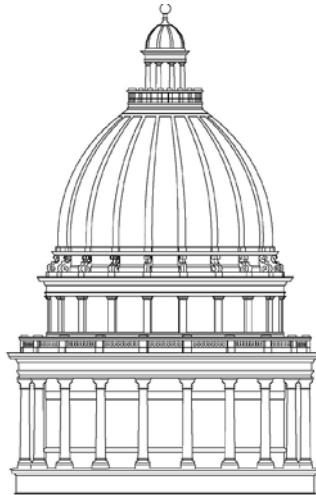


REPORT TO THE
UTAH LEGISLATURE

Number 2014-01



**A Performance Audit
Of the Utah High School
Activities Association (UHSAA)**

February 2014

Office of the
LEGISLATIVE AUDITOR GENERAL
State of Utah



STATE OF UTAH

Office of the Legislative Auditor General

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AUDITOR GENERAL

February 04, 2014

TO: THE UTAH STATE LEGISLATURE

Transmitted herewith is our report, A Performance Audit of Utah High School Activities Association (UHSAA) (Report #2014-01). A digest is found on the blue page located at the front of the report. The audit scope and objectives are explained at the close of the Introduction.

We will be happy to meet with appropriate legislative committees, individual legislators, and other state officials to discuss any item contained in the report in order to facilitate the implementation of the recommendations.

Sincerely,

A handwritten signature in black ink that reads "John M. Schaff". The signature is stylized and cursive.

John M. Schaff, CIA
Auditor General

JMS/lm

Digest of A Performance Audit of the Utah High School Activities Association (UHSAA)

The Utah High School Activities Association (UHSAA) administers and supervises interscholastic activities for 136 Utah member high schools. UHSAA oversees 20 different sports as well as music, speech/debate, and theater for its member high schools. Football has 103 schools that participate in the sport. UHSAA oversees many activities and programs concerning high school sports and activities. This report will focus on two areas:

- Classification/realignment of interscholastic activities, with a focus on football
- Eligibility for the transfer of athletic students from one high school to another

In 2010, UHSAA board of trustees shortened the classification process time frame from every four years to every two years. The association's oversight also includes the operation of all UHSAA state tournaments, the sportsmanship program, registering and assigning of officials, as well as other programs.

UHSAA's Classification Realignment Policy Can Be Improved. UHSAA's formalized policies do not include procedures for classifying high schools and realigning regions. UHSAA's current policy handbook is vague and lacks details concerning the overall classification process. We believe formalized UHSAA policies should be updated to include classification and realignment procedures as well as define the process schools should follow to petition their classification and/or region placement.

Creation of Six Football Classifications Has Increased Costs. UHSAA's board of trustees' decision to add a sixth classification level for football, while leaving all other sports or activities with five classifications, resulted in tradeoffs most significant for high schools that were previously in 3A, 2A, and 1A classifications. With the addition of the new 3AA classification, region travel costs and times increased for all schools in the 3AA classification as well as for most schools in the 3A classification. Overall region travel costs for 3AA

Chapter I: Introduction

Chapter II: UHSAA Classification Changes Have Tradeoffs

Chapter III: Student Transfer Process Can Be Improved

schools will increase by \$57,180 and region travel times will increase by 72 percent for the 2013-2015 football seasons compared to the 2011-2013 football seasons. If UHSAA's board of trustees decides to increase all interscholastic activities to six classifications, region travel time and costs will increase for most high schools.

Eligibility Application Process Can Be Enhanced. UHSAA's student eligibility application process obtains information required by policy, but could be more complete and efficient. UHSAA plans to have an online system operational early in 2014 so applications can be submitted electronically. This change should both improve application accuracy and reduce processing time. However, even after the system is operational, UHSAA staff should ensure that submitted applications have all required information.

Transfer Appeal Hearings Can Be Improved. Our observations and discussions indicate that appeals hearings appear impartial but can provide more clarity and uniformity by expanding policy. Suggested improvements include:

- Providing the student/parent with the reason why the application was denied
- Documenting necessary appeal rulings and membership
- Closing appeal hearings that discuss protected student information unless previously authorized

Additional policies providing information to parents on the reason(s) for the hearing, documenting hearing findings, and better protecting student information will increase hearing consistency and may eliminate the need for some future appeal hearings.

REPORT TO THE UTAH LEGISLATURE

Report No. 2014-01

A Performance Audit of the Utah High School Activities Association (UHSAA)

February 2014

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Table of Contents

	Page
Digest.....	- i -
Chapter I	
Introduction.....	-1-
UHSAA Administers Utah High School Interscholastic Activities.....	-1-
Audit Scope and Objectives.....	-4-
Chapter II	
UHSAA Classification Changes Have Tradeoffs.....	-5-
UHSAA’s Classification Realignment Policy Can Be Improved.....	-6-
Creation of Six Classifications Has Increased Costs.....	-14-
Recommendations.....	-19-
Chapter III	
Student Transfer Process Can Be Improved.....	-21-
Application Process Can Be Enhanced.....	-21-
Transfer Appeal Hearings Can Be Improved.....	-27-
Recommendations.....	-31-
Appendices.....	-33-
Agency Response.....	-49-

Chapter I

Introduction

The Utah High School Activities Association (UHSAA) administers and supervises interscholastic activities for 136 Utah member high schools. UHSAA oversees 20 different sports as well as music, speech/debate, and theater for its member high schools. While UHSAA oversees many activities and programs concerning high school sports and activities, this report will focus on two areas:

- Classification/realignment of interscholastic activities with a focus on football
- Eligibility for the transfer of athletic students from one high school to another

In 2010, UHSAA shortened its classification process time frame from every four years to every two years. In addition to setting classifications and regions, the association's oversight also includes the operation of all UHSAA state tournaments, the sportsmanship program, registering and assigning of officials, as well as other programs.

UHSAA Administers Utah High School Interscholastic Activities

UHSAA has administered interscholastic activities for Utah high schools since 1927 and is aided by its mission statement, constitution, by-laws, and policies and procedures. The policies and procedures are reviewed regularly and updated when required. UHSAA's purpose is found in *Utah Administrative Rule R277-605.1*, which states that "...UHSAA is an organization whose purpose is to administer and supervise interscholastic activities among its member schools according to the Association constitution and by-laws."

UHSAA Organizational Structure

UHSAA's leadership consists of a 30-member board of trustees that represents all regions of the state. The board of trustees is responsible to:

UHSAA administers over twenty sports and activities for all its member schools.

UHSAA's board of trustees consists of 30 members.

- Set policy and give direction for the operation of the association, including the creation of committees, panels, or any other subdivision of the board as is deemed necessary for the best interest of the association
- Appoint the executive director of the association
- Approve an annual budget
- Take action on proposed amendments to the association's constitution and by-laws in accordance with Article 4 of the UHSAA constitution
- Prepare and approve, for the purposes of fair and prudent competition in the activities sponsored by the association, a statewide classification of schools and region alignment in those classifications
- Provide notice of all material actions to association members

The executive director answers directly to the board of trustees and carries out policy and procedures passed by the board. The executive director also oversees the day-to-day operations of the association and has a staff of nine employees. The executive director is charged to:

- Faithfully carry into execution the by-laws, rules, and regulations of the association
- Take such action as is consistent with the best interests of the association
- Prepare the annual budget
- Receive and deposit all funds belonging to the association
- Appoint all staff members, subject to the approval of the board of trustees
- Assign and direct the work of the office staff
- Maintain complete and current records of the assets of the association
- Interpret the constitution and by-laws

UHSAA also has a 23-member executive committee. It is possible for an executive committee member to serve concurrently as a board

The executive director of UHSAA executes policy set by UHSAA's board of trustees.

of trustee member. The executive committee has the following authority and duties:

- Assist the executive director of the association in administering the policies and directives of the board of trustees, including the function of enforcing the rules and regulations of the association
- Appoint such committees to assist in that administration as may be reasonable
- Appoint to the board of trustees one high school principal representing each existing high school classification

In the course of this audit we contacted seven western states concerning the makeup of their organizations and found that Utah's UHSAA organizational structures and activities are very similar to those of other states.

