The Changing Landscape of Single-Sex Education

By John D. Hurst and Ingrid M. Johansen

Single-sex education is receiving renewed attention around the country. According to the National Association for Single Sex Public Education, at least 253 public schools in America offer some form of single-sex education.[1] While the majority of these programs are single-sex classes within coed schools, 51 are single-sex schools.[2] These numbers are likely to grow in light of substantial changes to Title IX regulations. The amended regulations allow local education agencies (LEAs) to establish single-sex classes, extracurricular activities, and schools as long as the excluded sex is offered a substantially comparable educational opportunity.

Substantive Arguments

The Case for Single-Sex Programs

The arguments for single-sex schools and classrooms fall into two categories. The first category is pedagogical: advocates argue that teaching methods that take into account the social or biological differences between girls and boys can be more effective.[3] For example, a 1992 study by the American Association of University Women Educational Foundation reported a general bias in favor of methods that work well for boys.

> Research reveals a tendency, beginning at the preschool level, for educators to choose classroom activities that appeal to boys' interests and to select presentation formats in which boys excel. The teacher-student interaction patterns in science classes are often particularly biased . . . . Teaching methods that foster competition are still standard, although a considerable body of research has demonstrated that girls—and many boys as well—learn better when they undertake projects and activities cooperatively rather than competitively.[4]

The second category of arguments in favor of separate education for boys and girls centers on the perceived negative impact on learning resulting from social interactions between girls and boys. Some advocates of single-sex education worry that both girls and boys may suppress themselves intellectually to impress the opposite sex. A recent U.S. Department of Education (DOE) systematic review of research comparing single-sex and coeducational schooling concluded that a "majority of studies supported the position that [single-sex] schooling resulted in higher academic aspirations, as evidenced by students showing more interest in and taking more difficult courses."[5]

Some educators believe that classroom interaction between boy and girl students is simply too distracting. Dorothy Works, a teacher in the Chapel Hill–Carrboro (NC) public schools, has labeled these interactions "social goo." "It had occurred to me many, many times, [W]hat if we could just split up boys and girls, and knock out all that daily drama?"[6]

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1. National Association for Single Sex Public Education, "Single-sex public schools in the United States," at http://www.singlesexschools.org/schools-schools.htm. (last visited November 10, 2006).

2. *Id.* These statistics exclude correctional schools for juvenile delinquents.

3. Wellesley College Center for Research on Women, *The AAUW Report*: *How Schools Shortchange Girls,* Executive Summary, 2 (American Association of University Women Educational Foundation, 1992), available at http://www.aauw.org/research/hssg.pdf (last visited March 6, 2006).

4. Additionally, there are some indications that in a coeducational classroom male students seem to demand, or at the very least receive, more attention than their female counterparts. *Id.*

5. U.S. Dep't of Educ., *Single-Sex Versus Coeducational Schooling: A Systematic Review* (2005), 84, available at www.ed.gov/rschstat/eval/other/single-sex/single-sex.pdf (last visited January 16, 2007).

6. Patrick Winn, "Teachers Try Removing the Opposite Sex," *Raleigh News and Observer* (February 22, 2006), A1.

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Unfortunately there is little definitive empirical evidence on the effectiveness of single-sex education.[7] Studies do, however, show differing achievement for boys and girls. Throughout the primary grades the performance of female students consistently exceeds that of male students in the areas of reading and writing.[8] In science, boys and girls perform similarly at age nine, but beginning in middle school girls start to fall behind. By the time they are thirteen, white boys begin to surpass white girls in science, and by seventeen both white and Hispanic males outshine their female counterparts. Some proponents of single-sex education view this achievement gap as evidence that coeducation hurts female students, but the actual causes are hard to pinpoint. A similar gender gap in achievement once existed in mathematics, but current data indicate that it has begun to close.

In spite of their superior achievements in science, and perhaps math, the prevailing wisdom is now that male students are generally less successful academically than their female counterparts. Their higher failure rates at all levels of education have gained publicity lately, as evidenced by a *Newsweek* cover story entitled, "The Trouble with Boys."

