

Player Safety in Youth Sports: Sportsmanship and Respect As an Injury-Prevention Strategy

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I. INTRODUCTION

The night was November 3, 1999, and the final seconds were ticking down in a junior varsity hockey game between bitter local rivals, New Trier High School and Glenbrook North High School, at the Rinkside Sports Ice Arena in the Chicago suburb of Gurnee. New Trier was comfortably ahead, 7-4, in the teams' first encounter since Glenbrook North had edged them, 3-2, for the Illinois state junior varsity title a season earlier.¹ Junior varsity contests do not normally provide lasting memories in any sport, but this early-November game would be different.

The early-November rematch painted a grim picture. “[V]iolence flared repeatedly as the mood grew ugly” from the opening faceoff,² and eyewitnesses later described “an intense battle”³ as each team’s parents and students taunted rival fans and players.⁴ Players themselves traded taunts and squared off in altercations unrestrained by their coaches,⁵ the leaders recognized by pediatric professionals as “the most important individual[s] for maintaining safety” in youth leagues.⁶ One coach reportedly even left the bench and strode onto the ice during the game to

¹ Megan O’Matz, *Teen Charged With Battery in Hockey Hit: Intent to Injure Is Cited: Foe Paralyzed From Check*, CHI. TRIB., Dec. 8, 1999, at 1; Scott Stewart, *Emotions High Before Hockey Tragedy*, CHI. SUN-TIMES, Dec. 9, 1999, at 1.

² Associated Press, *Hockey Charge Reduced: No Contest: Illinois Prep Enters Plea*, TELEGRAPH-HERALD (Dubuque, Ia.), Aug. 8, 2000, at B1

³ Debbie Howlett, *Teen May Face Trial In Sports Injury*, USA TODAY, May 5, 2000, at 3A.

⁴ Associated Press, *Hockey Charge Reduced*, *supra* note 2, at B1; see also, e.g., Scott Stewart, *supra* note 1, at 1; Debbie Howlett, *supra* note 3, at 3A.

⁵ Scott Stewart, *supra* note 1, at 1; Richard Roeper, *Decatur Fight Child’s Play Next to Hockey Violence*, CHI. SUN-TIMES, Dec. 13, 1999, at 11.

confront a referee.⁷ The Glenbrook North coach allegedly “rallied his players to take special action” against New Trier’s 15-year-old sophomore co-captain Neal Goss, whose three goals helped seal the victory.⁸ The referees called sixteen penalties,⁹ a particularly high number for a junior varsity hockey game.

At the final buzzer ending the contest or within a second or two afterwards, a 15-year-old Glenbrook North player skated full speed across the ice, blind-sided Goss, and body-checked him head-first into the boards.¹⁰ “That’s what you get for messing,” the player allegedly said as Goss lay prone on the ice, permanently paralyzed from the neck down.¹¹

Neal Goss’ catastrophic spinal cord injury introduces my two conclusions, drawn from my experiences as a lawyer for thirty-five years, and as a volunteer youth-league and high school hockey coach concerned about player safety for more than forty. Both conclusions concern injury prevention, the first obligation of parents and coaches who conduct and supervise games for the estimated twenty-five to thirty million boys and girls who participate in organized sports leagues each

⁶ Charles H. Tator et al., *Spinal Injuries in Canadian Ice Hockey: An Update to 2005*, 19 CLIN. J. SPORT MED. 451, 455 (2009).

⁷ *Locking Juvenile Up Piles One Tragedy Atop Another*, STATE J.-REGISTER (Springfield, Ill.), Dec. 10, 1999, at 31.

⁸ Megan O’Matz, *Hockey Suit Detailed: Family Seeks Damages*, CHI. TRIB., Dec. 9, 1999, at 1.

⁹ Rummana Hussain, *Probation For Teen Who Delivered Hockey Hit*, CHI. TRIB., Oct. 27, 2000, at 1.

¹⁰ Tony Gordon, *Plea Deal Ends Emotional Hockey Case*, CHI. DAILY HERALD, Aug. 8, 2000, at 1; Debbie Howlett, *supra* note 3, at 3A.

