us that a few students with medical conditions, such as asthma, may be exempt from particular activities but that they are given alternative activities.

**Figure 2: Number of Days per Week Students with and without Disabilities Attend PE Class and Minutes Spent Exercising or Playing Sports in an Average PE Class**



Source: GAO analysis of YRBS, 2005.

Note: Differences in estimates of the number of days attending PE and in time spent exercising are not statistically significant at the 95 percent confidence level among students with and without physical disabilities or long-term health problems. YRBS estimates have 95 percent confidence intervals within plus or minus 7 percentage points unless otherwise noted.

Schools generally provided students with and without disabilities comparable opportunities to participate in PE, according to national data and our site visits. According to 2005 YRBS estimates, students with and without physical disabilities or long-term health problems spend similar amounts of time actually engaged in physical activity per class. For instance, 8 percent of students with physical disabilities or long-term

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health problems spend 41 to 50 minutes in a typical PE class exercising or playing sports compared to 9 percent of students without these disabilities.<sup>15</sup> Many district and schools officials, as well as some students we spoke with, said that students with disabilities often participate in PE to the same extent as their peers without disabilities. In addition, almost all state, district, and school officials we spoke with reported they rarely received complaints about PE from parents of students with disabilities. Several state and district officials said that while they hear complaints from parents in other areas, PE is generally an area in which parents seem satisfied.

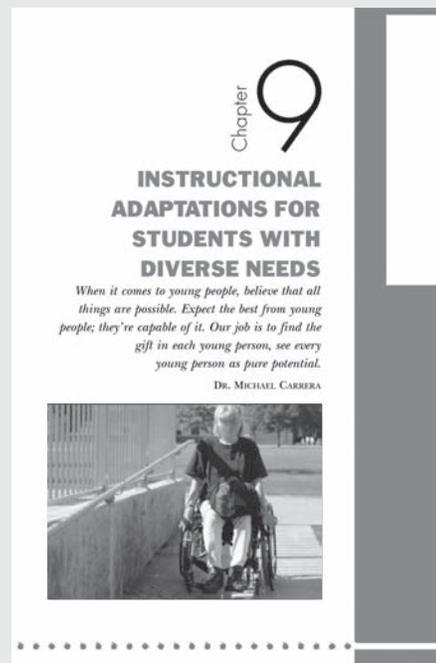
Various factors may affect students' experience in PE, such as their school level (e.g., elementary or middle) or their type of disability. For instance, some parents and school officials said that PE teachers in elementary school may be able to more easily integrate students with disabilities in their classes than those in secondary schools because peers in elementary school are more accepting, the equipment is more varied, and there is less focus on competitive games than in secondary school, which may be harder for students with disabilities to participate. Some district and school officials also said that middle school can be particularly difficult for some students with disabilities who may have more difficulty changing into PE uniforms or opening combination locks on their PE lockers. However, some schools overcame these challenges by waiving their PE uniform policy or providing key locks to accommodate students with disabilities. In addition, some parents and school officials noted that whether a student has a physical or cognitive disability may affect their experience. For example, officials in one school said that while students with physical impairments required more accommodations, they also may have an easier time expressing their needs than students with cognitive disabilities. On the other hand, many district and school officials told us that students with emotional or behavioral disabilities usually participated in the same activities as other students and often excelled physically. Some noted that PE class can provide them a physical outlet that helps them focus their energy.

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<sup>15</sup>These estimates have 95 percent confidence intervals within plus or minus 3 percentage points.

## Schools Use Various Approaches to Provide PE to Students with Disabilities, but Most Included Students in the General PE Class

### State Guidance on PE Classroom Adaptations



Source: New Jersey State Department of Education.

A section of New Jersey's Comprehensive Health Education and Physical Education Curriculum Framework outlines instructional adaptations teachers and others may need to consider for students with disabilities in PE and health. The guidance outlines different types of adaptations and provides examples of these, such as

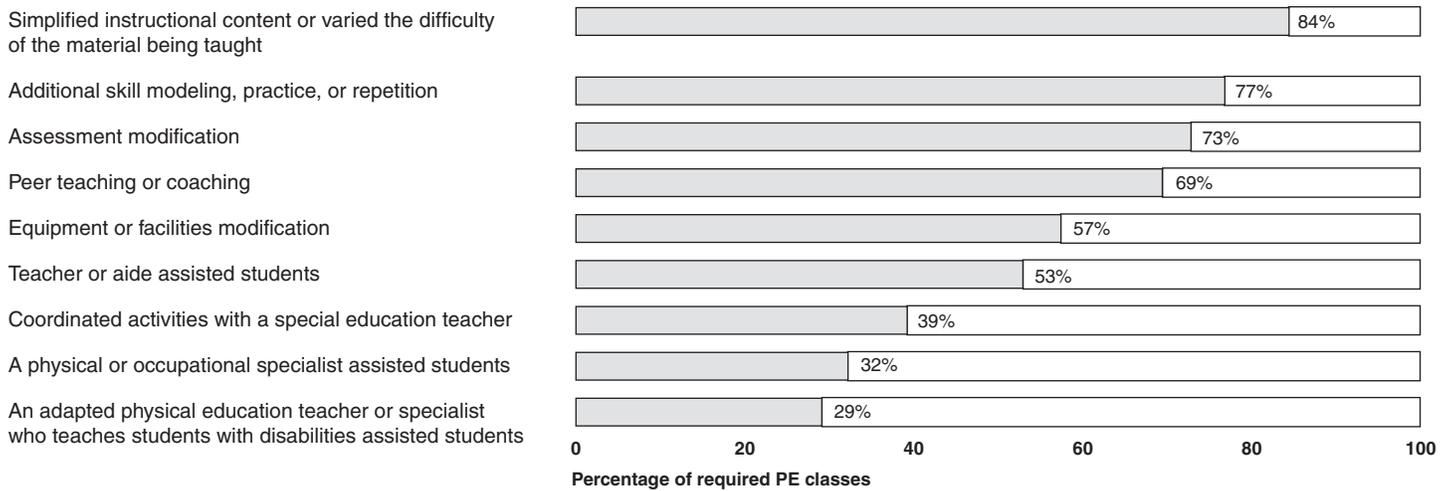
- instructional presentation (e.g., using visuals);
- classroom organization (e.g., regulating noise or lighting);
- student response (e.g., giving credit for improvement); and
- safety (e.g. establishing activity boundaries).

National data indicate that most students with disabilities who took PE did so in general education classes with students who do not have disabilities. Specifically, 92 percent of students with disabilities in grades 1 through 7 took PE in general education classes, according to SEELS estimates. In grades 7 through 12, 88 percent of students with disabilities took PE in general education classes, according to NLTS2 estimates.<sup>16</sup> Similarly, in most of the schools we visited, the majority of IDEA students received PE in a general classroom without any accommodations or modifications. Officials from a number of schools we visited told us that for some students with disabilities who are in special education classes, PE is the one general education class that they attend on a regular basis. School and district officials also noted that the emphasis on educating students with disabilities in an inclusive environment with their peers without disabilities in all subjects also contributes to the high numbers of students in general PE classes.

To facilitate participation for students with disabilities in general PE classes, teachers may make accommodations or modifications for students, which are often informal. According to 2006 SHPPS data and many teachers we interviewed, common informal adjustments that teachers use for students with disabilities in PE class include simplifying the instructional content, providing additional skill modeling or repetition, and having peers without disabilities assist in teaching or coaching (see fig. 3). School officials said that these types of informal accommodations or modifications are generally not determined through the IEP process. In contrast, schools we visited said that more formal accommodations or modifications are usually determined through the IEP process and noted on a student's IEP. These may include modifying assessments (e.g., allowing students to have more time to take tests); using specialized equipment; or having individual aides or assistants work with students during class. For example, officials from a middle school in California told us that some students with disabilities receive accommodations when taking tests for all their classes, including PE, and this is written on students' IEPs. Similarly, officials from schools we visited who had individual aides help some students with disabilities in PE class said the use of these aides was also determined on a case-by-case basis through the IEP process.

<sup>16</sup>SEELS estimates have 95 percent confidence intervals within plus or minus 2 percentage points. NLTS2 estimates have 95 percent confidence intervals within plus or minus 4 percentage points.

**Figure 3: Strategies Used by PE Teachers to Accommodate Students with Disabilities in Required PE Classes**



Source: SHPPS, 2006.

Note: According to SHPPS, these percentages pertain to teachers who taught required PE classes or courses in the 23 percent of these classes that had students with long-term physical, medical, or cognitive disabilities. Estimates have 95 percent confidence intervals within plus or minus 5.5 percentage points unless otherwise noted.

**Minnesota Adapted PE Teacher Certification**



Source: Center on Disability Health and Adapted Physical Activity, University of Wisconsin-La Crosse.

- Under Minnesota state policies, adapted PE must be taught by a PE teacher with an additional adapted PE license based on our review of state documents and interviews with state officials.
- According to state officials, teacher training programs encourage prospective PE teachers to obtain this license to be more marketable, and thus, there are many more certified adapted PE teachers in the state than actual positions.

Some schools accommodate students with more severe motor development delays by providing specialized or “adapted” PE instruction, using various approaches. Nationally, less than 11 percent of students with disabilities under IDEA received adapted PE in 2000 and 2001, according to SEELS and NLTS2 estimates.<sup>17</sup> Among the schools and districts we visited, the provision of adapted PE varied. Officials from 8 of the 20 schools we visited reported that no students received adapted PE services at the time we visited. The remaining schools reported that between 2 and 29 percent of IDEA students—who represent most students with disabilities—received adapted PE. Many districts we visited told us that the provision of adapted PE for individual students was always determined through the IEP process. Districts in Minnesota also relied on standard statewide criteria to provide adapted PE, such as formal tests evaluating motor skills or fitness levels.