> In elementary school, boys are two times more likely than girls to be diagnosed with learning disabilities and twice as likely to be placed in special-education classes. High-school boys are losing ground to girls on standardized writing tests. The number of boys who said they didn't like school rose 71 percent between 1980 and 2001, according to a University of Michigan study. Nowhere is the shift more evident than on college campuses. Thirty years ago men represented 58 percent of the undergraduate student body. Now they're a minority at 44 percent.[9]

Many colleges, especially colleges just below the narrow tier of the most competitive schools, have difficulty finding enough qualified male candidates and may be admitting male students who would not otherwise qualify for admission.[10]

Given the mixed nature of the research findings, it is hard to determine whether either sex is being hurt by coeducational programs and whether there is any substantial benefit to single-sex education. The strongest statement in favor of single-sex schools is found in a recent DOE summary of research findings: "In general, more studies reporting the positive effects of [single-sex] schools on all-subject achievement test scores were found than studies reporting the positive effect of [coeducational] schools."[11]

The Case Against Single-Sex Programs

Many people oppose single-sex educational programs for some of the same reasons that proponents support them. For example, the boy-girl socialization that occurs in middle and high schools may indeed be distracting, but it also may be beneficial. Second, segregating classrooms and schools by sex may be seen as a surrender to stereotypes rather than a way to correct them. One rationale behind single-sex education—that the sexes learn differently—may not be true for every individual student. Even worse, some argue, separating students by sex may create the perception that boys and girls must be separated because they are not equally intelligent.

Another concern is that single-sex classrooms may accelerate achievement in areas of strength but de-emphasize other subjects or learning styles. That is, single-sex education may not improve female students' mathematics and science learning or male students' performance in reading and writing.

Legal Arguments

Recently the DOE adopted new Title IX regulations specifically addressing the issue of single-sex education. These new rules will be discussed below, along with the potential constitutional issues involved in single-sex education programs. The U.S. Supreme Court has ruled that the Virginia Military Academy's refusal to admit women violated the Equal Protection Clause.[12] Whether the Court will extend the VMI reasoning to publicly funded elementary and secondary schools is unclear. In addition, many state constitutions have their own equal protection provisions—some of which provide even stronger protection than the federal constitution's.[13]

Congress expressed an interest in supporting single-sex schools and classrooms in the No Child Left Behind Act of

7. Rosemary Salomone, Symposium, "Rich Kids, Poor Kids, and the Single-Sex Education Debate," *Akron L. Rev.* 34 (2000): 209, 224.

8. Richard J. Coley, *Differences in the Gender Gap: Comparisons across Racial/Ethnic Groups in Education and Work* (Princeton, NJ: Educational Testing Service, 2001), 14–15, available at http://www.ets.org/Media/Research/pdf/PICGENDER.pdf (last visited April 2, 2006).

9. Peg Tyre, "The Trouble With Boys: They're Kinetic, Maddening and Failing at School. Now Educators Are Trying New Ways to Help Them Succeed," *Newsweek*, January 30, 2006, 44.

10. Richard Whitmore, "Boy Trouble," *New Republic*, January 23, 2006, 15.

11. U.S. Dep't of Educ., *Single-Sex Versus Coeducational Schooling*, 83.

12. United States v. Virginia, 518 U.S. 515 (1996) (State-sponsored, male-only military college violates Equal Protection Clause.).

13. *See, e.g.*, Garrett v. Bd. of Educ., 775 F. Supp. 1004 (E.D. Mich. 1991).

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2001 (NCLB).[14] The act amended the Elementary and Secondary Education Act to allow LEAs to use Innovative Programs funds to support same-sex schools and classrooms as "*consistent with other law*."[15] As this provision raises the obvious question of what other laws say about single-sex education, the NCLB directed DOE to release new guidelines to LEAs explaining how "other law" applies to single-sex classes and schools.[16]

Title IX

As directed by the NCLB, DOE released new Title IX regulations.

Title IX generally prohibits sex-based discrimination in education programs or activities receiving federal financial assistance. Specifically, it states that, "[n]o person in the United States shall, on the basis of sex, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any education program or activity receiving Federal financial assistance."[17] By definition, this general prohibition includes not only higher education but also "public or private preschool, elementary, or secondary school[s]."[18]

Before the new regulations, Title IX largely prohibited primary and secondary schools from having single-sex classrooms within a coeducational school. One regulation stated:

> A recipient [of federal funds] shall not provide any course or otherwise carry out any of its education program or activity separately on the basis of sex, or require or refuse participation therein by any of its students on such basis, including health, physical education, industrial, business, vocational, technical, home economics, music, and adult education courses.[19]

The regulations contained three exemptions from this prohibition. Separation of students by sex was allowed (1) as remedial or affirmative action,[20] (2) in physical education classes involving sports with bodily contact,[21] and (3) in an elementary or secondary school class unit dealing with human sexuality.[22]

That regulatory landscape has now changed radically. Under the new regulations, single-sex classes and extracurricular activities are permitted, as long as they are substantially related to the achievement of an important objective. The DOE has identified a couple of important governmental objectives: (1) improving the educational achievement of students through diverse educational opportunities, or (2) meeting the particular, identified needs of students.