¹¹ Dirk Johnson, *Hockey Player, 15, Is Charged After Seriously Injuring a Rival*, N.Y. TIMES, Dec. 9, 1999, at A21; Megan O’Matz, *Hockey Suit Detailed*, *supra* note 8, at 1.

year.¹²

First, we should not exaggerate the law's role in preventing avoidable injury to "youth leaguers" -- players in sports events conducted by public or private schools, private organizations, or public agencies such as parks and recreation departments. Americans often look to the law for enforceable standards to help govern personal behavior, but (as Part II of this article discusses) the law provides youth leaguers only limited protection because the legal process is essentially reactive and not proactive. A civil damage action and a criminal prosecution followed quickly from Neal Goss' injury, but neither proceeding did anything to prevent lifelong paralysis.

Second, the protection afforded by national safety standards established by safety experts -- equipment designers, physicians' groups, and youth sports governing bodies – is similarly limited because (as Part III of this article discusses) parents and coaches behaving irresponsibly can neutralize these standards and put the players in harm's way in a few moments. Protective equipment is designed and playing rules are conceived with sound medical advice at the national level, but young athletes wear equipment and compete at the local level.

For years now, national youth sports governing bodies (USA Hockey, US Youth Soccer, the American Youth Soccer Organization, and others) have influenced

¹² See, e.g., TOM FARREY, GAME ON: THE ALL-AMERICAN RACE TO MAKE CHAMPIONS OF OUR CHILDREN 16 (2008); Glyn Roberts, *Motivation in Sport: Understanding and Enhancing the Motivation of Children*, HANDBOOK OF RESEARCH ON SPORT PSYCHOLOGY, 405, 411 (Robert N. Singer et al. eds., 1993).

local behavior through adult-education programs that emphasize sportsmanship and mutual respect among competitors and their families. Posters, videos, DVDs, brochures, website entries and similar materials provide the framework for mandatory parent meetings often conducted by local leagues or teams, usually during the pre-season period.

For good reason, these materials typically cast parents and coaches as role models for the players they raise and supervise. Youth leaguers are not born with attitudes about sportsmanship and respect but, like other children, learn what they watch over time. They react not only to media reports of excesses in professional sports, but also to the verbal and non-verbal cues passed by their parents and coaches, the most influential adults in their athletic lives. Adults carefully watch the children as they play organized sports, but children also watch the adults.

Sportsmanship and mutual respect indeed teach children citizenship, but they do much more than that. Adherence to sportsmanship and mutual respect can also help prevent many avoidable injuries that may disrupt and even devastate the lives of young athletes and their families. If adults committed to these two virtues had guided the New Trier-Glenbrook North JV hockey game, Neal Goss would likely have walked out of the rink that night because sportsmanlike, respectful teens trained by responsible adults do not blind-side opponents and drive their heads into the ground at the end of a game.

From my years of coaching, I sense that adult-education materials created by

national youth sports governing bodies do successfully influence many adults to embrace sportsmanship and respect. More work, however, needs to be done. According to a 2010 poll conducted in twenty-two nations by Reuters News and the market research company Ipsos, parents in the United States still rank as the world's "worst behaved" parents at children's sports events.¹³

As they seek new ways to influence adult attitudes, youth sports governing bodies should combine the time-tested and assuredly valuable citizenship-based "role model" message with safety-based messages that prominently and directly identify sportsmanship and respect as an injury-prevention strategy. When sportsmanship and respect prevail, children striving to win are less likely to suffer injury.

New safety-based messages may strike a receptive chord by reminding parents and coaches that danger does not discriminate. Neal Goss was simply in the wrong place at the wrong time, a victim of an opponent's impetuous violence. The victim lying paralyzed on the ice at the end of the New Trier-Glenbrook North hockey game could have been any parent's child because the volatility that adults encouraged or tolerated throughout the contest had already deprived every player of the safety provided by protective equipment and carefully-crafted national safety standards.