UHSAA Board of Trustees Assigns Member Schools to the Regions

UHSAA board of trustees is responsible for placing member high schools in classifications and regions based on factors determined by the board of trustees. Once schools' classifications are determined, the board of trustees attempts to create regions with the same number of schools that are close in proximity to one another. Having regions with the same number of schools makes it easier to create schedules and include bye weeks.

Member schools schedule non-region games and season region games. High schools are allowed to have one additional football (basketball is also allowed) game for their varsity teams, called an endowment game, at the beginning of the season. Half of the net revenues from this endowment game go to the UHSAA foundation. It should be noted that member schools are not allowed to participate with any school that is not a member of a state association without prior approval from the board of trustees.

The UHSAA board of trustees is responsible for the classification of high school sports and activities.

Audit Scope and Objectives

We were asked to audit how UHSAA determines the classification of high schools. We also reviewed the UHSAA student transfer application process and appeal hearings. In 2005, our office conducted an audit on the transfer of students and wanted to follow up to determine if any changes were needed to the current processes.

The audit request asked that we review the following areas:

- Determine costs incurred from changing from five to six classifications for football (Chapter II)
- Examine the process used to determine the classifications and regions for interscholastic activities (Chapter II)
- Review the student transfer process for interscholastic activities (Chapter III)
- Review the appeals hearings process conducted by UHSAA for student transfer determinations (Chapter III)

Chapter II

UHSAA Classification Changes Have Tradeoffs

The classification and alignment of Utah High School Activities Association (UHSAA) member schools affect schools and their surrounding communities. UHSAA's classification policy can be improved by implementing realignment criteria that should be followed each time the UHSAA board of trustees goes through the realignment process. UHSAA's current realignment period matches that of most other western states, which also realign their high school sports every two years.

UHSAA board of trustee's decision to add a sixth classification for football while leaving all other sports or activities at five classifications resulted in significant tradeoffs for high schools that were previously in 3A, 2A, and 1A classifications. While competition should be improved with the addition of this new 3AA classification, travel costs and times for region games increased for all schools now classified 3AA as well as most of the 3A schools. Overall travel costs for region play for 3AA schools will increase by 93 percent and travel time will increase by 72 percent for the 2013-2015 football seasons when compared to the 2011-2013 football seasons. If UHSAA board of trustees decides to increase to six classifications for all interscholastic activities, travel time and costs for region games will increase for most high schools.

The UHSAA's board of trustees' actions concerning classification have always been closely followed by the public but, since 2010, two actions taken to improve the level of competition have increased awareness of the system.

- First, in 2010, the change from a four-year to a two-year realignment process was made to accommodate changing populations.
- Second, the change in football play from six rather than five classifications further increased movement not only within classifications but also within regions.

Travel costs and times for region games have increased for all schools in the 3AA classification.

Travel costs and times for region games have decreased for 16 of the 21 schools in 2A and 1A classifications.

UHSAA sport and activity classifications are adjusted every two years.

UHSAA's Classification Realignment Policy Can Be Improved

UHSAA's formalized policies do not include procedures for classifying high schools and realigning regions. UHSAA's current policy handbook is vague and lacks details concerning the overall classification process. The UHSAA board of trustees conducts a series of public hearings and meetings before the classifications and regions are finalized (see Appendix A). We believe formalized UHSAA policies should be updated to include classification and realignment procedures as well as define the process schools should follow to petition their classification and/or region placement. This change could eliminate or reduce many of the concerns prompting this review.

An example of failing to update policies can be seen in the UHSAA board of trustees' 2010 change from reclassifying high school sports and activities every four years to every two years. The overall tradeoff of this change is that the classifications better represent student enrollment counts if the reclassifications of schools are done more often. However, better policy development could serve to explain the reasons for the change.

We also reviewed UHSAA's fees and use of those fees. All schools that are members of the UHSAA are assessed fees by the organization. Fees charged to member schools seem appropriate when compared to other states' fees.

Criteria for Classification and Realignment Needs to Be Included in Policy

UHSAA needs formalized policies and procedures that provide direction and guidelines for the realignment and classification of high school sports and activities. In addition, UHSAA policies need to include guidance on how schools can petition their placement in a classification and/or region.

UHSAA Needs to Provide More Detail to Its Classification Policy. UHSAA's formalized policies do not provide sufficient detail concerning the overall goals of classification, or how a school's placement will be determined for divisional classification and regional alignment. Other western states' policies and procedures specify

UHSAA needs to better document its policies concerning the classification of schools.

criteria as to how classification is to be determined. For example, Idaho's policy states that primary classifications are based on enrollment but the final determination may also consider:

- Minimizing loss of instructional time
- Reducing travel time and distances
- Facilitating equitable scheduling
- Evaluating safety concerns relative to competitive scheduling and pairing

UHSAA's director said the board of trustees' classification goals are similar to those stated by Idaho. At the September 2013 realignment committee meeting, the first meeting to discuss realignment for the 2015-2017 school years, the committee did discuss philosophies or goals that they should work toward during the alignment process. The realignment committee reviews trends in student enrollment and the number of schools involved in the upcoming realignment. The committee also reviews the format and procedures for realignment and makes recommendations. In addition, the realignment committee determines the criteria to follow in order to place schools in classifications. The recommendations are then reviewed by the executive committee and forwarded to the board of trustees. The board of trustees can adopt or make changes to the recommendations.

Oregon policy provides another example of clear policy, which is set before their realignment committee meets. Their policy states that the realignment committee must consider:

- Safety of student participants and spectators, parents, and other spectators
- Minimizing loss of student instructional time
- Minimizing the expenditure of school district, student, and parent participant funds
- School enrollment data

Oregon's policy then states that, after these considerations, the realignment committee may also consider the following criteria, in addition to any others they deem relevant:

- School preference, including "play up/play down" requests

Other states use documented policies when determining classification for schools.

- Creation of similarly sized leagues
- Placement of schools within the same school district and classification in the same league
- Scheduling problems
- Athletic district history
- Minimization of changes

Including formalized policy concerning the overall process of classification and region alignment will provide UHSAA's board of trustee's decisions with additional transparency by showing interested parties exactly how the process works. As we found in other states, the most critical criteria is in their policies for their alignment committees to follow. UHSAA's realignment committee could add additional criteria or provide reasons why the provided criteria stated in policy should not be followed as part of their recommendations.

It will help the realignment committee as well as the board of trustees ensure that the end results comply with the stated criteria. In addition, clarifying classification policies will help to ensure that the ongoing process is consistently followed.

Policy Is Needed to Provide Detail to the Reclassification Petition Process. UHSAA needs to include in its policies provisions that formalize a process for schools to petition their placement in a classification or region. The UHSAA director said that under the current alignment process, member high schools have a voice in the process of where they are placed but it is the Board of Trustees who ultimately decides where schools are placed in the classifications and regions. However, this allowance process and its procedure are not addressed in UHSAA's policies. We reviewed policies from other states that allow their schools to petition to move up or down in a classification and found that their policies provide:

- Guidelines on grounds for a petition
- The allowable time period for a submitting a petition
- Information required to be submitted with the petition
- Designation of who rules on the petition

States that we contacted have polices that allow a school to petition their board of trustees or a board that is similar. As examples, Idaho, Oregon and Montana have polices that allow schools to petition to move up or down a classification while New Mexico only allows a

Documentation of the school classification petition process can be improved.

school to petition to move up in a classification. Adding policy guidance for a petition process for classification and realignment will provide better oversight as well as needed transparency.

Six Classifications for Football Were Created to Reduce Overall Enrollment Differences. Since changing to a two-year process for reclassification, the board of trustees has been tasked to keep the enrollment ratio between the largest and smallest school within a classification no larger than two for football only. This means that the enrollment of the largest school in a classification will not be more than twice that of the smallest school. UHSAA cites football participant safety and improved competitiveness as the reason for this change. All other sports and activities have five or fewer classifications, some of which have a ratio larger than two. Oregon uses a similar ratio as well. Figure 2.1 shows that expanding to six classifications in Utah decreased the ranges between the largest and smallest schools. UHSAA calculated these ratios but they do not represent subsequent modifications that were done to the classifications.