The DOE analysis of the changed regulations makes it clear that the first objective—providing diverse educational opportunities—is not satisfied by simply offering a single-sex class and declaring that it by definition promotes diversity and opportunity. At the LEA level, single-sex and coeducational opportunities must be part of an array of options—for instance, charter schools, magnet schools, or coeducational schools—that offer both single-sex and coeducational classes. At the school level, diverse options might include a range of elective classes or the opportunity to take some courses at another school.[23]

As to the second objective—identifying and responding to the particular needs of students—the DOE analysis suggests that students' limited or deficient educational achievement may signal the need for such innovative educational programs as single-sex classes or schools.

In implementing a single-sex class or activity, LEAs are subject to an *evenhandedness* requirement as between males and females.[24] Before implementing a single-sex program, therefore, an LEA must pay equal attention to assessing the educational needs of males and females. Evenhandedness also means that LEAs must always provide a substantially equal *co*educational class or extracurricular activity in the same subject or activity. The reason for this coeducation requirement is that Title IX regulations require that student participation in single-sex classes or activities be voluntary.[25] If an LEA does not provide a substantially equal coeducational opportunity, then the choice to attend a single-sex class or activity is not voluntary. Sometimes the offer of a substantially equal coeducational alternative will meet the requirement of evenhandedness. In other cases,

14. Pub. L. No. 107-110, Sec. 501, 115 Stat. 1425, 1425 (2002). *See also* James M. Sullivan, "Note, The Single-Sex Education Choice Facing School Districts After the No Child Left Behind Act of 2001 Is Not the One That Congress Intended," *Geo. J. on Poverty L. & Pol'y* 10 (2003): 381.

15. Pub. L. 107-110, Sec. 5131(a)(23), 5131(c) (emphasis added).

16. *Id.*

17. 20 U.S.C. § 1681 (2006). Section 1681(a) of Title IX contains two other limited exceptions related to primary and secondary education. Subsection 1681(a)(7)(B) permits federal funding for Boys State and Girls State conferences and Boys Nation and Girls Nation conferences, and subsection 1681(a)(8) permits father-son or mother-daughter activities. Even under these exceptions, if an activity is provided to one sex, opportunities for comparable activities must be provided to the other sex. Finally, Title IX does not apply to institutions controlled by religious organizations if Title IX prohibitions would be inconsistent with the religious tenets of the organization. § 1681(a)(3).

18. § 1681(c).

19. 34 CFR § 106.34 (2004).

20. § 106.3.

21. § 106.34(c).

22. § 106.34(e).

23. 71 Fed. Reg. 62530, 62535 (Oct. 25, 2006).

24. 34 C.F.R. §106.34(b)(1)(ii) (2006).

25. § 106.34(b)(1)(iii).

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evenhanded implementation of a single-sex class or activity may require the establishment of a substantially equal single-sex class or activity for students of the other sex.

The DOE plans to assess the substantial equality of particular programs (when complaints are made) by examining a number of factors, individually or in the aggregate, as appropriate. They include but are not limited to

> [t]he policies and criteria of admission, the educational benefits provided, including the quality, range, and content of the curriculum and other services and the quality and availability of books, instructional materials, and technology, the qualifications of faculty and staff, geographic accessibility, the quality, accessibility, and availability of the facilities and resources provided to the class, and intangible features, such as reputation of faculty.[26]

The Office of Civil Rights (OCR) has promised that under the new regulations, it will critically examine cases in which the number of single-sex classes offered to one sex greatly outnumbers those offered to the other sex. The DOE, however, has expressed its intention to be lenient while these programs are being implemented over time.[27]

LEAs may use the above factors in their own required biennial self-evaluation. During these evaluations, LEAs must confirm that the single-sex program is based, not on stereotypes of the sexes, but on some genuine justification, and that the program is substantially related to the achievement of the important objective that first justified it.[28]

LEAs also may create stand-alone single-sex schools, as long as they provide *substantially equal* educational opportunities to students of the other sex.[29] The factors identified by the DOE as important to this determination mirror those given above to assess the evenhandness of single-sex classes and extracurricular activities. LEAs do not need to advance an important objective to justify the establishment of single-sex schools;[30] but if challenged, they will need to show that substantially equal educational opportunities are provided for the other sex.