<sup>17</sup>Seven percent of students with disabilities between grades 1 and 7 were provided adapted PE services by their school in 2000, according to our estimates of SEELS data; 9 percent of students with disabilities between grades 7 and 12 were provided adapted PE services by their school in 2001, according to our estimates of NLTS2 data. Both of these estimates have 95 percent confidence intervals, within plus or minus 2 percentage points.

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**Strategies Used by Miami-Dade County Public Schools**



Source: National Institutes of Health, Department of Health and Human Services.

- The district promotes the “I Can Do It, You Can Do It” program, sponsored by the National Institutes of Health in the Department of Health and Human Services. Students with physical or cognitive disabilities earn a Presidential Active Lifestyle Award if they participate in 30 minutes of activity 5 days a week for 6 weeks.
- The district also has a hybrid PE and sports program for students with disabilities. During the school day, students participate in activities such as wheelchair basketball or adapted sailing. The district has obtained specialized equipment and facility space through community partnerships, such as with the local sailing club and county golf course.

Schools we visited provide adapted PE using different approaches. Students may receive direct instruction from an adapted PE teacher, the adapted PE teacher may consult with the general PE teacher who actually provides the specific modifications or accommodations to the student, or schools may use a combination of both approaches. Some states require that adapted PE be taught by a PE teacher with a supplemental license, including California and Minnesota, based on state documents we reviewed and state officials we interviewed. Nationwide, 12 states offer or require a supplemental adapted PE license to teach adapted PE, according to the Center on Disability Health and Adapted Physical Activity.<sup>18</sup> Some adapted PE teachers travel to several schools to provide services in the districts we visited. In one district we visited in Florida, the sole adapted PE teacher overcame challenges in scheduling her time by having students who took adapted PE bussed to a central school so she could provide them with services. Some parents we spoke with were pleased with their children’s adapted PE experiences, while others said that their experiences varied and depended on factors such as individual teaching styles and the extent to which students who received adapted PE were integrated into the general PE class.

Fewer students receive PE only in separate or self-contained classes as opposed to receiving PE in general classes with other students, according to national data and our site visits. Our estimates from SEELS indicate that 7 percent were in a self-contained special education classroom for PE in 2000.<sup>19</sup> Among eight districts we visited that could provide estimates, the percentage of students with disabilities who received all of their PE in a self-contained, adapted PE class ranged from 0 percent to 6 percent.<sup>20</sup> However, some self-contained PE classes may follow the same curriculum as general PE classes. Officials in two schools we visited told us that students with severe disabilities were in self-contained special education classes and took general PE together as a class.

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<sup>18</sup>Information provided by researchers at Center on Disability Health and Adapted Physical Activity, University of Wisconsin-LaCrosse.

<sup>19</sup>This estimate has a 95 percent confidence interval within plus or minus 2 percentage points.

<sup>20</sup>Out of the 10 districts we visited, 8 could provide us with data on students who take all of their PE in a self-contained, adapted PE class. District officials we interviewed said that some of their students spend part of their time in general PE and part of their time in a separate PE class. Such instances are not included in these percentages.

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## Schools Cited Teacher Preparation and Budget Constraints as Key Challenges to Serving Students with Disabilities in General PE Classes

A notable challenge to serving students with disabilities in general PE classes is the lack of sufficient training or experience among PE or classroom teachers, according to our interviews and other research.<sup>21</sup> Many state, district, and school officials we interviewed said that PE teachers typically take one course on working with students with disabilities in their undergraduate training. This coursework may not always include practical experience working with students with disabilities, and several studies found that PE teachers reported feeling insufficiently prepared to teach students with disabilities.<sup>22</sup> According to SHPPS, only 32 percent of teachers surveyed who taught required PE classes reported having received training on how to work with students with long-term physical, medical, or cognitive disabilities in the 2 years preceding the 2006 study.<sup>23</sup> Officials from several disability, health, or PE associations said that general PE or classroom teachers who lack training or experience teaching students with disabilities may not know what to do or how to provide the appropriate level of accommodations or effectively adapt their instruction. Their lack of training and experience may result in their excusing some students with disabilities from portions of the class, according to two associations we interviewed. Some parents we spoke with described instances in which their children sat on the side during certain activities or were not encouraged to be as active as their classmates. Several parents noted that while PE teachers may not intend to be exclusionary, they were not sufficiently trained on how to include students with disabilities in their classes.

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<sup>21</sup>In elementary school, PE may be taught by a general classroom teacher, while in secondary school, PE may be taught by a PE teacher (with a teacher's license in PE). According to the National Association for Sport and Physical Education in their 2006 Shape of the Nation report, most states require that secondary school teachers who teach PE be certified or licensed by the state in PE (90 percent for high school and 84 percent for middle school/junior high). In contrast, 57 percent of states require this certification at the elementary school level.

<sup>22</sup>This concern is not unique to physical education. Some officials and parents we spoke with noted that teachers' ability to include students with disabilities in the general education classroom is a concern across all subjects. Prior GAO work has shown that teacher preparation programs vary in the extent to which they provide training on instructing students with disabilities in the general education classroom, and programs face challenges to providing additional training. GAO, *Teacher Preparation: Multiple Federal Education Offices Support Teacher Preparation for Instructing Students with Disabilities and English Language Learners, but Systematic Departmentwide Coordination Could Enhance This Assistance*, [GAO-09-573](#) (Washington, D.C.: July 20, 2009).

<sup>23</sup>This estimate has a 95 percent confidence interval within plus or minus 5 percentage points.

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Some state, district, and school officials we interviewed said teachers who teach general PE need more training opportunities regarding students with disabilities, yet resources for training are not always available. Some officials from states and districts said they provide professional development opportunities to teachers through online training, workshops, or conferences. However, budget shortfalls limited their ability to offer additional training opportunities for PE teachers. Some district officials told us that they would like to receive more information on meeting the needs of students with disabilities in general PE settings. For instance, officials from a rural district in Georgia said that they did not have any teachers who specifically taught adapted PE and all students were taught by a general PE or special education teacher. Officials from this district acknowledged that their teachers would benefit from additional training in adapted PE, but told us that they could only provide training if it were available at a low cost or if they had additional resources.

Officials in many of the districts and schools we visited reported that budget constraints created a challenge to providing PE to students with disabilities, particularly in the general PE classroom. For example, many district and school officials, including PE teachers, told us that budget constraints in their schools have resulted in large general PE classes and have hindered teachers' ability to provide students with disabilities the individual attention they may need. In both of the districts in California that we visited, teachers and school officials said that PE classes can include over 45 students, often with only one teacher. Several teachers noted that they would like to provide more individual attention to students with disabilities in their classes but cannot do so while managing the rest of the class. Another PE teacher in Minnesota said that large classes in a spacious and noisy environment can be particularly hard for students with emotional or behavioral disabilities who are very sensitive to such stimuli. District and school officials said that additional staff, such as paraprofessional aides who could work one-on-one with students with disabilities, would help address the challenge of large classes. However, officials said that budget constraints limit the use of aides. Finally, teachers or district officials in several states told us that limited resources for equipment, including special adapted equipment or facility renovations for outdated gymnasiums, hindered their ability to effectively provide opportunities to students with disabilities.

A few state, district, school, and disability association officials we spoke with cited a lack of importance placed on PE as a school subject compared with academic subjects. Some state, district, and school

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officials noted that the greater emphasis on assessments for reading and math as required by federal law<sup>24</sup> has led them to reduce the number of PE classes that their students are required to take or PE elective courses that they can offer. However, other district officials said their PE offerings have not changed because state laws dictate PE requirements for students, among other reasons.<sup>25</sup> Officials from some districts, schools, disability associations, and parent groups also said that parents of children with disabilities may view PE as a relatively low priority and, subsequently, have low expectations with respect to their children's participation or performance.

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<sup>24</sup>The Elementary and Secondary Education Act of 1965, as amended by the No Child Left Behind Act of 2001. Pub. L. No. 107-110 (2002).

<sup>25</sup>Of the five states we visited, all had PE requirements for students in elementary, middle, and high school, according to state officials and our review of state documents, although specific PE requirements varied.

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## Some Students with Disabilities Participate in Extracurricular Athletics through Different Types of School Teams, but Schools Face Challenges Expanding These Opportunities

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### Limited Data Suggest That Some Students with Disabilities Participate in School Extracurricular Athletics, but Various Factors May Affect Their Participation

National data show that students with disabilities participate in extracurricular athletics but do not fully distinguish whether these athletic opportunities are offered through schools or out-of-school (i.e., through community-based) programs. According to SEELS estimates, 41 percent of students with disabilities in grades 1 through 7 participated in school or community-based extracurricular athletics in 2000. Additionally, according to NLTS2 estimates, 33 percent of students with disabilities in grades 7 through 12 participated in school or community-based extracurricular athletics in 2001.<sup>26</sup> In these studies, more students with disabilities reported participating in school or community-based sports teams than in other extracurricular activities surveyed, such as performance groups (e.g., band or choir), scouting, or special interest groups (e.g., chess or other hobby clubs).<sup>27</sup> However, sports participation was consistently higher for boys with disabilities than for girls with disabilities across age

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<sup>26</sup>SEELS and NLTS2 estimates have 95 percent confidence intervals, within plus or minus three percentage points.

<sup>27</sup>Department of Education, Office of Special Education Programs, *SEELS: The Other 80% of Their Time: The Experiences of Elementary and Middle School Students with Disabilities in Their Nonschool Hours* (Washington, D.C., October 2002) and Department of Education, Office of Special Education Programs, *Life Outside the Classroom for Youth with Disabilities: A Report from the National Longitudinal Transition Study-2 (NLST2)* (Washington, D.C., April 2003)

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groups.<sup>28</sup> In addition, according to our interviews with Education officials and researchers, we found no national data that was reliable for our purpose of comparing the participation of students with disabilities to students without disabilities in extracurricular athletics.