Six classifications exist for football only. All other sports or activities are placed in five or fewer classifications.

Figure 2.1 For 3AA and Below, the Range Between the Largest and Smallest Schools for 2013-2015 Realignment Was Reduced for Football. Six classifications were created for football only for 2013-2015 to reduce the size difference between the largest and smallest schools in classifications 3AA and below.

High School Classifications	Number of Schools	2013-2015 Student Ratio	Number of Schools	2011-2013 Student Ratio
5A	26	1.55	24	1.61
4A	28	1.43	26	1.42
3AA*	16	1.89	NA*	NA
3A	12	1.69	26	2.40
2A***	12	1.92	16	2.53
1A***	9	1.72	10	1.96

Source: Data provided by UHSAA

* This classification was created for the 2013–2015 school years.

** Not Applicable

*** The ratio for 2A & 1A schools only includes those who play football.

To determine their initial classifications, UHSAA uses enrollment data that schools are required to submit to the Utah State Office of Education on the first of October each year. The UHSAA director said that 5A and 4A classifications are based on enrollment data for

For football, UHSAA board of trustees' goal is to keep the ratio between the largest and smallest schools in each classification below two.

grades 11 and 12. The board of trustees decided that by eleventh grade, students do not seem to be as mobile, so these grades better reflect the student population. For schools below 4A, the classifications use grades 10 through 12.

Once schools have been placed in a classification, any school whose enrollment is plus or minus 3 percent of the school with the highest enrollment in each classification is considered a bubble school. Bubble schools are allowed to provide their input to the board of trustees about which classification they prefer to be placed in. (Appendices B and C show the previous breakdown of schools into six classifications for football and five for all other sports.) The director told us that the board of trustees is more cautious about granting a request to move a school down in classification rather than staying the same or going up one classification.

After classifications have been determined and the bubble schools placed in their classifications, the UHSAA board of trustees place schools in regions. While UHSAA board of trustees try to create regions where schools are geographically close to one another, they do not calculate the estimated cost or time of travel when aligning the regions. Appendices D, E, F, and G provide estimates for the changes in the regional alignment for 2013-2015. UHSAA staff agreed that cost and travel time information would be useful and they would consider it in future realignments. Having such information available would assist their decision making when assigning schools to regions.

Another change that occurred for the 2013-2015 classification realignment process was using a range for the number of schools in each classification rather than requiring a certain number of schools for each classification. For example, the committee proposed that for football there should be between at least 8 schools in 1A, 12-16 schools in 2A, 12-16 schools in 3A, 14-20 schools in 3AA, 26-32 schools in 4A, and 24-28 schools in 5A. This change has been viewed positively, as it allowed more flexibility when determining the placement of schools in each classification.

Two-Year, Enrollment-Based Reclassifications Are the Most Used

In 2010, UHSAA's board of trustees changed the frequency of reclassifying high school sports and activities from every four years to

every two years. The reasons for this change to a two-year cycle include:

- Addressing growth in the number of charter schools
- Addressing open enrollment
- Better representing school enrollment changes

Under the four-year system, the enrollment numbers used to determine classifications were 69 months old by the time the process was to be done again. This time span was due to the fact that UHSAA started the reclassification process two years before classifications were implemented, so by the time the four years elapsed, the enrollment data was more than five-and-a-half years old.

Figure 2.2 shows that Utah’s two-year realignment mirrors the systems of other western states. Oregon and Nevada were the only states that realign their schools every four years. In fact, New Mexico used to realign every two years but switched to a four-year process, which they tried once, then went back to the two-year process.

Figure 2.2 UHSAA’s Two-Year Realignment Process Is Similar to Other States’ Processes. Utah’s change from four years to two years for realignment of sports and activities is the same time span used in the majority of contacted western states.

States	Number of Years
Utah	2
Montana	2
Idaho	2
Wyoming	2
Oregon	4
New Mexico	2
Nevada	4
Arizona	2

Source: Auditor Analysis

Other states told us that whether they used a two- or a four-year process, there were people who were happy with it and those who would prefer something different. This attitude is similar to what we found in Utah. While there are people who are in favor of both the two-year realignment and the four-year realignment, most believe the two-year better reflects student enrollment at the schools.

In 2010, the UHSAA board of trustees changed the frequency of the realignment process from every four years to every two years.

Most surrounding states realign their sports every two years.

By changing to a two-year realignment process, the enrollment numbers used to determine classification are only 33 months old when the next process begins. The process was changed to use more current enrollment data the year before the realignment takes place. This allows the realignment process to better reflect the actual enrollment at each school. Two-year realignment is widely accepted by the surrounding states as they too work toward addressing changing enrollment growth and redistribution.

UHSAA Tries to Maintain Balance on Its Realignment Committees. UHSAA's board of trustees realigns each member high school to a classification and region every two years. The board of trustees assigns a committee to review established policies and make recommendations concerning the realignment process. This committee reviews trends and school sizes to help them form school classification recommendations that they provide to the executive committee, which reviews the recommendations and may possibly revise them. The recommendations are then forwarded to the board of trustees. The realignment committee consists of the following people:

- A chairperson
- One board of trustee member from each of the five classifications
- One executive committee member from each of the five classifications
- One athletic director
- UHSAA executive staff (non-voting)

The realignment committee members who are from the board of trustees and the executive committee represent all the classifications. This composition ensures that all sizes of schools are represented on the realignment committee. Once the committee creates and submits recommendations, the realignment committee is disbanded.

Only Enrollment Numbers Are Used when Determining Initial Classification; UHSAA May Want to Consider Additional Criteria. The realignment committee uses October enrollment data submitted to the Utah State Office of Education the previous year as the basis for realignment. Enrollment numbers are used initially to separate schools into classifications. This process is consistent with classification systems of other states. The greatest deviation between Utah and other states is the frequency of collecting enrollment data.

Student enrollment numbers are the basis of classifications.

Some states collect enrollment numbers more than once a year and then average them for the overall count. UHSAA board of trustees could consider following other states and calculate an average for their enrollment numbers.

Fees Charged for Membership Appear to Be Appropriate

The membership fees UHSAA charges Utah high schools seem reasonable. The fees help pay for the expenses incurred for running UHSAA. As was mentioned in Chapter 1, UHSAA staff is comprised of only nine employees and governed by a volunteer board of trustees, who are only reimbursed for expenses.

UHSAA’s Fees Are Comparable to Fees in Other States.

Utah’s fees seem reasonable when comparing UHSAA’s fees to similar high school associations in other states. Figure 2.3 shows the amounts charged by some western states for their membership dues and activities fees. Some states only charge an annual fee and the amount of fee is based on the size of the school. Utah charged \$500 for an annual fee but reduced it in 2010 to \$250 for each school.

Membership fees charged to schools are similar to those in other states.

Figure 2.3 UHSAA’s Fees Seem Reasonable When Compared to Other States’ Fees. Some states may only charge an annual membership fee to their schools while others charge an annual fee as well as a participation fee for each activity.

States	Annual Fee	Fee per Activity
Utah	\$250	\$40
Montana	0	250
Idaho	250	25
Wyoming	1,100–1,300	60
Oregon	750	75
New Mexico	1,000–5,000	0
Nevada*	850 and up	0
Arizona	2,129	204

Source: Auditor Analysis

**Nevada also charges \$1.50 per student*

According to UHSAA’s policy manual, “...dues shall be paid from monies that are not state-appropriated funds.” Most of the schools we talked with use revenues from gate receipts at their sports events or student fees to pay their UHSAA membership fees.

The Bulk of UHSAA Revenues Comes from State Tournaments. According to the UHSAA director, only 5 percent of their revenues comes from fees charged to high schools. Figure 2.4 shows that the bulk of UHSAA’s revenues come from UHSAA high school state tournaments. UHSAA collects revenues from these events and then reimburses the hosting schools their expenses.