The *evenhandedness* and *substantial equality* requirements are a far cry from the regime that prevailed before the new regulations. Under old Title IX regulations, single-sex educational programs were only legal when LEAs satisfied a *comparability* requirement: an LEA could not exclude any student from admission to a school unless it made available to the student courses, services, and facilities that were comparable.[31] Of course, comparability meant different things to different people; in fact, DOE's longstanding policy required that the comparable alternative also be a single-sex educational program.[32] The department adopted the "substantially equal" language and dropped the "substantially comparable" language in response to *United States v. Virginia*, which is discussed below.[33]

The following outline summarizes the changes in the Title IX regulations:

1. Single-sex classes and extracurricular activities are permissible if they are
   a. justified by an important governmental objective, which is defined to include
      i. educational diversity, and
      ii. service to the identified needs of particular students and are
   b. accompanied by substantially equal coeducational opportunities for students of the excluded sex.
2. Single-sex schools are permissible without an important governmental objective, as long as a substantially equal coeducational alternative is available to students of the excluded sex.

The U.S. Constitution

In discussing single-sex educational programs, DOE has stressed that "LEAs also should be aware of constitutional requirements. . . . LEAs may be challenged in court litigation on constitutional grounds."[34] Specifically, single-sex programs may run afoul of the Fourteenth Amendment's Equal Protection Clause, which provides that

> [n]o State shall make or enforce any law which shall abridge the privileges or immunities of citizens of the United States; nor shall any State deprive any person of life, liberty, or property, without due process of law; nor deny to any person within its jurisdiction the equal protection of the laws.

26. § 106.34(b)(3).
27. 69 Fed. Reg. 11276, 11281 (March 9, 2004).
28. § 106.34(b)(4).
29. § 106.34(c) (2006). This summary of major changes in the regulations comes largely from a U.S. Department of Education press release, "Secretary Spellings Announces More Choices in Single Sex Education Amended Regulations Give Communities," October 24, 2006, available at http://www.ed.gov/print/news/pressreleases/2006/10/10242006.html (last visited November 12, 2006).
30. This results from an anomaly in Title IX that specifically exempts admission processes of nonvocational public elementary and secondary schools from Title IX scrutiny. As far as the DOE is concerned, "[t]he Title IX regulations have permitted single-sex non-vocational schools since the regulations were issued in 1975." 71 Fed. Reg. 62530, 62540 (Oct. 25, 2006).
31. 34 C.F.R. § 106.35(b) (2004).
32. 67 Fed. Reg. 31101, 31103 (May 8, 2002).
33. 518 U.S. 515 (1996).
34. 67 Fed. Reg. 31101, 31103.

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Since 1973 the U.S. Supreme Court has used *intermediate scrutiny* when evaluating the constitutionality of governmental sex discrimination under the Equal Protection Clause.[35] While there is no precise definition of what this scrutiny entails, it requires a government program that discriminates on the basis of sex to serve an important governmental objective or to be based on an "exceedingly persuasive justification."[36]

Even when the government's reason for sex discrimination satisfies one of the above standards, the government also must show that the discrimination is substantially related to achieving the stated goal. Sexual discrimination is substantially related to a governmental goal—or "fits" with it—when it is based on actual differences between women and men, rather than on stereotypes or overbroad generalizations about the sexes. For example, the Court found that a law permitting women to buy certain kinds of alcohol at an earlier age than males was unconstitutional because sex was not an accurate enough indicator of the propensity to drink and drive.[37] In addition, the Court has found that laws cannot be motivated by the goal of subordinating one sex to another. Finally, the government must show that no sex-neutral solution can comparably serve the ends sought.

The two critical cases that have dealt with the issue of single-sex education under the intermediate scrutiny rubric concern postsecondary educational institutions: *United States v. Virginia* and *Mississippi University for Women v. Hogan*.[38] In *Virginia* the U.S. Supreme Court found that the Virginia Military Institute (VMI) could not exclude female students based on their sex; in *Hogan* it held that an all-female nursing school could not exclude a male student based on his sex.