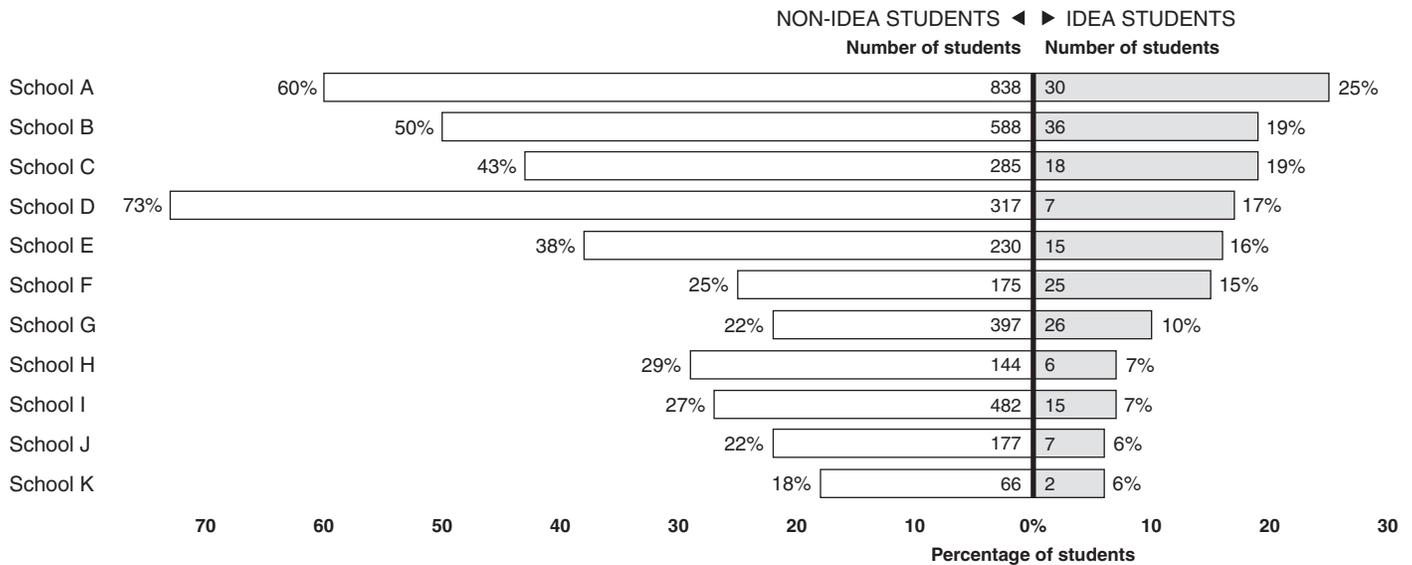
Among the schools we visited, we found that IDEA students participated in school-based extracurricular athletics at varying rates, but at a lower rate than their peers without disabilities. The percentage of IDEA students who participated in “traditional” school-based extracurricular athletics (that is, athletics not specially designed for students with disabilities) ranged from 6 to 25 percent among the 11 schools we visited that could provide estimates.<sup>29</sup> In contrast, the percent of non-IDEA students who participated in traditional extracurricular athletics ranged from 18 to 73 percent in these schools (see fig. 4). In all cases, the participation rates for IDEA students were lower than for non-IDEA students, ranging from 10 to 56 percentage points lower.

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<sup>28</sup>In grades 1 through 7, 45 percent of boys with disabilities participated on a school or community-based sports team compared to 31 percent of girls, according to SEELS estimates. In grades 7 through 12, 37 percent of boys with disabilities participated on a school or community-based sports team compared to 23 percent of girls, according to NLTS2 estimates. Differences between genders are statistically significant at the 95 percent confidence level, and estimates have confidence intervals within plus or minus 5 percentage points.

<sup>29</sup>Most states and districts we visited did not regularly track rates of participation in athletics for students with disabilities but district officials were generally able to compile this information based on our request.

**Figure 4: Percentage of IDEA and Non-IDEA Students Participating in Traditional Extracurricular Athletics in the Schools We Visited**



Source: GAO analysis of participation estimates provided by district and school officials.

Notes: Among schools we interviewed, six elementary schools which did not offer formal extracurricular athletic programs and three high schools which could not provide us with data are not included in the figure. Data for each school we visited can be found in table 3 of appendix II.

A number of factors may contribute to these differences among schools, such as outreach to students with disabilities, priorities of school officials, and the level of competitiveness among athletic teams. Some schools we visited in Florida and California actively reached out to some students with disabilities in an effort to recruit them for extracurricular athletics. Several of the special education teachers in a California school we visited also coached different sports teams; this dual role enabled them to encourage students with disabilities to participate, according to one official. Additionally, the leadership of school officials may affect students' participation in extracurricular athletics, according to some parents, school officials, and officials from disability groups. One parent of a child with a learning disability in California told us that administrators at her daughter's school recognized that extracurricular athletics was an area where she excelled and wrote into her IEP that she could participate even if her grades did not qualify her. In contrast, the competitiveness of some athletic teams can negatively affect participation among students with disabilities. A district official we spoke with in Texas told us that extracurricular athletics in his district were very competitive and that it

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was unlikely that many students with disabilities would make these teams. Additionally, one parent told us that she took her daughter who has a neurological disorder out of the school volleyball team because of competitive pressures from other parents and students. Perceptions among students, parents, and schools can also affect student participation in extracurricular athletics, according to a number of officials from schools and disability organizations we interviewed. Specifically, students with disabilities may not perceive themselves as athletic and therefore are reluctant to try out for teams, while parents or schools may resist the idea of students participating due to safety concerns.

Student participation on sports teams varies by disability. In most of the schools we visited, officials told us that students with disabilities who participated in extracurricular athletics often had mild cognitive disabilities or learning disabilities. Additionally, national data from NLTS2 indicates that students with hearing impairments, speech impairments, learning disabilities, or other health impairments reported participating on sports teams at a higher rate compared to students with orthopedic impairments, mental retardation, visual impairments, autism, or multiple disabilities.<sup>30</sup> Many officials from schools and disability associations we interviewed said that students with physical disabilities have fewer opportunities in extracurricular athletics compared to students with cognitive disabilities because fewer programs were designed for them. For example, officials said that while students with learning or cognitive disabilities could participate in traditional sports teams with little to no modifications, students with physical disabilities may not be able to do so. Officials from several schools and disability groups also noted that Special Olympics has had a strong influence nationally in providing opportunities

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<sup>30</sup>These sports teams could be either school-based or community-based. Differences are statistically significant at the 95 percent confidence level.

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for students with intellectual disabilities but that there is not a similar organization for students with physical disabilities.<sup>31</sup>

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## Schools Took Various Steps to Provide Extracurricular Athletic Opportunities to Students with Disabilities

Officials from all 15 districts we spoke with told us that all students in their districts, including those with disabilities, are allowed to try out for their school's interscholastic athletics teams. In addition, many schools we visited said they have at least some teams that accept all students who try out. These teams were usually those based on individual performance, such as track or swimming, according to school officials. In contrast, other teams, such as soccer or basketball, were very competitive and had a limited number of positions available. Many school officials told us that if a student did not get selected to play on a competitive team, they were encouraged by coaches to play on a team that accepted all students.

### American Association of Adapted Sports Programs (AAASP)



Source: AAASP, Inc.

Georgia's Department of Education and its state athletic association have a partnership with AAASP to offer adapted sports, such as wheelchair basketball and football. Since 1997, AAASP has helped start programs and train coaches in 24 districts in Georgia. Teams are formed based on student ability, and include students across schools and grades within a district.

School officials reported that they provide varying levels of accommodations for students with disabilities on traditional teams, usually depending on the student's disability. For example, a high school we visited in New Jersey provided an interpreter for a deaf student on the baseball team, and a middle school we visited in California modified rules for deaf and blind students on their wrestling team. State athletic associations in Texas and Minnesota sometimes granted exceptions to their policy on student age limits for students with disabilities.<sup>32</sup> Other methods to aid students with disabilities in extracurricular athletics were less formal. Coaches told us that they may vary their style to meet individual student needs as a practice of good coaching but did not provide any specific accommodations for students with disabilities. For example, coaches in schools that we visited in New Jersey and Florida told us that they repeat rules or give instructions by modeling an activity for

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<sup>31</sup>Special Olympics provides year-round sports training and athletic competition in a variety of Olympic-type sports for children ages 8 and older and adults who qualify. To be eligible, athletes must have an intellectual disability, a cognitive delay, or a development disability. (They may also have a physical disability.) Special Olympics does not exclude any eligible athletes due to qualifying scores. Like Special Olympics, the Paralympics is another international sporting organization that is recognized by the International Olympic Committee. Paralympic athletes are generally those with amputations, cerebral palsy, intellectual disabilities, visual impairments, and spinal injuries. Unlike Special Olympics, the Paralympics is focused on elite performance sport and athletes must go through stringent qualification processes to compete.

<sup>32</sup>Some states' athletic associations or districts have policies that prohibit students older than a certain age (e.g., 19 years old) from playing on school athletic teams.

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students with cognitive or learning disabilities in order to help them better understand game rules.

A few schools provided extracurricular athletic opportunities to students with disabilities through formal partnerships with community programs, most commonly Special Olympics. While many schools provided referrals to Special Olympics but did not otherwise facilitate participation, a few schools we visited provided transportation, coaching, or funds to enable students with intellectual disabilities to participate in Special Olympics. Some of these schools also incorporated Special Olympics coaching and activities into class time for students. In addition, a few schools and districts we visited partnered with other community organizations to provide extracurricular athletic opportunities. In Maryland, one high school we visited collaborated with a local golf club to provide extracurricular golf to students with disabilities and an elementary school partnered with the city's parks and recreation program to provide a sports program for these students.

#### Minnesota Adapted Athletics



Source: MnPrepPhoto.com © (2008).