Figure 2.4 UHSAA’s Revenue Primarily Come from UHSAA Operated State Tournaments. In recent years, UHSAA has been able to lower fees charged to schools because of increased revenues coming from UHSAA state tournaments and corporate sponsors.

Revenues	Percentage of Revenues
Tournament Games	80 %
Corporate Sponsors	15
High School Fees	5
Total	100 %

Source: UHSAA

For example, UHSAA also reimburses schools that travel for UHSAA state tournament games \$2.00 per mile for their mileage going one way as well as \$135 per game. UHSAA tries to zero out its budget each year. Any excess money from year to year goes into a UHSAA reserve fund. This fund is used to help reduce costs. Some reserved funds are used to help reduce participation costs for high schools. UHSAA has also increased the amount that it pays toward catastrophic insurance premiums on behalf of the schools, which in turn has reduced the amount that schools have to pay for their portion of the catastrophic insurance. The director said that member schools pay approximately 20 percent of the catastrophic insurance premium while the UHSAA foundation and UHSAA budget pay the remainder of the premium.

UHSAA receives most of its revenue from UHSAA state tournaments.

Creation of Six Classifications Has Increased Costs

For the 2013-2015 realignment, the UHSAA board of trustees changed the number of classifications for football from five to six. Expanding to six classifications has increased travel costs for affected high schools as well as reduced student time spent in the classroom, which may affect their education.

Increasing to six classifications reduced the number of schools that could be assigned to a classification. Reducing the number of schools in each classification resulted in increased travel costs and travel time for region games for the newly created 3AA and 3A classifications, while slightly decreasing travel time and costs for almost all schools in the 2A and 1A classifications for region games.

Creating six classifications for all sports and activities would be far more costly for Utah high schools. UHSAA was able to increase to six classifications for football because teams play each other only once a year, unlike other sports which play their opponents multiple times in a season. Additionally, expanding all sports and activities to six classifications would complicate aligning regions as smaller schools participate in fewer sports or activities.

Costs Have Been Affected by the Decrease In the Number of Schools in Each Classification

Expanding to six classifications for football has reduced student time spent in the classroom for affected high schools. With fewer schools in the classifications, travel times have increased for high schools in the 3AA and most of the schools in 3A. Figure 2.5 shows the result of adding an additional classification. We compared travel cost and travel time for the region games for the 2011-2013 time period against the 2013-2015 region alignment.

Figure 2.5 Comparison of the 2011-2013 Regional Travel of 3AA-1A Classifications to the New 2013-2015 Regional Travel. For 3AA and most 3A high schools, the estimated cost of travel and travel times increased for region games with the new classifications that were created by the UHSAA. High schools in the 2A and 1A classifications benefited from the realignment.

Classifications	Change in Total Travel Costs	Change in Total Travel Miles	Change in Total Travel Time
3AA	\$57,180	93%	72%
3A	11,339	13	9
2A	(19,370)	(10)	(13)
1A	(13,518)	(12)	(13)

Source: Auditor Analysis for Varsity and JV football regional travel

According to *Utah Administrative Rule* R277-605.3(c) “High school competitive sports programs shall be supplementary to the high school curriculum.” High schools are first placed in a classification and

Travel costs and times have increased for region games for all schools in 3AA and for most 3A schools.

Creating an additional classification reduces the number of schools for 3AA, 3A, 2A, and 1A classifications.

then they are put in a region. When determining the regions, by which high schools are placed, the UHSAA board of trustees needs to control travel whenever possible to reduce the amount of time students are away from the classroom. UHSAA's mission statement states, "Promote, through participation, higher academic achievement, better attendance, lower drop-out rates and positive citizenship." UHSAA board of trustees needs to align schools in regions that are geographically close to one another so that students miss a minimum amount of classroom time. This task is difficult to achieve as smaller classifications result in larger geographic areas.

Placing high schools in regions that will increase athletes' travel can have a real effect on students and families. For example, Morgan High School's region placement for 2013-2015 will increase the miles teams must travel by 89 percent and travel time by 78 percent over travel resulting from their previous region placement. In response to the increase in travel, Morgan School District increased the travel fee charged to each participating student athlete from \$25 to \$50. We realize that at times it may be difficult to accommodate all high schools, but the UHSAA board of trustees should do everything possible to address student travel.

Regional Realignment Is Affected by The Increase to Six Classifications

The UHSAA director stated that the main reason for creating another classification was to reduce the ratio between the largest and smallest school in each classification. Additionally, the UHSAA board of trustees wanted to improve health and safety for those who play football. Their concern was that schools playing schools over twice their size jeopardizes the safety of players from smaller schools.

With the decision to expand to six classifications for football came a change in region realignment. Schools that were previously in the 3A, 2A, and 1A classifications are affected the most by the addition of a classification because these classifications had the greatest differences in enrollment size. The UHSAA director said that the schools in these classifications wanted to create an additional classification to reduce these differences in enrollment. Earlier, Figure 2.1 showed the results of expanding to six classifications, which decreased the ranges between the largest and smallest schools.

Some schools have had to increase the travel fee charged to students.

Creating an additional classification reduces differences in enrollment between schools.

Creating an additional classification reduced the number of regions in each classification. For example, the 3A classification previously included 4 regions containing 26 high schools. The current 3A classification has 2 regions with only 12 schools. Since there are now fewer schools in each enrollment-based classification, schools may have longer distances to travel for games as they had with more schools in the classification.

The UHSAA director stated that, 90 percent of the time, the board of trustees attempts to place schools in regions where they are geographically close to other schools. He said this approach does not always work out. For example, Payson High School became the northern most school in the 3AA south region, which contains high schools from Cedar City to St. George. For the region schedule, this placement increased the miles they have to travel by 477 percent and their travel time by 324 percent over two years in their region as compared to their previous region alignment.

The UHSAA director said Payson High School provides an example of the advantage of the two-year classification process, because if a school is placed in a region requiring more travel, the placement is only for two years. The principal of Payson High School echoed this sentiment as well. The principal said that he knows his school will have to travel more but he is excited to have his school in the 3AA region rather than in a 4A region.

Another example is Mountain Crest High School, which, as a bubble school during this process, could have been placed in 5A or 4A classifications. The UHSAA's director said that the board of trustees moved Mountain Crest down to a 4A region in which they would play mostly schools that were relatively close to them. The director said the board of trustees does the best they can to accommodate schools and place them in regions to make the regions competitive as well as control travel as much as possible. He said such placement is not always possible with the diverse range of high school enrollments in Utah and the size of the state.

Schools Are Adjusting for Educational Time Lost to Increase Travel

For many high schools, especially those located in rural areas of Utah, traveling long distances for sports and other activities is the

Some schools are proactive in minimizing the effect of school time lost to traveling for sports and other extracurricular activities.

norm. As a result, many affected schools are trying to be proactive in dealing with the lost education time students experience due to extracurricular activity travel. Schools address the need to supplement students' time away from school by incorporating different methods to offset the loss of classroom time.

For example, two schools we visited set aside time during the lunch period so students who are involved with scheduled extracurricular activities can get extra help from teachers. A third school, in addition to lunchtime help, provides a weekly grade report to the students' parents to keep them informed. This school also assigns each student a mentor teacher to help keep the student on track. Another school requires its athletes to schedule all core classes in the morning and elective classes in the afternoon. Yet another school holds an afternoon study hall Monday through Thursday with tutors available for different subjects for students who need extra help. And finally, another school holds a two-hour study session every Wednesday night.

Principals from the schools we visited said their teachers are required to work with students to make up missed assignments resulting from missing class while representing the school at a sanctioned activity. It should be noted that many of the principals believe students who participate in extracurricular activities are usually highly motivated to get good grades.

Increasing to Six Classifications For all Sports Would Be Expensive

Expanding to six classifications for all sports would increase travel costs and times dramatically for almost all schools. Six classifications works for football because schools only have to travel once every two years to the opponent's home field. This is not the case for other sports, many of which play each other two or more times in a season.