United States v. Virginia. In 1990 a female student who was excluded from VMI, an all-male, state-supported college, sued the state of Virginia.[39] She was not alone in her desire to attend VMI. In 1988 and 1989, 347 female students had inquired about admission but were simply ignored. VMI maintained that admitting female students would undermine or undo its "adversative" training method, which is characterized by physical rigor and mental stress. At VMI, first-year students are referred to as "rats" and are subject to profound psychological degradation.

The Court conceded that this method creates an environment that would be unattractive to the vast majority of females but did not agree that women's presence would hinder the method. The Court found that generalizations about the tendencies of a particular sex must be given a "hard" look.[40] Ultimately, the Court held that VMI's policy violated the Equal Protection Clause because *some* female students could thrive at an adversative-method institution—as the existence of coeducational federal military academies proved.

The state had argued that a comparable program at Mary Baldwin College, open only to females, made VMI's all-male admission policy constitutionally permissible. Although the Court did not question the state's power to support—evenhandedly—diverse educational opportunities, it found that the program at Mary Baldwin was not substantially equal to VMI's. In the Court's opinion, Mary Baldwin would never attain VMI's "157-year history, the school's prestige, and its influential alumni network."[41] This statement indicates that the Court's decisions on cases involving single-sex schools or programs will focus on intangible as well as tangible factors.

Mississippi University for Women v. Hogan. In *Hogan* the Court found that an all-female nursing school could not exclude a male applicant who could not find a comparable opportunity to attend nursing school in his hometown. The university, historically a women-only institution, argued that that status should be protected because the school was created to "intentionally and directly assist . . . members of the sex that is disproportionately burdened."[42] The Court found that as women comprised more than 90 percent of the nurses in Mississippi and the nation, the need for remedial measures could not justify the university's sexually discriminatory admission policy. Remedial action, the Court said, must occur in response to real and documented disadvantage and then must be "directly related to its proposed compensatory objective."

Hogan is also important for another reason. In *Hogan* the university argued that it was exempt from Title IX because it was trying to make up for a history of underserving women in the field of professional education.[43] The Court flatly rejected this argument. The statutory and constitutional analyses are distinct; therefore any institution segregating students by sex must meet the requirements of both Title IX and the U.S. Constitution.

35. Frontiero v. Richardson, 429 U.S. 190 (1976).
36. *Virginia*, 518 U.S. at 529 (1996) (state-sponsored, male-only military college violated Equal Protection Clause); Denise C. Morgan, "Anti-Subordination Analysis after *United States v. Virginia*: Evaluating the Constitutionality of K–12 Single-Sex Public Schools," *University of Chicago. Legal Forum* (1999): 381.
37. Craig v. Boren, 429 U.S. 190 (1976).
38. 518 U.S. 515 (1996) (state-sponsored, male-only military college violated Equal Protection Clause); 458 U.S. 718 (1982) (State-sponsored, female-only nursing school violated the Equal Protection Clause.).
39. 518 U.S. at 522–23 (1996).
40. *Id*. at 541(citing Reed v. Reed, 404 U.S. 71 (1971)).
41. *Id*. at 525, 551.
42. 458 U.S. at 728.
43. *Id*. at 730–31.

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What These Cases Tell Us

Both *Hogan* and *Virginia* make it clear that the Supreme Court is skeptical about educational programs segregated by sex. However, as both cases involved only higher education, the Court might distinguish cases involving primary or secondary education. After all, the Court did (albeit in 1976 and in a sharply divided decision) uphold the constitutionality of a single-sex education program in a Philadelphia public school district.[44]

In addition, both *Hogan* and *Virginia* involved schools whose long histories of single-sex admissions belied their professed justifications for them, insofar as neither school had conducted recent evaluations to determine whether those justifications still held water. Further, in each case the Court found that even if the pedagogical motivations the institutions advanced were adequate, their single-sex admission policies were based on outdated and overbroad sex stereotypes unsupported by empirical evidence. Today, any LEA proposing a single-sex education program in primary or secondary schools would presumably present specific findings of a particular educational need and evidence that separation by sex is substantially related to fulfilling that need. Moreover, as most contested single-sex programs will be of recent creation, establishing that educational opportunities for both sexes are substantially equal should be easier than it was in *Hogan* and *Virginia*.