- Since 1992, the Minnesota State High School League has sponsored adapted soccer, floor hockey, and softball.
- More recently, it introduced adapted bowling to address challenges that districts faced regarding the lack of sufficient numbers of students to form a team or great distances between districts that made regular competition difficult. Students go to their local bowling alley to compete “virtually” against students from other schools.
- Across all sports, students with physical impairments and cognitive impairments play on separate teams. Participating students may earn varsity letters.
- About a quarter of the districts in the state offer at least one adapted sports program, according to officials.

Although less common, a few schools we visited offered athletic opportunities to students with disabilities through adapted teams that were overseen by the state athletics association. While students can choose to try out for traditional athletic teams, adapted teams generally target students—such as those with physical or severe cognitive impairments—who may have difficulty participating in traditional teams. Nationally, four states (Georgia, Minnesota, Ohio, and Vermont) offered adapted athletics through their state high school associations in the 2007-2008 school year, according to the NFHS. In addition, state athletic association officials in Maryland, New Jersey, and Florida planned to offer new adapted athletics for students with disabilities in the coming year. Maryland and New Jersey planned to implement these as a result of recent state legislation,<sup>33</sup> as follows:

- Maryland passed the Fitness and Athletics Equity for Students with Disabilities Act in May 2008. Under this new law, the state board and county school systems generally must (1) ensure that students with disabilities have equal opportunity to participate in general (“mainstream”) PE and to try out for traditional (“mainstream”) athletic programs; (2) provide the reasonable accommodations necessary to

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<sup>33</sup>Florida state athletic officials said they decided to start their adapted athletics program because they received a request from a parent and student.

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allow students with disabilities an opportunity to participate to the fullest extent possible in mainstream PE and athletic programs; and (3) ensure that alternative PE and athletic programs are available, such as adapted sports (only students with disabilities) or unified sports (includes students with and without disabilities). County school systems must develop policies and procedures to promote and protect the inclusion of students with disabilities into mainstream PE and athletic programs and report annually to the State Department of Education. The State Board of Education must adopt a model policy to assist with implementation, while the State Department of Education must monitor compliance and provide technical assistance to county school systems.

- New Jersey passed a much less detailed law in August 2009 that directs the New Jersey State Interscholastic Athletic Association to establish interscholastic adapted athletics for students with visual impairments or physical disabilities who are participating in an adapted athletic program developed by a school district. The New Jersey State Interscholastic Athletic Association must require coaches of adapted athletics to receive training specific to that program but the law does not outline other requirements.

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### Lack of Information and Budget Constraints May Prevent Schools from Providing More Athletic Opportunities to Students with Disabilities

Officials from several districts and state athletic associations said they generally lacked information that would help them provide extracurricular athletic opportunities for students with disabilities. For instance, a number of district officials said coaches do not receive training specifically on how to work with students with disabilities. Some parents we spoke with said that coaches who do not have such training can be overly focused on winning and fail to fully include students with disabilities on their teams. Other parents noted that coaches are rarely at IEP meetings, and one parent in Minnesota told us that a coach improperly removed her child from a team for being academically ineligible without considering the student's IEP. Additionally, some states and districts lacked information on how to implement new adapted athletic programs for students with disabilities. For example, while the Florida High School Athletic Association planned to initiate a wheelchair track event in the coming year, state and district officials we spoke with said they had questions about how eligibility would be determined and how to provide the equipment needed for these students to participate. Other state athletic associations we interviewed were hesitant to consider offering adapted athletic programs because they did not know how competitive events would be held or how teams would be formed.

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Further, some districts lacked information and clarity regarding their responsibilities to provide opportunities under Section 504 for students with disabilities who want to participate in extracurricular athletics equal to those provided to other students. Officials in two districts and several disability associations told us that Education’s Section 504 regulations regarding schools’ responsibilities to provide extracurricular opportunities are ambiguous. For example, a few disability associations noted that there is lack of clarity regarding how “equal opportunity” should be defined. Officials from another district questioned whether their responsibilities included providing specifically designed programs for students with disabilities, such as separate adapted athletics, particularly within a school environment focused on greater inclusion for students with disabilities.

State, district, and school officials often cited budget constraints as another key challenge to expanding athletic opportunities to all students, including those with disabilities. Officials from seven of the 10 districts we visited said that overall budget constraints have affected funding for their entire athletics program, including funds for personnel and equipment. For example, a rural district we visited in Florida told us that they do not have the resources to fund many personnel positions or buy equipment and that they had to eliminate their athletic director position this year. Another district in California told us that the state’s budget situation has negatively impacted all extracurricular athletics and the district is considering dropping their sports teams in the near future. In addition, district officials cited as a concern the high cost of transporting students with disabilities. Officials in one district in Florida noted that transporting students with disabilities was the largest cost in the district’s extracurricular athletic program. Some school and district officials we spoke with had concerns about the facilities used for competitions. A district official in Florida noted that many facilities are old and the costs associated with making these fields accessible for students with disabilities would be challenging. Finally, some school officials said that budget limitations for their athletic programs limit their ability to create new adapted teams, due to costs associated with training and maintaining coaches and aides to work with students.

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## Education Has Provided States and Schools Little Support Regarding PE or Athletics for Students with Disabilities, and Many Districts We Visited Said More Would Be Useful

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### Education Has Provided Little Information or Guidance

While OSEP monitors states' implementation of IDEA and provides information, resources, and technical assistance to states and schools on teaching students with disabilities, very little of it is related to PE or extracurricular athletics, according to OSEP officials and our review of Education Web sites. Beyond technical assistance to current or prospective grantees for special education grants, OSEP has not provided any other relevant information or support. OSEP officials said that OSEP has not used its limited resources to provide such information or support because IDEA's monitoring priorities are focused on other areas and the office has not received relevant concerns or complaints from states, schools, or parents.<sup>34</sup>

Similarly, OCR has not widely disseminated any detailed guidance or information on schools' responsibilities to provide opportunities in PE or extracurricular athletics for students with disabilities under Section 504, according to agency officials and our review of OCR's Web site. Based on data from OCR officials, 12,543 complaints were made to its office, from fiscal year 2005 to fiscal year 2009, regarding elementary and secondary school students with disabilities. Of these, 108 of the complaints filed

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<sup>34</sup>IDEA specifies that Education's monitoring priorities are (1) the provision of a free appropriate public education in the least restrictive environment, (2) states' exercise of general supervisory authority, and (3) disproportionate representation of racial and ethnic groups in special education and related services. Monitoring of states' exercise of general supervisory authority includes ensuring that states have systems or procedures to identify and correct noncompliance, resolve disputes in a timely manner, and improve educational results and functional outcomes for children with disabilities, according to Education officials and monitoring guidance.

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between fiscal year 2005 and fiscal year 2009 (less than 1 percent) pertained to discrimination regarding student participation in PE or extracurricular athletics. From these 108 complaints, we reviewed a subset of 20 and found that 16 alleged that a student was denied equal opportunity to participate in extracurricular athletics.<sup>35</sup> When resolving a Section 504 complaint investigation, OCR may provide detailed guidance or training to help individual districts or schools meet their responsibilities regarding PE or athletics. However, according to OCR officials, such guidance is tailored to the needs of the district or school based on facts obtained through an OCR investigation, and OCR has not yet issued guidance specifically on Section 504's requirements concerning PE or athletics. Our review of OCR guidance found several documents that state that students with disabilities may not be excluded on the basis of a disability from an extracurricular activity, which may include athletics, and that students must be provided opportunities to participate in these activities equal to those of other students. However, with regard to PE and extracurricular athletics, these documents do not provide information beyond what is stated in the Section 504 regulations. In contrast, OCR has provided more detailed guidance in other civil rights areas, such as letters, pamphlets, and question and answer sheets.<sup>36</sup> OCR officials said they have not yet issued additional guidance on extracurricular athletic opportunities for students with disabilities in part due to resource constraints and their focus on other areas of civil rights, such as gender discrimination in athletics or harassment based on race, sex, and

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<sup>35</sup>We reviewed additional information from OCR on all of the relevant complaints from the 7 states we interviewed. Of 20 complaints, 14 were focused on extracurricular athletics, one was focused on PE, and two were focused on both PE and extracurricular athletics. The focus of three complaints was unclear based on the information provided. Regarding the outcome of the 20 complaints we reviewed: 11 were administratively closed (complainant withdrew the complaint, no written consent was received, or complaint allegation was currently being investigated elsewhere); 6 were closed due to insufficient evidence of discrimination (including one case in which one allegation was dismissed because it was no longer appropriate for complaint resolution, and there was insufficient factual basis of discrimination concerning the second allegation); and 3 were resolved with a resolution agreement.

<sup>36</sup>For example, OCR issued "Dear Colleague" letters to remind schools, districts, and others of their responsibilities under federal laws and regulations, such as prohibiting the discrimination of students with disabilities who are otherwise qualified to participate in accelerated academic programs or prohibiting discrimination on the basis of sex in education programs or activities. Such letters have highlighted the requirements under federal law and implementing regulations, provided examples of deficiencies or violations, and reminded recipients that OCR enforcement offices are available to answer questions or provide additional technical assistance.

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disability. They also noted that these areas have received more official complaints and persistent concerns from constituents such as parents and community groups.