School districts generally charge a participation fee to students for each sport or activity. Student activities that require multiple events could become prohibitively high in travel and time costs under a six-classification system. Some districts charge different amounts based on the sport or activity and others charge the same amount for all activities and sports. Clearly, some additional charges for

Expanding to six classifications for all sports would be costly and reduce time spent in school.

transportation could be necessary. Participation fees might also need to be increased.

Staff at many of the schools we contacted said that they use a portion of participation fees to help cover transportation costs for sporting or activity events. They also said that the district will usually have to supplement their additional transportation costs because they never have enough in their budget to cover the costs. Another cost to consider is the cost to the families of students participating in sports and activities. If travel increased for any sport or activity, there would be a financial impact on parents for travel and also possible time from work to attend the events.

Recommendations

1. We recommend that the Utah High School Activities Association improve its documentation of policies concerning classification and realignment of high school sports and activities.
2. We recommend that the Utah High School Activities Association calculate and use travel costs and travel times when determining region placement for interscholastic activities of their member high schools.
3. We recommend that the Utah High School Activities Association develop policies for high schools to follow in order to petition their classification and region placement.
4. We recommend that the Utah High School Activities Association include all policies and procedures concerning realignment and classification of interscholastic activities in the Utah High School Activities Association handbook.

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Chapter III Student Transfer Process Can Be Improved

The Utah High School Activities Association's (UHSAA) processes for reviewing waiver applications and conducting student transfer appeal hearings appear fair but can benefit from procedural improvements. Despite this apparent fairness, some approved waiver applications lacked proper documentation. Also, the amount of time it takes for the overall process from receiving and reviewing the application to approving or denying an application can be reduced. Finally, the number of appeal hearings, which can be costly, can be decreased by obtaining additional information from the applicants before deciding to deny an application.

The transfer hearings that we reviewed and observed seemed fair, but the overall appeal hearings process should be improved. First, providing parents with the reason(s) for the application denial would allow parents to be better prepared at the appeal hearing. Second, keeping a summary of the appeals rulings for reference may help improve the consistency of rulings. Lastly, student information should be protected by closing appeal hearings to the public unless the parent(s) or guardian signs a waiver.

Application Process Can Be Enhanced

UHSAA's student transfer eligibility application process obtains information required by policy, but the overall application process could be more complete and efficient. UHSAA plans to have an online system operational in early 2014 whereby applications can be submitted electronically. This change should both improve application accuracy and reduce processing time. However, even after the system is operational, UHSAA staff should ensure that submitted applications have all required information.

Also, the amount of time it takes to review and approve applications can be reduced by allowing UHSAA staff to review and approve routine family move applications submitted with the required

UHSAA oversees all athletic student transfers.

Transfers should not be granted unless there is an “unforeseeable, unavoidable, and uncorrectable” circumstance.

documentation. Ensuring all required information is submitted on applications may reduce the number of appeals hearings. This will allow UHSAA staff to be more productive in other areas of their organization.

When an application is received, one of two UHSAA administrative assistants compiles the information and gives it to a UHSAA administrator for review. The administrator determines if the documentation adequately supports whether there is an “. . . unforeseeable, unavoidable, and uncorrectable act, condition, or event. . . .” After the administrator approves or denies the application, the UHSAA administrative assistant sends both an email and a letter notifying the parties of the decision, then files the application.

Generally, a waiver should not be approved unless there is an unavoidable, unforeseeable and uncorrectable circumstance. Figure 3.1 shows that in school year 2012-2013, UHSAA processed 1,474 applications, of which 57 were denied, while 119 applications were incomplete and therefore returned to the applicants, or the student was ineligible.

Figure 3.1 Number of Applications Submitted to the UHSAA in 2012-2013 School Year. Of the 57 applications that were denied, 40 went to an appeals hearing.

Submitted Applications	Applications	Percent
Approved	1298	88%
Denied	57	4
Incomplete and Returned*	119	8
Total	1474	100

Source: Auditor Analysis

**The application was returned to the applicant because it was incomplete, but was not resubmitted.*

As Figure 3.1 shows, most submitted applications are approved. The current system allows applicants to submit incomplete and/or insufficiently documented applications. Sometimes administrators make the decision not to approve or deny applications because of incomplete information.

Most student eligibility transfers are approved.

Some Applications Have Been Approved Without Proper Documentation

Some of the submitted waiver applications that we reviewed had inadequate documentation. Of the 34 applications we sampled, 14

applications submitted were missing required documentation or had clerical errors that did not appear substantive. In total, 47 percent of the sampled applications had some level of error.

Two of the sixteen cases with missing information lacked independent confirmation of required information; in the first case, a student’s mother self-reported she had multiple illnesses, causing difficulty getting the student to school, but provided no confirming documentation. In the second case, the student transferred to a new school and while attending the new school decided that he wanted to transfer back to his old school because he did not like the new school. His application lacked an independent confirmation about the condition of why he wanted to transfer back to his old school. The director said they should have called the student’s old school to confirm that the student was not leaving for a sports reason. He pointed out that, without independent confirmation, a student could be lying and really be requesting the transfer for a “sports” reason (for example, the student does not like the coach or thinks they are not getting enough playing time). In addition to the above concerns, there were 14 cases containing other documentation problems. For instance, several applications had only one document showing the new address when policy requires two documents.

We believe some of these issues can be addressed through better use of check-off boxes by the UHSAA administrative assistants collecting and reviewing the information. Currently, there are check-off boxes on the application form (depending on the type of waiver application) to show the school and parents what documentation is required. If UHSAA staff used these boxes as a way to double check their work, some documentation issues would be identified.

As noted earlier, the UHSAA director said that they are planning on the implementing a new online system. The system will require the applicant to input required information before the application can be submitted. This change should help to reduce the number of clerical errors or incomplete applications.

Application Review Workload Can Be Better Distributed

Waiver application determination times can be reduced by allowing administrative assistants to approve waiver applications that

Some applications require independent verification to ensure accuracy of the application.

Check-off boxes should be used to verify required documentation has been received.

consist of straightforward family moves. This restructuring would allow UHSAA’s administrators to be more productive in other areas of the organization. Currently, UHSAA administrators spend significant time reviewing and approving or denying these applications. Many waiver applications, particularly those based on a family move, are straightforward and can easily be reviewed and approved by an administrative assistant. For a family-move-related transfer, all that is required is a completed application and two forms of verification showing the family (parents and children) have moved to a new residence. Nevada reports that they successfully use administrative assistant approvals for straightforward family moves.

Figure 3.2 is a summary of 34 applications we sampled, half of which involved a family move. Applications such as these are the least difficult to review and approve.

Figure 3.2 Sample of Applications Submitted to the UHSAA in the 2012- 2013 School Year. A family move is frequently the main reason applications for student transfers are submitted to UHSAA.

Reasons for Applications	Count	Percent
Family Move	17	50%
Hardship	11	32
Foreign Exchange	6	18
Total	34	100%

Source: Auditor Analysis

Allowing administrative assistants to approve a family move should shorten the time from application receipt to approval. Currently, it takes roughly 11 days from the time an application is given to an administrator to the time it is approved or denied, with 71 percent of approvals occurring within one week and 92 percent occurring within one month. If the current procedure of transferring the waiver application between the administrative assistant and the UHSAA administrator is eliminated, application processing would take less time overall.

Allowing UHSAA administrative assistants to directly approve family move applications would need some policy direction. For example, UHSAA staff have pointed out that, at times, a family move is not as simple as it appears, citing instances of students moving in with a grandparent in order to play for a different team. We agree with their concerns and believe that policies should be developed to

Some applications can take up to a month before they are approved or denied.

delineate when questionable cases should be referred to a UHSAA administrator as well as defining the administrative review of staff decisions.

Reducing the Number of Appeal Hearings Will Allow Resources to Be Used More Productively

Reducing the number of hearings will decrease the staff time spent participating in hearings and allow those resources to be used in more productive areas. According to UHSAA's database, 40 cases were appealed last year under the transfer rule, which can limit a student's activity involvement. We believe the transfer rule process can be enhanced in both the application review steps as well as the appeal hearing process.