The first constitutional concern for educators planning a single-sex program is thus establishing an extremely persuasive, or important, governmental objective to justify it. In *Virginia*, the Court recognized that an educational method that was "pedagogically beneficial" might well constitute such an objective, though it found that Virginia had failed to produce evidence showing that VMI's adversative method was pedagogically beneficial. The Court also raised the possibility that diversity may be an important objective; it did not "question the State's prerogative [to] evenhandedly support diverse educational opportunities" and recognized that "diversity among public educational institutions can serve the public good."[45] The Court thus left open the possibility that, when school officials can show educational advantages for their students, single-sex programs can be constitutional.

In fact, the DOE sees the language about diversity in *Virginia* as an indirect endorsement of single-sex primary and secondary education. Therefore the changes to Title IX's regulation end the idea that remedial action is the only acceptable reason for allowing single-sex education. The regulations identify diversity of educational opportunities and the need to address specific educational needs as valid governmental objectives for establishing single-sex programs.

Even if pedagogical benefit or other similar justifications can constitute exceedingly persuasive governmental objectives, the means used to reach them must still be appropriate. For example, if an LEA presents evidence that girls are falling behind in math and boys in language arts, the LEA may still need to show that it has provided equal coeducational opportunities for those female and male students who do not reflect these differences. The establishment of single-sex educational programs alone may be considered an overly broad remedy.

Advice to LEAs Considering Single-Sex Classes, Activities, or Schools

An LEA considering the implementation of a single-sex educational program may want to consider the following steps and issues before moving ahead.

Contact an Attorney

Creating a single-sex school or classroom obviously involves gray areas of the law. Consultation with the attorney for the local board of education is a logical first step. In this time of regulatory change, school attorneys should consider the DOE or the Office of Civil Rights as the best resource for testing potential ideas for single-sex education.

Document Both Your Reasons and Actions Taken in Creating a Single-Sex Program

Even though Title IX's regulations have changed, the constitutional question remains. Any single-sex program—that is, school or classroom—must meet certain constitutional requirements. First, it must be designed to serve one of the important objectives discussed above; and should a dispute come to litigation, the LEA will need to provide evidence to show compliance. The Supreme Court is skeptical about justifications for a program created after litigation has begun and has stated that "[t]he justification must be genuine, not hypothesized or invented *post hoc* in response to litigation."[46] This means that the record must show sound reasons for having single-sex schools or classes.

Any single-sex program and its alternative must be substantially equal. An LEA must document the reason that a comparable single-sex opportunity was not provided to students of the excluded sex (if it was not provided). The reason might be, for example, that none of the students need

44. Vorcheimer v. Sch. Dist. of Phila., 532 F.2d 880 (3d Cir. 1975), *aff'd by equally divided Court*, 430 U.S. 703 (1977).

45. *Virginia*, 518 U.S. at 534 n.7, 535.

46. *Id*. at 530.

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a single-sex program or want one. A court will certainly find a program unconstitutional if there are opportunities at a school or in a class from which a student is excluded because of his or her sex.

Consider Costs

An LEA with a single-sex program must always have a substantially equal coeducational classroom or school. This can create a problem. Imagine, for example, a school that has two math teachers and sixty students evenly split between males and females. If half the girls want to join the single-sex class, one class would have fifteen girls and the remaining, coeducational class would have to have forty-five students. Such an imbalance in class size would mean that the classes are not substantially equal and that at least one more teacher and an additional classroom would be required. Recall also that the school, even under the proposed regulation, could not force more girls into the single-sex class to achieve numerical balance. For many schools or LEAs, the feasibility and logistics of all of these options may present difficult or insurmountable challenges.

Create Enthusiasm for the Project Among the School Community

Remember that most of the above legal issues arise, and become messy, when an unhappy member of the school community contacts the DOE. LEAs therefore should involve parents in the planning stages of a single-sex program by asking them what they think about such a program and why. Before implementing a single-sex program, school officials might send around a letter explaining why the program is set up the way it is—for example, pointing out that boys are performing significantly less well than girls in language arts, so they will have a single-sex class. Finally, once the program is up and running, parents and students should be told about their choices, as well as what measures are being taken to address issues of evenhandedness and substantial equality. ■

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