Through several grant programs, Education has administered a relatively small amount of funds specifically to support PE or extracurricular athletic opportunities for students with disabilities. For example, OSEP administers a grant program that provides funding to institutes of higher education for the development of special education personnel. In fiscal year 2009, of the \$91 million administered for these grants, about 2 percent was used to support programs intended to provide undergraduate or graduate training in the area of adapted PE. In the same fiscal year, OSEP also administered about \$8 million, as specifically directed by Congress, to support Special Olympics programs. These federal funds are administered under the Special Olympics Sport and Empowerment Act of 2004 and are intended to increase the participation of individuals with intellectual disabilities in sports and competitive activities. They are also used to design and implement Special Olympics education programs that can be integrated into classroom instruction. In addition, the Office of Safe and Drug-Free Schools (OSDFS) administers the Carol M. White Physical Education Program—the only dedicated PE program sponsored by Education. However, according to OSDFS officials, less than 1 percent of the program’s overall funding of \$77 million in fiscal year 2009 was used to serve the specific needs of students with disabilities.<sup>37</sup> To serve these needs, grantees used funds to purchase specialized equipment or provide training to teachers and staff on how to adapt their general PE programming and activities for students with disabilities.<sup>38</sup>

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<sup>37</sup>The amount and percentage of the Carol M. White Physical Education Program grants used to serve the specific needs of students with disabilities was provided by OSDFS program officials. Officials said that they provided these by reviewing grant documents, such as applications and annual reports, and grant files and by corresponding directly with grantees. Officials said they did not include grants that indicated that they were serving students with disabilities in their regular PE programs but did not provide services or equipment specifically for students with disabilities.

<sup>38</sup>OSDFS officials who manage the Carol M. White Physical Education Program told us that while they do not currently coordinate with OSEP officials on providing technical assistance to grantees to help them better address the needs of students with disabilities, they plan to do so with the fiscal year 2010 grantee cohort.

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## Some State and District Officials We Interviewed Said More Information and Guidance Would Be Useful

Officials from several states and many districts we interviewed said that they could benefit from Education helping states and schools share relevant information, such as practices or resources regarding PE and extracurricular athletics for students with disabilities. For example, officials from one state told us that when they recently developed new guidance for schools in PE and extracurricular athletics for students with disabilities, they could have benefited from information on what other states were doing in these areas. Officials from another state noted that Education could collect information on promising practices and share these with institutes of higher education that offer PE teacher training programs. Additionally, officials from 14 out of 15 districts we interviewed indicated that additional information or resources from Education on how to offer PE or extracurricular athletic opportunities to students with disabilities would be useful. For example, an adapted PE coordinator in a California district said that while he draws on existing informational resources, such as private sector Web sites<sup>39</sup> and state or local conferences, he is constantly looking for additional information from others in his field on good practices and policies. Similarly, a PE and health director in a Florida district noted that as more states implement new wheelchair track and field activities in the general high school athletic program, supporting information and procedural practices would be helpful.

Further, a number of officials from various associations we interviewed, including those representing special education, PE, and adapted sports, said that Education should share information on successful practices or provide informational resources such as factsheets or toolkits. Some association officials also said that Education could give additional attention to PE or extracurricular athletics, by providing information online or promoting greater awareness through media campaigns. This attention would increase awareness among schools about the types of opportunities that could be provided, promote interest among students with disabilities to participate in such activities, and address concerns and questions among parents.

Officials from many districts and several disability groups also said that additional guidance from Education, specifically on extracurricular athletics, would be useful. Officials in 12 of 15 districts we spoke with told us that additional clarification and communication from Education

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<sup>39</sup>Teachers mentioned [www.PEcentral.com](http://www.PEcentral.com) and [www.PELinks4U.org](http://www.PELinks4U.org) as examples of online resources they use.

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regarding schools' responsibilities under Section 504 in providing extracurricular athletics to students with disabilities would be useful. Specifically, one district official noted that the lack of clarity in federal requirements regarding how schools should define and provide equal opportunities serves as a disincentive for schools to take proactive steps to provide additional opportunities for students with disabilities. Another said that while most districts give a "good faith effort" to provide equal opportunities in extracurricular activities, including athletics, district officials probably do not fully understand what it means to provide equal opportunities until a problem arises, such as parent concerns or complaints. According to this official, districts would benefit from additional information on the legal issues or processes involved in allowing students with disabilities to participate in extracurricular athletics, as well as how to document instances in which a student is or is not allowed to participate. Officials from another district noted that school responsibilities related to special education services or supports for activities that occurred after school, such as extracurricular athletics, as opposed to those during the school day, were not entirely clear. Similarly, officials from several disability groups noted that OCR could do more to ensure that schools provide equal opportunities in extracurricular athletics, such as by reminding schools of their responsibilities and what they entail (e.g., through informational factsheets). Officials from one disability association also said that they do not believe parents and students with disabilities know where to turn for help with respect to problems regarding extracurricular athletics and that OCR could help inform parents and schools by issuing a letter reminding them that OCR is a resource.

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## Conclusions

All students, including those with disabilities, benefit from the positive effects that physical activity and school athletics have on an individual's health, social well-being, and self-esteem. While available data show that students with disabilities generally are participating in physical education classes to a similar extent as students without disabilities and that some also are involved in school sports, we found that many districts and schools we visited are interested in improving how they provide physical education and athletic opportunities to these students. Garnering additional resources to provide such opportunities is difficult at a time when states and districts are operating under severe fiscal constraints. However, certain districts and schools may have developed approaches or activities to engage students with disabilities more fully in the PE classroom or in extracurricular athletics, and leveraging their expertise could be helpful to other schools that face challenges in these areas. Some

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schools may also be uncertain about their exact responsibilities to provide opportunities to students with disabilities equal to those of other students, particularly regarding extracurricular athletics. Without additional clarification from Education, schools may not be providing some students full access to these opportunities. While Education has not addressed these issues because it has targeted its limited resources to other areas, focusing some of its existing resources on helping schools provide opportunities in PE and extracurricular athletics could yield important benefits and enable students with disabilities to more fully experience the rewards of physical activity.

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## Recommendations for Executive Action

To help states and schools access existing knowledge and resources, we recommend that the Secretary of Education facilitate information sharing among states and schools on ways to provide opportunities in PE and extracurricular athletics to students with disabilities. For instance, Education could provide Web site links to resources or practices used by states, districts, schools, or organizations in PE or extracurricular athletics for students with disabilities. Such information could be posted on its Web site or discussed at conferences or Webinars.

To ensure that schools are aware of their responsibilities and that students with disabilities consistently have opportunities to participate in extracurricular athletics equal to those of other students, we recommend that Education clarify and communicate schools' responsibilities under Section 504 of the Rehabilitation Act regarding the provision of extracurricular athletics. For example, Education could provide clarifying guidance to schools through its Web site or at conferences.

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## Agency Comments and Our Evaluation

We provided a draft of the report to the Department of Education for review and comment. Education's written comments are presented in appendix IV. Education agreed with our two recommendations to provide more information and guidance. Specifically, Education concurred that further information sharing on providing opportunities in PE and extracurricular athletics to students with disabilities would be helpful to states, schools, and students. It plans to identify useful information on this subject and share such information by posting it on its Web site, [www.ed.gov](http://www.ed.gov). Education also agreed that it is important for schools to be aware of their responsibilities under Section 504 to provide opportunities in extracurricular athletics equal to those of other students and plans to issue additional guidance addressing this in fiscal year 2011. It also

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provided technical comments, which we incorporated throughout the draft as appropriate.

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We are sending copies to appropriate congressional committees, the Secretary of Education, and other interested parties. The report also will be available at no charge on the GAO Web site at <http://www.gao.gov>.

If you or your staff have any questions about this report, please contact me at (202) 512-7215 or [ashbyc@gao.gov](mailto:ashbyc@gao.gov). Contact points for our Offices of Congressional Relations and Public Affairs may be found on the last page of this report. Key contributors to this report are listed in appendix V.

*Cornelia M. Ashby*

Cornelia M. Ashby  
Director, Education, Workforce,  
and Income Security Issues

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# Appendix I: Scope and Methodology

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To address the objectives of this study, we used a variety of methods. Specifically, we

- examined pertinent data from four nationally representative studies;
- conducted site visits in five states and phone interviews with two additional states;
- conducted 21 interviews with representatives from national associations, community organizations, parent advocacy centers, or researchers in the areas of disability, health, physical education (PE), special education, and athletics; and
- interviewed officials from the Department of Education (Education) about Education’s oversight and technical assistance efforts, and reviewed relevant federal laws, regulations, guidance, and other agency documentation and data pertaining to PE and extracurricular athletics for students with disabilities.<sup>1</sup>

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## National Datasets

To obtain national information on the extent to which schools provide students with disabilities opportunities in PE and extracurricular athletics, we identified four nationally representative studies with the most recent data available for our purposes. Specifically, we examined pertinent data from the 2005 Youth Risk Behavior Survey (YRBS) and cited published data from the 2006 School Health Policies and Programs Study (SHPPS).<sup>2</sup> Both studies are administered by the Department of Health and Human Services’ Centers for Disease Control and Prevention. YRBS surveys students in grades 9 through 12 on health-risk behaviors, and SHPPS collects survey information on school health programs and practices from state, district, and school officials, as well as teachers and parents. We also examined 2001 data from Education’s National Longitudinal Transition

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<sup>1</sup>Specifically, we reviewed data provided by Education on relevant grants, as well as complaints received by the Office for Civil Rights regarding PE or athletic opportunities for elementary and secondary school students with disabilities under Section 504. Based on interviews with agency officials, we determined these data were sufficiently reliable for the purposes of this report.

<sup>2</sup>See Centers for Disease Control and Prevention, *Fact sheet: SHPPS 2006: Physical Education for Students with Disabilities*; and Sarah M. Lee, Charlene R Burgeson, Janet E. Fulton, and Christine G. Spain, “Physical Education and Physical Activity: Results From the School Health Policies and Programs Study 2006,” *The Journal of School Health*, vol. 77, no. 8 (October 2007): 435.

Study-2 (NLTS2) and 2000 data from Education’s Special Education Elementary Longitudinal Study (SEELS). To calculate the percentage of students with disabilities in these studies who did not participate in sports, we included students who reported not participating in any extracurricular activities, as well as students who reported participating in some extracurricular activities but not sports. SEELS and NLTS2 consist of nationally representative samples of students who received special education services. Students in SEELS were 6 to 12 years old and in at least the first grade in 1999, and students in NLTS2 were 13 to 16 years old and in at least the seventh grade in 2000 (see table 2).