The transfer rule, which prohibits a transferring student from playing competitively for one year, is designed to discourage students from transferring from one high school to another for athletic reasons. One goal of UHSAA is to "protect individual students from the effects of over-emphasis on activities and athletic competition which may interfere with the more important regular progression of the student's education." UHSAA policy states that the rule "limits the ability of those who would manipulate a student" for athletic reasons. All states we contacted have a transfer rule prohibiting transferring students from competing for a time period unless a waiver is granted.

In most states, the transfer rule can be overturned if a waiver is granted, as discussed in the previous section. There are times when a student changes high schools for a non-sports reason, such as a family move to an area inside another high school's boundaries. In these cases, the parent(s) can apply for a waiver to allow their student to play competitively without waiting one year. A UHSAA administrator reviews and approves or denies the waiver application. The student is entitled to an appeal hearing, if his/her waiver application is denied.

We reviewed the content of 14 recent cases with UHSAA's administrators and together determined that in four (29 percent) cases, the hearing would not have been necessary had the parents submitted all their information when making the initial waiver application. Currently, UHSAA administrators accept or deny waiver applications based on submitted information. When an application is

Ensuring required information is collected would help to avoid costly appeals hearings.

denied, the UHSAA administrator automatically informs the student that he/she is eligible for an appeals hearing.

To reduce the number of appeals, we suggested that before an application is denied, UHSAA administrator(s) contact the applicant to explain why the application was denied and ask if there is additional relevant information. As a result, the UHSAA executive director piloted a program informing the parent:

- The reason why their waiver application was denied
- The denial is provisional subject to any additional information they might submit

The director reported that, in the past, several hearings were likely avoided because parents provided additional information that resulted in an approved application rather than a denial. Encouraging this practice could result in better, more consistent decisions and a reduction in the time and cost of hearings. Figure 3.3 shows the estimated costs for a typical case as well as the costs for a typical meeting held. At each appeals meeting, the appeals committee will usually hear three to four appeals cases.

UHSAA should do everything they can to mitigate costly appeals hearings.

Figure 3.3 Estimated UHSAA Costs for Each Appeals Case. UHSAA will usually schedule up to four cases for each meeting that is held. These cost estimates do not include costs incurred by the parents.

Estimate Basis	Estimate Costs
For each case	\$ 1,292
For each meeting*	5,166
Per year (10 meetings)	51,660

Source: Auditor Analysis

**Multiple cases can be heard during a single meeting.*

It generally takes an hour to hear and rule on a case. Three panel members hear the case with the assistance of the UHSAA executive director and staff. Additional, non-UHSAA costs are incurred by others. Schools often send representatives to the hearings, taking them away from their normal responsibilities. Additionally, the student and parent(s) or guardian(s) attend the hearing, required them to be away from school and/or work. Giving students the chance to appeal is essential but a hearing should only be held when necessary. Reducing

the number of cases appealed will allow resources to be used more productively. Once an application is denied by UHSAA, the student has the option to appeal the decision.

Transfer Appeal Hearings Can Be Improved

Our observations and discussions indicate that the appeals hearings appear impartial but can provide more clarity and uniformity through expanding policy. Suggested improvements include the following:

- Providing the student/parent with the reason the application was denied
- Documenting necessary appeals rulings and membership
- Closing appeals hearings that discuss protected student information unless previously authorized

Implementing additional policy guidance requiring the improvements listed above would likely increase hearing consistency and might eliminate the need for some future appeals hearings.

Several tests showed that the appeals hearings appear impartial. First, we observed three hearings and in the 14 cases considered and ruled on by the panel appeared reasonable and objective. Second, we talked to five parents who felt they were treated fairly regardless of the desired outcome of the appeal. Third, according to the UHSAA’s attorney, litigation has declined in the last fifteen years. And, fourth, a recent court ruling found that UHSAA rules are not “...arbitrary and capricious.” Also, the court found that the hearing panel made its decision on adequate evidence in the particular case.

Information Needs to Be Provided to Parents before the Appeals Hearing

The appeals hearing panel can enhance fairness by better informing parents of what to expect at the hearing. Currently, before parents and the student attend the appeals hearing, they are only informed that their child’s application was denied but have not been informed of the reason(s) for the denial.

**Eligibility appeals
hearings appear to be fair.**

Parents should be provided with the reason the transfer was denied before the appeals hearing.

Several parents at the hearings we observed said that they were unsure what the panel was going to cover and had to prepare themselves by guessing what was going to be reviewed. Giving parents advance notice of what will be covered during the hearing and also incorporating this practice into policy could aid in reducing both the number of hearings and the time necessary for hearings. UHSAA's director and attorney agree with this recommendation and suggest parents be told that the hearing will address, at a minimum, the following issues:

- Why the application for waiver was denied
- What evidence for hardship exists if the student remains at the school

This practice is followed by several western states that provide guidance on what the hearing panel will address. For instance, in Nevada's appeal hearing, the ". . . pupil must prove by a preponderance of the evidence that:

- The hardship exists; and
- If the determination relates to a transfer by the pupil, the pupil was not recruited to make the transfer."

In Oregon, the petitioner shall provide ". . . a statement describing the way in which the petitioner asserts the determination violates . . . rules of OSAA and whether the petitioner wishes to present additional evidence beyond that which was produced previously and, if so, what that evidence will establish. . . ."

Giving parents an opportunity to appeal a waiver denial decision enhances credibility because it provides a check and balance on UHSAA administrative decisions. This check and balance helps ensure that waivers are denied fairly and consistently.

Documentation of Appeals Rulings And Membership Is Needed

The appeals hearing panel can enhance fairness by recording board decisions in a searchable medium. Fairness can also be increased by

ensuring that panel members do not reside in the same region(s) involved in the student request. Current policy and procedures for the appeals hearing panel require that there be three board members, that the panel base its decision on the evidence presented, and that the decision of the appeals hearing panel is final. The policies and procedures in UHSAA's current handbook do not address these additional concerns and need to be updated to make the hearing process more consistent.

Appeal Decisions Should Be Documented for Greater Consistency. Incorporating prior board decisions into a database and/or expanding UHSAA's handbook will help keep board decisions consistent over time. Appeals hearing members often change. To enhance fairness, we believe that, for each case, a short summary of the hearing panel's decision should be incorporated into a database or into an expanded UHSAA handbook and, when relevant, considered as part of future hearings. UHSAA administrators said that a historical record would be useful for institutional memory when UHSAA's attorney retires. He has been their attorney for over 20 years and panel members rely on him to advise them about following rules and maintaining consistency. We discussed this issue with a hearing panel member who agreed with us and added that past appeals panel decisions would be useful as part of training for new board members.

A case from our application sample illustrates the need for a historical record. In this case, the requirement that a "hardship shall generally not be granted unless there is an unforeseen, unavoidable and uncorrectable act, condition or event which causes the imposition of a severe and non-athletic burden upon the student and/or his/her family" was not met. This student went to one school because she wanted to participate in its theater program but her parents wanted her to go to another school that was a shorter distance from home. After one year, the student agreed to change schools to the one her parents wanted. She wanted to compete in track at the new school and so applied for a waiver and was approved.

This case did not appear to meet the burden of showing an unforeseen, unavoidable and uncorrectable act because the student changed schools based on convenience, which was known from the beginning.

Appeals hearing summaries are not being kept.

The executive director said that this waiver was granted because the appeals hearing panel has, in a prior ruling, allowed students to go back to their boundary school as long as they had not participated in sports before. The executive director agreed with us that the principle of allowing students to go back to their boundary school as long as they have not participated in sports before should be used as guidance in future applications and hearings.

UHSAA can incorporate board decisions into a database and/or expand its handbook to incorporate prior decisions as is done in other states. For example, Colorado addresses the above issue of students returning to their boundary school in policy, which states:

A student who has not participated in an interscholastic contest or scrimmage for any team at any level while a student in the previous high school shall be varsity eligible at all levels in all sports provided he/she returns to the high school he/she attended prior to the period of nonparticipation.

