TABLE 2. Other Interscholastic Athletic Eligibility Decisions

Case	Forum year	Rule/ Policy	Waiver clause	Sport	IEP/ 504 plan	IDEA	Section 504	ADA	Prevailing party
Maximum participation rules									
Frye v. MI Athletic Ass'n.	6th Cir. 1997	8 semester	Yes	Basketball	No		Rule is essential & waiver is an undue burden	Individualized analysis based on rule's purpose	Athletic association/ district
McPherson v. MI High Sch. Athletic Ass'n.	6th Cir. 1997	8 semester	Yes	Basketball	No		Rule is essential & waiver is an undue burden	Previous waiver sufficient	Athletic association/ district
Rhodes v. OH High Sch. Athletic Ass'n.	N.D. Ohio 1996	8 semester	Yes	Football	No		Rule is not based on disability	Rule is not based on disability	Athletic association/ district
J.M. v. MT High School. Ass'n.	Mont. 1996	8 semester	Yes	Football & wrestling	No	If IEP includes participation, then protected			Athletic association/ district
Academic eligibility rules-policies									
Hoot v. Milan	E.D. Mich. 1994	Minimum credits	Yes	Football	No				Student
Susquehana Township (PA) Sch. Dist.	OCR 1993	Minimum credits/ no pass-no play	No	Football	No		Rule is not based on disability	Rule is not based on disability	Athletic association/ district
Paired-organ									

decisions									
Grube v. Bethlehem Area Sch. Dist.	E.D. Pa. 1982	Paired-organ (kidney)		Football	No		>Conflicting medical opinions insufficient justification		Student
Poole v. Plainfield Bd. of Educ.	D. N.J. 1980	Paired-organ (kidney)	No	Wrestling	No		Medically supported decision of parent overrules board		Student
Kampmeier v. Nyquist	2d Cir. 1977	Paired-organ (eye)	No	Contact sports	No		>Conflicting medical opinions insufficient justification		Athletic association/ district