**Table 2: National Studies We Examined That Contain Data about Students with Disabilities in PE and Extracurricular Athletics**

Study	Funding agency	Year	Focus	Groups surveyed	Definition of disability	Web site as of 4/7/2010
<i>Department of Education</i>						
Special Education Elementary Longitudinal Study (SEELS)	Office of Special Education Programs	2000 <sup>a</sup>	Experience of students with disabilities transitioning from elementary and middle school to middle and high school	Students with disabilities, parents, teachers, and school administrators	Student is receiving special education services (has a disability covered by IDEA)	<a href="http://www.seels.net/grindex.html">http://www.seels.net/grindex.html</a>
National Longitudinal Transition Study-2 (NLTS2)	National Center for Special Education Research	2001 <sup>b</sup>	Experience of students with disabilities transitioning from secondary school into early adulthood	Students with disabilities, parents, teachers, and school administrators	Student is receiving special education services (has a disability covered by IDEA )	<a href="http://www.nlts2.org/index.html">http://www.nlts2.org/index.html</a>
<i>Centers for Disease Control and Prevention</i>						
School Health Policies and Programs Study (SHPPS)	Division of Adolescent and School Health, National Center for Chronic Disease Prevention and Health Promotion	2006	Components of school health policies and programs, including physical education and activity	State, district, and school officials, and health and physical education teachers	Survey asks about policies and practices related to students with long-term physical, medical, or cognitive disabilities	<a href="http://www.cdc.gov/HealthyYouth/SHPPS/">http://www.cdc.gov/HealthyYouth/SHPPS/</a>

Study	Funding agency	Year	Focus	Groups surveyed	Definition of disability	Web site as of 4/7/2010
Youth Risk Behavior Survey (YRBS)	Division of Adolescent and School Health, National Center for Chronic Disease Prevention and Health Promotion	2005 <sup>c</sup>	Health-risk behaviors and prevalence of obesity and asthma among youth and young adults	Students in grades 9-12 with and without disabilities	Survey asks students if they have any physical disabilities or long-term health problems	<a href="http://www.cdc.gov/HealthyYouth/yrbs/index.htm">http://www.cdc.gov/HealthyYouth/yrbs/index.htm</a>

Source: GAO.

<sup>a</sup>SEELS data were collected between 1999 and 2004. This report uses the first wave of data, which were collected in 2000.

<sup>b</sup>NLTS2 data were collected between 2000 and 2009. This report uses the first wave of data, which were collected in 2001.

<sup>c</sup>YRBS is conducted every 2 years. YRBS was conducted in 2007 and 2009, but 2005 is the only year that student respondents were asked whether they had a disability.

We selected these sources, in consultation with GAO methodologists, because they contained nationally representative information about the participation of students with disabilities in PE and extracurricular athletics and were determined to be sufficiently reliable for the purposes of our report. We examined the studies' technical documentation to determine their purpose, the population described, the sample surveyed, data collection methods, and the focus of questions and variables related to students with disabilities and PE and extracurricular athletics. Using this documentation, and through interviews with knowledgeable agency officials, we evaluated the reliability and quality of these data, as well as the extent to which they could be used to answer our questions. Additionally, while more recent data are available from NLTS2 and SEELS, we determined, through interviews with knowledgeable agency officials and our own analyses, that the data collected during the first wave of these two longitudinal studies were preferable, for substantive and technical reasons, for the purposes of our report. Such substantive issues included relevant student grade levels, and technical reasons included high attrition rates in later waves. We used the same methodology as Education to produce estimates on the participation in extracurricular athletics among students with disabilities. We determined that the data we analyzed were sufficiently reliable for our purposes.

We assessed the quality, reliability, and usability of the data for reporting descriptive statistics on the demographic characteristics of students with disabilities (e.g., grade level, gender, and type of disability), and their participation in PE and extracurricular athletics. Because each of the three surveys we provided estimates for (SEELS, NLTS2, and YRBS) followed a

selection procedure based on random selections, each sample is only one of a number of samples that might have been drawn.<sup>3</sup> To assess the precision of estimates from these three surveys, we calculated confidence intervals at the 95 percent level for each measure. A confidence interval gives an estimated range of values, calculated from sample data, which is likely to include the true measure of the population.<sup>4</sup> All percentage estimates from SEELS and NLTS2 used in this report have 95 percent confidence intervals within plus or minus 4 percentage points, unless otherwise noted. All percentage estimates from YRBS used in this report have 95 percent confidence intervals within plus or minus 7 percentage points, unless otherwise noted. All SHPPS estimates have 95 percent confidence intervals within plus or minus 5.5 percentage points of the estimates, unless otherwise noted. All comparisons made between groups are significant, unless otherwise noted. We analyzed data from YRBS, SEELS, and NLTS2 using SUDAAN (Survey Data Analysis)<sup>®</sup>,<sup>5</sup> a statistical analysis software package with capabilities to analyze surveys with a stratified, multistaged cluster sampling design, such as that found in YRBS, SEELS, and NLTS2.

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## Site Visits

To address all three of our objectives, we conducted site visits in five states (California, Florida, Maryland, Minnesota, and New Jersey) and interviewed officials from state departments of education, state athletic associations, school districts, and schools. We also interviewed teachers, coaches, parents, and students. In each of these states we visited two school districts and four schools. In addition, we conducted phone interviews with officials from state agencies and two to three school district offices in Georgia and Texas. We selected these seven states because they were in the top half of states in numbers of both IDEA students and Section 504 students and varied in whether they had policies requiring elementary, middle, and secondary schools to teach PE, and

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<sup>3</sup>SEELS and NLTS2 used a two-stage process to generate a stratified cluster sample of students receiving special education in a nationally representative sample of local education areas and a sample of state-supported special schools. YRBS used a three-stage stratified cluster sample to produce a representative sample of students in grades 9 through 12.

<sup>4</sup>If independent samples are taken repeatedly from the same population and a confidence interval is calculated for each sample, then a certain percentage of the intervals will include the unknown population measure. The confidence interval is often calculated so that the percentage is 95 percent.

<sup>5</sup>Research Triangle Institute, *SUDAAN: User's Manual, Release 8.0*, vols. 1 and 2 (Research Triangle Park, N.C.: Research Triangle Institute, 2001). SUDAAN<sup>®</sup> is a registered trademark of the Research Triangle Institute.

geographic location.<sup>6</sup> We chose school districts that provided variation in their percentages of students with disabilities, socio-economic status,<sup>7</sup> and classification as urban, rural, or suburban. In deciding between multiple states or districts that met our selection criteria, we purposely chose some that external stakeholders recommended as having innovative or promising practices. We spoke with parents by contacting one to two Parent Training and Information Centers in each state we visited.<sup>8</sup> These parent centers are funded by Education and provide information and support to families of children with disabilities of all ages. For this study, staff from these centers asked parent members to voluntarily meet with GAO to share their children's experiences in PE and extracurricular athletics. At some meetings, children also attended with their parents and shared their views. We cannot generalize to all states, school districts, or schools based on these site visits.

Through our site visits and phone interviews, we gathered information on relevant state and district policies, available data or estimates on students' participation in PE and extracurricular athletics, and factors that may affect participation. We also inquired about the approaches districts and schools use to provide opportunities in PE and extracurricular athletics, key challenges to providing these opportunities, and areas in which federal assistance has been or would be useful. When possible, we reviewed written documentation and policies from state agencies, districts, and schools. We also observed some classrooms and athletic practices and spoke with groups of students at schools we visited. To enhance the consistency of the information we obtained from interviews, we used structured sets of questions for officials from state agencies, district offices, and schools, as well as parents. We analyzed interview information by developing and testing a coding structure and coding the interviews using NVivo, a qualitative analysis software. One team member coded all the interviews, and another reviewed 100 percent of the coded output for accuracy.

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<sup>6</sup>We obtained information on states' PE requirements from the 2006 SHPPS of the Department of Health and Human Services' Centers for Disease Control and Prevention.

<sup>7</sup>Socio-economic status was gauged by using percentages of students receiving free or reduced-price lunch.

<sup>8</sup>We contacted a parent center in Florida and met with center staff, but no parents attended our meeting. We met with parents in one parent center in New Jersey. Staff from an additional parent center in New Jersey held an informal discussion with a group of parents to discuss our questions, which GAO staff was unable to attend. Center staff sent us the minutes from that discussion.

# Appendix II: Student Participation in Physical Education and Extracurricular Athletics in District and Schools We Visited

Using a short questionnaire, we obtained estimates from officials in the districts and schools we visited of the number of students with disabilities in PE and extracurricular athletics. We inquired about students covered under IDEA, as well as those covered under Section 504, but not IDEA. However, we did not include numbers of students covered only under Section 504 in these tables due to the number of missing responses and the few students in each district or school in this group. We visited two schools in each district we visited.