Another way some states incorporate appeal decisions into policy is through a question-and-answer format. Under this format, a question is listed and the answer given, which illustrates and expands on the rule.

Independence of Appeal Panel Membership Should Be in Policy. To avoid the appearance of bias, hearing panel members need to be from different regions than those involved in students' appeals. The executive director said that, when he sets up the hearing, he selects panel members from different regions than the region of the student making the appeal. We reviewed 14 recently appealed cases and, though in 13 cases the panel members were from different regions, in one case, an appeals hearing panel member lived in the same region as the student making the appeal. The executive director said that this case was an oversight and agreed that the requirement that panel members be from different regions should be part of policy. Requiring panel members to be from different regions than the appealing student and incorporating this practice into policy will enhance fairness.

To avoid bias, appeals panel members should be from a different region than the student who is appealing.

Student Information Should Be Protected in Appeals Process

The appeals hearings should be closed to the public whenever protected student information is involved unless the student's parent(s) agree to an open hearing. Currently, hearings can be attended by representatives of the news media, even though students' grades and behavior are openly discussed.

According to the Federal Family Educational Rights and Privacy Act (FERPA), "schools or administrators must have written permission from the parent(s) or eligible student in order to release any information from a student's education record". UHSAA currently does not require parents to relinquish their FERPA rights on their applications. Many principals told us that they think the appeals hearings should be closed to the public to protect students' information that may be discussed in these hearings. All the contacted western states close eligibility hearings to the public or in some instances, allow the public only if parent(s) sign a waiver. UHSAA's attorney said that the hearings have been open in order to promote transparency between UHSAA and the public.

Current appeals hearings are open to the public.

Recommendations

1. We recommend that the Utah High School Activities Association develop processes to ensure that transfer appeal applications include adequate documentation, such as requiring reviewers to use a checklist.
2. We recommend that the Utah High School Activities Association develop a process that allows staff to approve simple family move applications under certain circumstances.
3. We recommend that Utah High School Activities Association administrators inform the parent(s) or guardian(s) about denied applications, including the reason for the denial, in writing or an email.

4. We recommend that the Utah High School Activities Association administrator inform the parent(s) or guardian(s) that the denial is provisional, subject to any additional information that is provided.
5. We recommend that the Utah High School Activities Association maintain a record of appeals decisions.
6. We recommend that the Utah High School Activities Association develop policy to ensure that appeals panel members reside in different regions than the applicant.
7. We recommend that appeals hearings be closed to the public to comply with Family Educational Rights and Privacy Act (FERPA), unless a parent(s) signs a waiver to have an open meeting.

Appendices

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Appendix A

UHSAA Realignment Timetable for the 2013-2015 Season(s)*

January 2011	Select realignment classification committee chair
March 2011	Select realignment classification committee members at Board of Trustees meeting
April 2011	Select realignment classification committee members at executive committee meeting.
January 2012	Recommendations to the executive committee and to the Board of Trustees for the realignment format and procedures, for the range of member schools in each classification and for the number of regions in each classification
January 2012	Board of Trustees meeting—first consideration on the realignment format and procedures, the range of member schools in each classification and the number of regions in each classification
March 2012	Public hearing on the realignment format and procedures, the range of member schools in each classification and the number of regions in each classification
March 2012	Board of Trustees meeting—second consideration on the realignment format and procedures, the range of member schools in each classification and the number of regions in each classification
November 2012	Board of Trustees meeting—first consideration on the alignment of member schools in each region
November 2012	Public hearing on the alignment of member schools in each region
November 2012	Board of Trustees meeting—second consideration on the alignment of member schools in each region (regions finalized)
Spring 2013	Region organizational meetings are conducted
August 2013	Competition for new UHSAA alignment begins

**Source: Utah High School Athletic Association*

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Appendix C

2013-2015 UHSAA Alignment

1st of 2 Considerations

Five Classifications - All Other Sports

Schools Highlighted in yellow are considered to be tied in enrollment

24-28			28-32			16-24			16-24			1A		
5A	Diff:	Avg:	4A	Diff:	Avg:	3A	Diff:	Avg:	2A	Diff:	Avg:	1A	Diff:	Avg:
	597	1306		325	917		677	819		256	276		124	54
Schools 25		SD: 165	Schools 30		SD: 102	Schools 22		SD: 248	Schools 24		SD: 81	Schools 30		SD: 25
Ratio	Small	Large	Ratio	Small	Large	Ratio	Small	Large	Ratio	Small	Large	Ratio	Small	Large
1.55	1093	1690	1.43	760	1085	2.4	485	1162	2.46	175	431	6.64	22	146
School	11&12	12-Oct	School	11&12	12-Oct	School	11&12	12-Oct	School	11&12	12-Oct	School	11&12	12-Oct
Alta	1690	2466	Brighton	1085	1684	Ben Lomond	747	1162	Manti	270	431	Duchesne	104	146
Bingham	1608	2388	Granger	1066	1695	Uintah	742	1149	Emery	267	422	Monticello	84	134
Davis	1557	2366	Clearfield	1059	1680	Stansbury	739	1122	Delta	268	417	Legacy	89	133
Lone Peak	1545	2345	Sky View	1051	1616	Snow Canyo	721	1116	American Le	229	382	Whitehorse	84	132
Copper Hills	1542	2459	Olympus	1050	1551	Dixie	710	1080	Summit	154	344	Diamond Ra	83	123
American Fork	1386	2133	East	1050	1552	Park City	709	1075	Grand Count	231	336	St. Joseph	86	122
Herriman	1359	2169	Roy	1036	1556	Pine View	678	1020	South Sevier	222	335	Altamont	75	116
Hunter	1353	2107	Bountiful	1011	1457	Desert Hills	658	1023	South Summ	206	325	Monument V	82	114
West	1321	1956	Kearns	1007	1589	Tooole	612	1001	San Juan	199	303	Wayne	73	111
Syracuse	1304	1989	Cyprus	996	1599	Bear River	601	896	Merit	177	289	Pinnacle	72	109
Cottonwood	1300	1999	Timpview	951	1450	Hurricane	594	890	Maeser	169	279	Wendover	70	102
Pleasant Grove	1296	1921	Skyline	950	1472	Cedar City	519	794	Beaver	172	261	Panguitch	53	96
Lehi	1269	2041	Murray	938	1422	Canyon View	483	726	Wasatch Ace	184	255	Rich	58	90
Northridge	1231	1865	Timpanogos	931	1403	Carbon	423	651	Rockwell	146	249	Milford	49	85
Weber	1202	1841	Mountain Vi	906	1321	Juan Diego	405	616	Gunnison Va	162	247	Piute	46	82
Layton	1184	1741	Woods Cros	897	1348	Union	371	582	Rowland Ha	159	221	Cross Creek	56	76
Fremont	1171	1846	Box Elder	889	1401	Grantsville	368	566	Millard	136	221	Valley	47	73
Viewmont	1165	1724	Bonneville	886	1332	Judge Memc	350	542	North Sevier	118	203	Bryce Valley	49	64
Taylorsville	1165	1719	Springville	882	1366	Morgan	364	542	North Summ	132	197	West Ridge	47	60
West Jordan	1161	1776	Highland	860	1350	Richfield	308	491	Layton Chris	133	183	Green River	37	56
Jordan	1156	1749	Provo	847	1283	Juab	326	487	Parowan	131	183	Oakley	48	55
Westlake	1125	1806	Ogden	839	1293	North Sanpe	307	485	Enterprise	118	183	Tintic	28	51
Hillcrest	1114	1715	Maple Mour	838	1254				Waterford	112	177	Intermounta	31	45
Mountain Crest	1093	1684	Logan	801	1241				Kanab	123	175	Dugway	29	43
			Corner Cany	800	1200							Escalante	32	41
			Salem Hills	795	1238							Mount Vern	30	37
			Wasatch	787	1174							Tabiona	21	35
			Orem	786	1146							Manila	20	32
			Payson	769	1165							Navajo Mou	15	23
			Spanish Fork	760	1166							Concordia	15	22

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Appendix D

2013-2015 Regional Realignment for 3AA High Schools: Estimated Travel Costs and Time for Two Years Compared to 2011-2013 Alignment Schedule. Changing to six classifications increased regional travel costs and times for most of the high schools in the 3AA classification.

