

TITLE IX GUIDANCE FOR MIDDLE SCHOOL ATHLETICS

This document is an educational reference guide. It does not constitute legal advice. Member schools should consult their school district's Title IX Coordinator and legal counsel for school-specific compliance questions.

WHAT IS TITLE IX?

Title IX of the Education Amendments of 1972 is a federal civil rights law that prohibits discrimination based on sex in any education program or activity receiving federal financial assistance. This includes middle school interscholastic athletics. Title IX applies to public schools and most private schools that receive any form of federal funding. Every NFMSS member school that receives federal funds must comply with Title IX in all aspects of its athletic program — not just participation opportunities, but also equipment, facilities, scheduling, coaching, tutoring, travel, and more.

SECTION 1 — THE THREE-PART TEST FOR ATHLETIC EQUITY

Courts and the U.S. Department of Education use a three-part test to evaluate whether a school is meeting Title IX's participation requirement. Schools must satisfy AT LEAST ONE of the three parts:

Part 1 — Proportionality	<p>The school provides athletic participation opportunities for male and female students in numbers substantially proportionate to their respective enrollments.</p> <p>Example: If 52% of students are female, approximately 52% of athletic slots should be for female athletes.</p>
Part 2 — History of Expansion	<p>The school has a history and continuing practice of program expansion that is demonstrably responsive to the developing interests and abilities of the underrepresented sex.</p> <p>Example: The school has added girls' teams or opportunities in recent years and continues to do so.</p>
Part 3 — Full Accommodation	<p>The school is fully and effectively accommodating the interests and abilities of the underrepresented sex, even if numbers are not proportionate.</p> <p>Example: There is no unmet demand for athletic opportunities among the underrepresented sex.</p>

SECTION 2 — THE 13 PROGRAM AREAS OF ATHLETIC EQUITY

Title IX requires equal treatment across all 13 program areas. Athletic Directors should conduct an annual self-assessment of each area.

Program Area	Equity Requirement	Self-Assessment
--------------	--------------------	-----------------

TITLE IX GUIDANCE FOR MIDDLE SCHOOL ATHLETICS

1. Equipment & Supplies	Quality, availability, and maintenance must be equivalent for male and female programs.	<input type="checkbox"/> Equitable <input type="checkbox"/> Needs Review
2. Scheduling of Games & Practice Times	Equitable access to prime-time practice slots and game scheduling for all genders.	<input type="checkbox"/> Equitable <input type="checkbox"/> Needs Review
3. Travel & Per Diem Allowances	Transportation, lodging, and meal allowances must be comparable across programs.	<input type="checkbox"/> Equitable <input type="checkbox"/> Needs Review
4. Opportunity to Receive Coaching	Quality and quantity of coaching — including number of coaches and qualifications — must be equitable.	<input type="checkbox"/> Equitable <input type="checkbox"/> Needs Review
5. Opportunity to Receive Academic Tutoring	Equal access to tutoring services and academic support for student athletes of all genders.	<input type="checkbox"/> Equitable <input type="checkbox"/> Needs Review
6. Assignment & Compensation of Coaches	Pay, benefits, and working conditions of coaches must be equitable, regardless of the sport or gender served.	<input type="checkbox"/> Equitable <input type="checkbox"/> Needs Review
7. Provision of Locker Rooms & Practice Facilities	Quality, exclusivity, and maintenance of locker rooms and facilities must be equivalent.	<input type="checkbox"/> Equitable <input type="checkbox"/> Needs Review
8. Provision of Medical & Training Facilities	Equal access to athletic trainers, medical equipment, and training room services.	<input type="checkbox"/> Equitable <input type="checkbox"/> Needs Review
9. Provision of Housing & Dining Facilities	If applicable, housing and dining provided to athletes must be equitable (typically relevant for away travel).	<input type="checkbox"/> Equitable <input type="checkbox"/> Needs Review
10. Publicity	Media coverage, promotional materials, website features, and social media coverage must be comparable.	<input type="checkbox"/> Equitable <input type="checkbox"/> Needs Review
11. Support Services	Administrative support, office space, and clerical assistance must be provided equitably.	<input type="checkbox"/> Equitable <input type="checkbox"/> Needs Review
12. Recruitment	If the school engages in any recruiting, opportunities must be equal across genders.	<input type="checkbox"/> Equitable <input type="checkbox"/> Needs Review
13. Athletic Financial Assistance	Where scholarships or financial aid are awarded, distribution must be proportionate.	<input type="checkbox"/> Equitable <input type="checkbox"/> Needs Review

SECTION 3 — SEXUAL HARASSMENT & HOSTILE ENVIRONMENT

TITLE IX GUIDANCE FOR MIDDLE SCHOOL ATHLETICS

Public Policy | NFMSS Member School Reference & Compliance Guide

Title IX also prohibits sexual harassment in athletic programs, including: unwelcome sexual advances, requests for sexual favors, sexual violence, gender-based bullying or hazing, and any conduct that creates a hostile environment based on sex. Member schools must have a written Title IX policy, a designated Title IX Coordinator, a grievance procedure, and a process for responding to complaints. Athletic Directors are mandatory reporters under Title IX — any known or suspected sexual harassment involving student athletes must be reported to the school's Title IX Coordinator immediately.

SECTION 4 — HOW TO FILE A TITLE IX COMPLAINT

Internal Complaint	Contact your school's Title IX Coordinator. Every school receiving federal funds must have one. The coordinator's name and contact information must be publicly posted.
District Complaint	File a complaint with the school district's Title IX office if the school-level process is not adequate.
State Complaint	Contact your state's Department of Education civil rights division for escalated complaints.
Federal Complaint	File a complaint with the U.S. Department of Education's Office for Civil Rights (OCR) at ocr@ed.gov or 1-800-421-3481. Complaints must be filed within 180 days of the discriminatory act.
NFMSS Notification	Notify NFMSS at compliance@nfms.org of any Title IX complaint involving an NFMSS-affiliated program so we can provide appropriate support and monitor member school compliance.

SECTION 5 — ATHLETIC DIRECTOR ANNUAL CHECKLIST

- Confirm the school has a designated Title IX Coordinator whose name is publicly posted.
- Conduct an annual equity audit across all 13 program areas listed in Section 2.
- Review participation data — compare male vs. female participation rates against enrollment.
- Ensure locker rooms, practice facilities, and medical facilities are equitably maintained.
- Confirm coaching staff compensation is being reviewed for gender equity by HR/administration.
- Verify that scheduling of practices and games provides equitable prime-time access.
- Review all athletic publicity and social media for equitable coverage across all sports.
- Confirm all coaching staff and volunteers have received Title IX awareness training.
- Ensure students and parents know how to file a Title IX complaint.
- Document all equity reviews and retain records for a minimum of three years.

TITLE IX GUIDANCE FOR MIDDLE SCHOOL ATHLETICS

Public Policy | NFMSS Member School Reference & Compliance Guide

Athletic Director Signature:	_____	Date of Annual Review:	_____
Printed Name:	_____	School:	_____
Principal Signature:	_____	School Year:	_____