**Table 3: IDEA Student Participation in PE among Schools and Districts Visited**

	Total student enrollment	Total IDEA students	IDEA students in general PE with no accommodations or modifications		IDEA students in general PE with some accommodations or modifications		IDEA students who receive adapted PE		IDEA students exempt from PE	
			Number	Percent	Number	Percent	Number	Percent	Number	Percent
<b>Districts</b>										
District 1	82,260	13,908	7,674	55%	13	0%	296	2%	0	0%
District 2	2,747	341	333	98	0	0	8	2	0	0
District 3	14,381	1,626	1,391	86	6	0	105	6	0	0
District 4	19,094	2,600	2,400	92	200	8	58	2	x	x
District 5	6,458	856	598	70	77	9	156	18	1	0.1
District 6	49,138	4,609	x	x	x	x	422	9	0	0
District 7	345,458	38,339	x	x	x	x	x	x	x	x
District 8	39,481	7,058	6,658	94	400	6	0	0	0	0
District 9	4,320	569	x	x	x	x	57	10	0	0
District 10	30,385	4,171	x	x	x	x	91	2	1	0.02
<b>Schools</b>										
School A	1,506	120	103	86	10	8	4	3	0	0
School B	1,368	188	x	x	x	x	15	8	0	0
School C	765	97	94	97	0	0	2	2	0	0
School D	474	41	13	32	13	32	0	0	1	2
School E	694	92	90	98	0	0	2	2	0	0
School F	855	166	133	80	33	20	22	13	0	0
School G	2,017	248	243	98	0	0	5	2	0	0
School H	582	83	67	81	16	19	16	19	0	0
School I	2,046	228	29	13	0	0	28	12	x	x
School J	903	110	50	45	1	1	32	29	1	1
School K	401	31	31	100	0	0	0	0	0	0
School L	1,652	327	327	100	0	0	0	0	0	0

**Appendix II: Student Participation in Physical Education and Extracurricular Athletics in District and Schools We Visited**

	Total student enrollment	Total IDEA students	IDEA students in general PE with no accommodations or modifications		IDEA students in general PE with some accommodations or modifications		IDEA students who receive adapted PE		IDEA students exempt from PE	
			Number	Percent	Number	Percent	Number	Percent	Number	Percent
School M	1,978	298	200	67	10	3	20	7	x	x
School N	1,683	159	146	92	x	x	13	8	x	x
School O	522	63	0	0	63	100	0	0	0	0
School P	747	90	89	99	1	1	0	0	0	0
School Q	735	72	65	90	13	18	4	6	0	0
School R	474	69	68	98	1	2	0	0	0	0
School S	461	79	x	x	x	x	15	19	0	0
School T	478	54	54	100	0	0	0	0	0	0

Source: Participation estimates provided by district and school officials we interviewed.

Notes: Some students may not have been enrolled in PE in the semester we visited, and the number of students in the individual categories may not equal the total number of IDEA students.

X means "don't know" or no response was provided.

**Table 4: IDEA and Non-IDEA Student Participation in School-Based Traditional Extracurricular Athletics among Districts and Schools Visited**

	Students covered under IDEA			Students not covered under IDEA		
	Total students	Number who participate in traditional extracurricular athletics	Percent of total who participate in traditional extracurricular athletics	Total students	Number who participate in traditional extracurricular athletics	Percent of total who participate in traditional extracurricular athletics
<b>Districts</b>						
District 1	13,908	x	x	68,352	x	x
District 2	341	33	10%	2,406	515	21%
District 3	1,626	47	3	12,755	701	5
District 4	2,600	x	x	16,494	x	x
District 5	856	36	4	5,602	376	7
District 6	4,609	263	6	44,529	9,686	22
District 7	38,339	x	x	307,119	x	x
District 8	7,058	x	x	32,423	x	x
District 9	569	36	6	3,751	588	16
District 10	4,171	x	x	26,214	x	x
<b>Schools</b>						
School A	120	30	25	1,386	838	60
School B	188	36	19	1,180	588	50

**Appendix II: Student Participation in Physical Education and Extracurricular Athletics in District and Schools We Visited**

	Students covered under IDEA			Students not covered under IDEA		
	Total students	Number who participate in traditional extracurricular athletics	Percent of total who participate in traditional extracurricular athletics	Total students	Number who participate in traditional extracurricular athletics	Percent of total who participate in traditional extracurricular athletics
School C	97	18	19	668	285	43
School D	41	7	17	433	317	73
School E	92	15	16	602	230	38
School F	166	25	15	689	175	25
School G	248	26	10	1,769	397	22
School H	83	6	7	499	144	29
School I	228	15	7	1,818	482	27
School J	110	7	6	793	177	22
School K	31	2	6	370	66	18
School L	327	x	x	1,325	x	x
School M	298	60	20	1,680	x	x
School N	159	x	x	1,524	x	x

Source: Participation estimates provided by district and school officials we interviewed.

Notes: Our questionnaire asked districts and schools specifically about “regular extracurricular interscholastic sports” to distinguish between sports that are designed specifically for students with disabilities.

Six elementary schools we interviewed did not offer formal extracurricular athletic programs and are not included in the table.

X means “don’t know” or no response was provided.

# Appendix III: National Data on Student Participation in Physical Education and Extracurricular Athletics

Unless otherwise noted, differences made between groups in these tables are not statistically significant at p-value less than 0.05.

**Table 5: Population Estimates: Number of Days per Week Students with and without Disabilities Attend PE Class**

	Students with physical disabilities or long-term health problems	Students without physical disabilities or long-term health problems
0 days	48%	47%
1 day	2	2
2 days	5	3
3 days	12	12
4 days	3	3
5 days	29	34

Source: GAO analysis of YRBS, 2005.

Note: Estimates may not add to 100 percent due to rounding.

**Table 6: Population Estimates: Number of Days per Week Girls and Boys with Disabilities Attend PE Class**

	Girls with physical disabilities or long-term health problems	Boys with physical disabilities or long-term health problems
0 days	54%	39%
1 day	1	2
2 days	6	4
3 days	12	12
4 days	2	5
5 days	24	37

Source: GAO analysis of YRBS, 2005.

Note: Estimates may not add to 100 percent due to rounding.

**Appendix III: National Data on Student Participation in Physical Education and Extracurricular Athletics**

**Table 7: Population Estimates: Number of Days per Week Girls with and without Disabilities Attend PE Class**

	<b>Girls with physical disabilities or long-term health problems</b>	<b>Girls without physical disabilities or long-term health problems</b>
0 days	54%	53%
1 day	1	1
2 days	6	3
3 days	12	11
4 days	2	2
5 days	24	30

Source: GAO analysis of YRBS, 2005.

Note: Estimates may not add to 100 percent due to rounding.

**Table 8: Population Estimates: Number of Days per Week Boys with and without Disabilities Attend PE Class**

	<b>Boys With Physical Disabilities or Long-Term Health Problems</b>	<b>Boys Without Physical Disabilities or Long-Term Health Problems</b>
0 days	39%	41%
1 day	2	2
2 days	4	3
3 days	12	13
4 days	5	4
5 days	37	37

Source: GAO analysis of YRBS, 2005.

Note: Estimates may not add to 100 percent due to rounding.

**Table 9: Population Estimates: Percentage of Students who Actually Played Sports or Exercised in a Typical PE Class**

	<b>Students with Physical Disabilities or Long-Term Health Problems</b>	<b>Students without Physical Disabilities or Long-Term Health Problems</b>
Less than 10 minutes	3%	3%
10 to 20 minutes	4	5
21 to 30 minutes	10	8
31 to 40 minutes	10	11
41 to 50 minutes	8	9
51 to 60 minutes	6	6
More than 60 minutes	10	12

Source: GAO analysis of YRBS, 2005.

**Appendix III: National Data on Student Participation in Physical Education and Extracurricular Athletics**

**Table 10: Population Estimates: Percentage of Girls and Boys with Disabilities who Actually Played Sports or Exercised in a Typical PE Class**

	<b>Girls with Physical Disabilities or Long-Term Health Problems</b>	<b>Boys with Physical Disabilities or Long-Term Health Problems</b>
Less than 10 minutes	3%	4%
10 to 20 minutes	5	4
21 to 30 minutes	10	10
31 to 40 minutes <sup>a</sup>	6	16
41 to 50 minutes	7	10
51 to 60 minutes	5	7
More than 60 minutes	9	12

Source: GAO analysis of YRBS, 2005.

<sup>a</sup>Differences between girls and boys with physical disabilities or long-term health problems are statistically significant at p-value less than 0.05.

**Table 11: Population Estimates: Percentage of Girls with and without Disabilities who Actually Played Sports or Exercised in a Typical PE Class**

	<b>Girls with physical disabilities or long-term health problems</b>	<b>Girls without physical disabilities or long-term health problems</b>
Less than 10 minutes	3%	3%
10 to 20 minutes	5	5
21 to 30 minutes	10	9
31 to 40 minutes	6	10
41 to 50 minutes	7	8
51 to 60 minutes	5	5
More than 60 minutes	9	8

Source: GAO analysis of YRBS, 2005.

**Appendix III: National Data on Student Participation in Physical Education and Extracurricular Athletics**

**Table 12: Population Estimates: Percentage of Boys with and without Disabilities who Actually Played Sports or Exercised in a Typical PE Class**

	<b>Boys with physical disabilities or long-term health problems</b>	<b>Boys without physical disabilities or long-term health problems</b>
Less than 10 minutes	4%	2%
10 to 20 minutes	4	5
21 to 30 minutes	10	8
31 to 40 minutes	16	11
41 to 50 minutes	10	11
51 to 60 minutes	7	8
More than 60 minutes	12	15

Source: GAO analysis of YRBS, 2005.

**Table 13: Population Estimates: Instructional Settings for Physical Education, Students with Disabilities in Grades 1 through 7 (Ages 6 to 12 at Outset of Study)**

	<b>Total students</b>	<b>Grades 1-5</b>	<b>Grades 6-7</b>
General education classroom <sup>a</sup>	92%	89%	96%
Resource room	4	6	1
Special education self-contained classroom	6	6	4

Source: GAO analysis of SEELS 2000, Wave 1.

Notes: Among students who received PE

Estimates may add up to more than 100 percent because some students may take PE in multiple settings.

<sup>a</sup>Differences between grades 1 through 5 and 6 through 8 are statistically significant at p-value less than 0.05.

**Table 14: Population Estimates: Instructional Settings for Physical Education, Students with Disabilities in Grades 7 through 12 (Ages 13 to 16 at Outset of Study)**

	<b>Total students</b>	<b>Grades 7-8</b>	<b>Grades 9-12</b>
General education classroom	88%	92%	84%
Special education self-contained classroom	13	8	16
Individual instruction	0	0	1
Community setting/ different school	1	0	1

Source: GAO analysis of NLTS2 2001, Wave 1.