High Schools	Change in Travel Costs*	Percent Change in Miles Traveled*	Percent Change in Travel Time*
Payson	\$17,739	477%	324%
Pine View	2,865	136	87
Dixie	2,850	130	78
Snow Canyon	2,850	116	71
Desert Hills	2,850	117	85
Hurricane	2,835	113	74
Ben Lomond	3,459	86	74
Uintah	8,153	84	77
Cedar City	2,911	74	59
Stansbury	2,454	52	48
Tooele	2,560	51	44
Bear River	3,459	50	48
Park City	2,042	39	35
Juan Diego	152	2	1

Source: Auditor analysis

**Includes Varsity and JV estimated travel costs for two years*

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Appendix E

2013-2015 Regional Realignment for 3A High Schools: Estimated Travel Costs and Times for Two Years Compared to 2011-2013 Alignment Schedule. Changing to six classifications increased regional travel costs and times for most of the high schools in the 3A classification.

High Schools	Change in Travel Costs*	Percent Change in Miles Traveled*	Percent Change in Travel Time*
Canyon View	\$7,254	173%	139%
Morgan	4,526	89	78
Grantsville	4,313	83	75
Juab	1,859	49	39
Union	2,149	27	29
North Sanpete	1,189	25	17
Judge Memorial	1,478	24	22
Carbon	914	12	10
Delta	46	1	(2)
Emery	(1,920)	(16)	(21)
Manti	(2,819)	(34)	(39)
Richfield	(7,650)	(56)	(51)

Source: Auditor analysis

*Includes Varsity and JV estimated travel costs for two years

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Appendix F

2013-2015 Regional Realignment for 2A High Schools: Estimated Travel Costs and Time for Two Years Compared to 2011-2013 Alignment Schedule. Changing to six classifications benefited most of the schools in the 2A classification by reducing costs and travel times for region games.

High Schools	Change in Travel Costs*	Percent Change in Miles Traveled*	Percent Change in Travel Time*
North Sevier	\$3,810	45%	25%
Gunnison	2,149	27	18
Layton Christian	1,478	21	15
Millard	503	5	-2
Summit	107	2	-4
Parowan	(1,250)	-8	-11
Enterprise	(1,417)	-7	-8
Beaver	(1,448)	-10	-13
South Sevier	(1,768)	-13	-15
San Juan	(4,389)	-15	-15
Grand	(5,105)	-21	-22
South Summit	(4,465)	-38	-39
American Leadership	(2,012)	-24	-25
North Summit	(5,563)	-42	-40

Source: Auditor analysis

*This includes Varsity and JV estimated travel costs for two years

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Appendix G

2013-2015 Regional Realignment for 1A High Schools: Estimated Travel Costs and Time for Two Years Compared to 2011-2013 Alignment Schedule. Changing to six classifications benefited schools in the 1A classification by reducing costs and travel times for region games.

High Schools	Change in Travel Costs*	Percent Change in Miles Traveled*	Percent Change in Travel Time*
Rich	\$1,295	14%	12%
Duchesne	381	5	0
Altamont	(15)	0	(5)
Monticello	(427)	(3)	(1)
Diamond Ranch	(549)	(3)	(3)
Whitehorse	(1,996)	(16)	(14)
Monument Valley	(2,103)	(18)	(20)
Milford	(3,505)	(20)	(23)
Kanab	(6,599)	(35)	(35)

Source: Auditor analysis

**Includes Varsity and JV estimated travel costs for two years*

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Agency Response

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Utah High School Activities Association

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January 29, 2014

John Schaff, CIA
Office of the Legislative Auditor General
W315 State Capitol Complex
Salt Lake City, Utah 84114-5315

Dear Mr. Schaff:

Thank you for the opportunity to review and respond to "A Performance Audit of the Utah High School Activities Association (UHSAA)." We appreciate the courtesy, professionalism and dedication of you and your staff and the tremendous amount of work and time this required of your office.

This report should be extremely useful to the UHSAA Board of Trustees, the policy making body of the Association. These recommendations can advance the board's procedures and processes as it balances the difficult decisions in regards to realignment of member schools into classifications and regions. We also appreciate the recommendations that can help improve and streamline fair decisions in the student transfer process from one high school to another. Your report provides recommendations that are important to our discussions and the ability to improve our function as an Association.

Furthermore, this report will be discussed at length at our next Board of Trustees meeting to determine, define, develop and document policies and procedures. Thank you again for the service and assisting us to become a better organization. We appreciate the opportunity to engage with you and your staff during this audit.

Respectfully,

A handwritten signature in black ink, appearing to read "Robert C. Cuff", is written over a horizontal line.

Robert C. Cuff, CAA
UHSAA Executive Director

CHAPTER II

In responding to Chapter II of the Performance Audit of the UHSAA entitled “UHSAA Classification Changes Have Tradeoffs,” the Association appreciates the analysis of the Office of the Legislative Auditor General and affirms the appropriateness of the title of this chapter.

The goal of the Association in the realignment of member schools into classifications and regions is to balance inevitable tradeoffs in the best way possible. Part of that balance is the responsibility placed on the Board of Trustees by the UHSAA Constitution to “Prepare and approve, for the purposes of fair and prudent competition in the activities sponsored by the Association, a statewide classification of schools and region alignment in those classifications,” (UHSAA Constitution, Article 2, Sect. 1-A-2-e).

A tradeoff the Association faces in attempting to maintain the balance is that in order to preserve health and safety and competitive fairness, additional travel may be required. The establishment of six classifications in football is an example. The number of games in football, and therefore the number of trips, is fewer than in other sports. In football the size of a school’s enrollment is more of a factor in the health and safety of students than in other sports. In consideration of these factors, the Board of Trustees took proactive measures they collectively felt prudent, namely to reduce the difference in enrollment between the largest and smallest schools (ratios) within a classification.

The audit’s research and tables reflecting additional travel costs and times only include region football games. This data represents only a fraction of a school’s full football schedule. It is the responsibility of member schools to schedule non-region football games. Travel costs and times are often minimized by member schools playing neighboring member schools in other classifications not assigned to the region schedule. Furthermore, district schools of different classifications will play each other in non-region games, drastically reducing overall travel costs and times. Despite factoring only region football games, most 2A and 1A member schools benefited from changing to six classifications in football by reducing travel costs and times.

Regarding the four recommendations included in Chapter II, all reflect positive changes that the Association has already begun to implement. The Association has posted on its website the format and procedures for the 2015-17 alignment initially approved on first consideration. As has been the case in previous alignments, all member schools, districts, and member school governing boards have been sent the proposed format and procedures. Additionally, a request for comments and concerns has been solicited through the Association website and will be presented to the board.

Member schools, districts, and member school governing boards have been notified and will have the opportunity, as in previous alignments, to provide input on format and procedures at a public hearing before the Board of Trustees before any final action is taken. The research and

findings of this audit will be valuable information as the board finalizes the format and procedures in March 2014 for the 2015-17 alignment of member schools.

CHAPTER III

In responding to Chapter III of the Performance Audit of the UHSAA entitled “Student Transfer Process Can Be Improved” the Association is gratified by the audit’s confirmation that the hearings on student transfer eligibility are “fair.” It is of paramount importance to the Association that its adjudication of eligibility and rules violations are fair and reasonable.

The Association agrees that the processes by which those decisions are reached can be improved. The Association welcomes and looks forward to implementing the recommendations for improvement in gathering information, streamlining procedure, and finding an appropriate balance between transparency and privacy.

Nearly all of the recommendations will be encompassed through the Association’s current revamping of its online submissions. Some of the suggestions, such as a written catalogue of panel decisions, have been previously implemented and were ended because of costs and a seeming lack of public or private interest. It makes sense to reinstitute those, at the audit’s recommendation, and revisit their utility in the future.

Immediate steps will be taken to begin discussing and implementing all recommendations in Chapter III.