Notes: Among students who received PE

Estimates may add up to more than 100 percent because some students may take PE in multiple settings.

**Appendix III: National Data on Student Participation in Physical Education and Extracurricular Athletics**

**Table 15: Population Estimates: Participated in a Sports Team, Students with Disabilities in Grades 1 through 7 (Ages 6 to 12 at Outset of Study)**

	Participated in a sports team	Did not participate in a sports team
<b>Total<sup>a</sup></b>	<b>41%</b>	<b>59%<sup>b</sup></b>
<b>Among Students who Participated in Extracurricular Activities<sup>c</sup></b>		
School activity only	53	47
Out-of-school activity only	53	47
Both school and out-of-school activity <sup>a</sup>	80	20

Source: GAO analysis of SEELS 2000, Wave 1.

Note: It is not possible to determine whether students who reported participating in a sports team and participating in both in-school and out-of-school extracurricular activities participated in a school-based sports team or a community-based sports team.

<sup>a</sup>Differences between students who participated in a sports team and did not participate in a sports team are statistically significant at p-value less than 0.05.

<sup>b</sup>This includes students who reported participation in no extracurricular activities, but were not asked the follow-up question about sports participation.

<sup>c</sup>To calculate the percentage of students with disabilities in these studies who did not participate in sports, we included students who reported not participating in any extracurricular activity, as well as students who reported participating in some extracurricular activity but not sports.

**Table 16: Population Estimates: Participated in a Sports Team, Students With Disabilities in Grades 7 through 12 (Ages 13 to 16 at Outset of Study)**

	Participated in a sports team	Did not participate in a sports team
<b>Total<sup>a</sup></b>	<b>33%</b>	<b>67%<sup>b</sup></b>
<b>Among Students who Participated in Extracurricular Activities<sup>c</sup></b>		
School activity only	53	47
Out-of-school activity only <sup>a</sup>	31	69
Both school and out-of-school activity <sup>a</sup>	62	38

Source: GAO analysis of NLTS2 2001, Wave 1.

Notes: It is not possible to determine whether students who reported participating in a sports team and participating in both in-school and out-of-school extracurricular activities belonged to a school-based sports team or a community-based sports team.

<sup>a</sup>Differences between students who participated in a sports team and did not participate in a sports team are statistically significant at p-value less than 0.05.

<sup>b</sup>This includes students who reported participation in no extracurricular activities, but were not asked the follow-up question about sports participation.

<sup>c</sup>To calculate the percentage of students with disabilities in these studies who did not participate in sports, we included students who reported not participating in any extracurricular activity, as well as students who reported participating in some extracurricular activity but not sports.

**Appendix III: National Data on Student Participation in Physical Education and Extracurricular Athletics**

**Table 17: Population Estimates: Participated in a Sports Team, Students with Disabilities in Grades 1 through 7 (Ages 6 to 12 at Outset of Study), By Gender**

	Girls	Boys
<b>Total<sup>a</sup></b>	<b>31%</b>	<b>45%<sup>b</sup></b>
<b>Among Students who Participated in Extracurricular Activities<sup>c</sup></b>		
School activity only <sup>a</sup>	40	62
Out-of-school activity only <sup>a</sup>	43	58
Both School and out-of-school activity <sup>a</sup>	67	85

Source: GAO analysis of SEELS 2000, Wave 1.

Note: It is not possible to determine whether students who reported participating in a sports team and participating in both in-school and out-of-school extracurricular activities belonged to a school-based sports team or a community-based sports team.

<sup>a</sup>Differences between students who participated in a sports team and did not participate in a sports team are statistically significant at p-value less than 0.05.

<sup>b</sup>This includes students who reported participation in no extracurricular activities, but were not asked the follow-up question about sports participation.

<sup>c</sup>To calculate the percentage of students with disabilities in these studies who did not participate in sports, we included students who reported not participating in any extracurricular activity, as well as students who reported participating in some extracurricular activity but not sports

**Table 18: Population Estimates: Participated In a Sports Team, Students With Disabilities in Grades 7 through 12 (Ages 13 to 16 at Outset of Study), by Gender**

	Girls	Boys
<b>Total<sup>a</sup></b>	<b>23%</b>	<b>37%<sup>b</sup></b>
<b>Among Students who Participated in Extracurricular Activities<sup>c</sup></b>		
School activity only <sup>a</sup>	38	58
Out-of-school activity only <sup>a</sup>	18	38
Both School and out-of-school activity <sup>a</sup>	47	69

Source: GAO analysis of NLTS2 2001, Wave 1.

Note: It is not possible to determine whether students who reported participating in a sports team and participating in both in-school and out-of-school extracurricular activities belonged to a school-based sports team or a community-based sports team.

<sup>a</sup>Differences between students who participated in a sports team and did not participate in a sports team are statistically significant at p-value less than 0.05.

<sup>b</sup>This includes students who reported participation in no extracurricular activities, but were not asked the follow-up question about sports participation.

<sup>c</sup>To calculate the percentage of students with disabilities in these studies who did not participate in sports, we included students who reported not participating in any extracurricular activity, as well as students who reported participating in some extracurricular activity but not sports

**Appendix III: National Data on Student Participation in Physical Education and Extracurricular Athletics**

**Table 19: Population Estimates: Participated in a Sports Team, Students with Disabilities in Grades 7 through 12 (Ages 13 to 16 at Outset of Study), by Disability Type**

	<b>Participated in a sports team</b>
Hearing impairment	47%
Speech impairment	41
Other health impairment <sup>a</sup>	36
Learning disability <sup>a</sup>	36
Deaf/blindness <sup>a</sup>	27
Traumatic brain injury <sup>a</sup>	27
Visual impairment <sup>a</sup>	25
Emotional disturbance <sup>a</sup>	24
Mental retardation <sup>a</sup>	22
Multiple disabilities <sup>a</sup>	21
Orthopedic impairment <sup>a</sup>	19
Autism <sup>a</sup>	16

Source: GAO analysis of NLTS2 2001, Wave 1.

Notes: These data do not fully distinguish if these athletic opportunities are offered through schools or community programs. It is not possible to determine whether students who reported participating in a sports team and participating in both in-school and out-of-school extracurricular activities belonged to a school-based sports team or a community-based sports team.

<sup>a</sup>Students with hearing impairments participate in sports teams at higher rates compared to students with these types of disabilities and these differences are statistically significant at p-value less than 0.05.

# Appendix IV: Comments from the Department of Education



UNITED STATES DEPARTMENT OF EDUCATION

WASHINGTON, DC 20202- \_\_\_\_\_

June 4, 2010

Ms. Cornelia M. Ashby  
Director  
Education, Workforce, and Income Security Issues  
U.S. Government Accountability Office  
441 G Street, N.W.  
Washington, D.C. 20548

Dear Ms. Ashby:

Thank you for the opportunity to review the draft Government Accountability Office (GAO) report: *Students with Disabilities: More Information and Guidance Could Improve Opportunities in Physical Education and Athletics* (GAO-10-519), and respond on behalf of the Department.

The draft report contains two recommendations for Executive Action, and we outline each recommendation and our responses below.

**Recommendation:** To help states and schools access existing knowledge and resources, we recommend that the Secretary of Education facilitate information sharing among states and schools on ways to provide opportunities in Physical Education (PE) and extracurricular athletics to students with disabilities. For instance, Education could provide website links to resources or practices used by states, districts, schools, or organizations in PE or extracurricular athletics for students with disabilities. Such information could be posted on its website or discussed at conferences or webinars.

**Response:** The Department generally agrees with the recommendation, and agrees that further information sharing on providing opportunities in PE and extracurricular athletics to students with disabilities would be helpful to states, schools, and the students. The Department's Office of Special Education and Rehabilitative Services, through the Office of Special Education Programs, working in conjunction with other offices in the Department, will identify useful information on this subject and share that information by posting it on the Department's ed.gov Web site. This information may also be discussed by Department personnel at conferences or in webinars.

**Recommendation:** To ensure that schools are aware of their responsibilities and that students with disabilities consistently have opportunities to participate in extracurricular athletics equal to those of other students, we recommend that Education clarify and communicate schools' responsibilities under Section 504 of the Rehabilitation Act regarding the provision of extracurricular athletics. For example, Education could provide clarifying guidance to schools through its website or at conferences.

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**Appendix IV: Comments from the Department  
of Education**

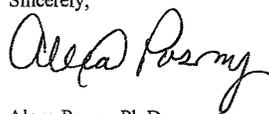
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Page 2 -- Ms. Cornelia M. Ashby

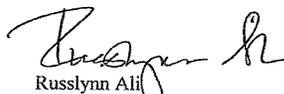
**Response:** The Department agrees that it is important for schools to be aware of their responsibilities and that students with disabilities have opportunities to participate in extracurricular athletics equal to those of other students. In fiscal year 2011, the Department's Office for Civil Rights intends to issue additional guidance on Section 504 of the Rehabilitation Act and recipients' obligations to provide students with disabilities equal access to extracurricular athletics.

The Department will also provide some technical comments on the report. We appreciate the opportunity to comment on these important matters.

Sincerely,



Alexa Posny, Ph.D.  
Assistant Secretary for the  
Office of Special Education and Rehabilitative Services



Russlynn Ali  
Assistant Secretary for Civil Rights

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# Appendix V: GAO Contact and Staff Acknowledgments

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## GAO Contact

Cornelia Ashby, (202) 512-7215 or [ashbyc@gao.gov](mailto:ashbyc@gao.gov)

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## Staff Acknowledgments

In addition to the contact above, Elizabeth Morrison (Assistant Director), Theresa Lo (analyst-in-charge), Hedieh Rahmanou Fusfield, and Michael Pahr made significant contributions to this report. Steven Putansu, Dae Park, and Shana Wallace assisted with the data analysis and methodology. Alexander Galuten provided legal support. James Bennett assisted with graphics. Susannah Compton and Jessica Orr assisted in report development.

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