Because avoidable injury arising from local abandonment of sportsmanship

¹³ ABC News, *U.S. India Parents Seen as Worst Behaved at Kids' Sports* (Apr. 10, 2010).

and respect so often strikes youth leaguers at random, maintaining safety during games and practice sessions remains every family's concern. Part III discusses why adult-education materials that now stress citizenship but draw a link to safety only in passing, if at all, should be recast to sensitize parents and coaches to a straightforward formula: *Sportsmanship + Respect = Safety*.

II. THE LAW'S LIMITED ROLE IN INJURY PREVENTION

"If your only tool is a hammer," the old saying goes, "all your problems will look like nails."¹⁴ Because the litigation model dominates law school curricula, lawyers sometimes spend their entire careers reflexively viewing accidents and other significant problems as potential lawsuits destined for the courtroom.¹⁵ Non-lawyers also tend to visualize civil or criminal trials as the tools of choice because most Americans develop their impressions of the legal system from watching television law dramas or from serving jury duty.¹⁶

The law's role in promoting youth leaguers' safety, however, can be overstated. Lawyers, economists and other commentators participating in the national "tort reform" debate disagree about the capacity and propriety of negligence law to influence corporate and individual conduct before injury occurs,

<http://abcnews.go.com/US/wireStory?id=10305884> (Feb. 6, 2011).

¹⁴ CHARLES POLLARD, RESTORATIVE JUSTICE AND CIVIL SOCIETY 165 (Heather Strang & John Braithwaite eds., 2001).

¹⁵ See, e.g., Jean Sternlight, *Competing and Complementary Rule Systems: Civil Procedure and ADR: Separate and Not Equal: Integrating Civil Procedure and ADR in Legal Academia*, 80 NOTRE DAME L. REV. 681, 688-89 (2005).

¹⁶ See Douglas E. Abrams, *Picket Fences*, in PRIME TIME LAW: FICTIONAL TELEVISION AS LEGAL NARRATIVE 129, 141 (Robert M. Jarvis & Paul R Joseph eds., 1998).

and then to compensate victims afterwards.¹⁷ Without entering that debate, it seems clear that civil damage actions can only compensate youth-leaguers such as Neal Goss for injuries that have already occurred, often with a third or more of the recovery after settlement or trial going to the plaintiff's lawyer under the contingent-fee retainer agreements common in personal injury suits.¹⁸ For its part, criminal prosecutions can only punish wrongdoers for inflicting prior injuries.

Prevention remains the most child-protective strategy because litigation cannot necessarily make the injured youth leaguer's life good; the most it can often do is make that life less bad.

A. *Premises Liability*

The law's impact on youth leaguers' safety begins with "premises liability," the obligation of owners or managers to assure that safe conditions mark fields, gymnasiums or similar venues.¹⁹ The prospect of negligence liability may help prevent some injuries by encouraging greater safety measures from the school districts, parks and recreation departments, and other public agencies and private businesses that manage these venues. Professionals heading these providers are more likely than many other lay persons to be familiar with legal proceedings, and to retain lawyers and insurance risk managers who understand that potholes, poor lighting, rotted benches and similar hazards invite litigation, much of it avoidable

¹⁷ See generally Kenneth S. Abraham, THE FORMS AND FUNCTIONS OF TORT LAW (3d ed. 2007).

¹⁸ See ABA Model Rules of Professional Conduct, Rule 1.5(c), (d) (fees).

or made less costly by exercising reasonable care and foresight.

Settlements or judgments after trial in premises liability suits following youth sports injuries are certainly not unknown, and it may be difficult or impossible to deter a plaintiff's lawyer from filing suit against owners or managers even with weak evidence. In more than forty years, however, I cannot recall ever coaching a youth hockey game in an ice rink that appeared unsafe or genuinely contributed to an injury. No media report, and no later allegation in the civil or criminal filings, suggested that conditions at the Rinkside Sports Ice Arena had anything to do with the injury that confined Neal Goss to a wheelchair, unable ever again to walk or care for his daily needs.

B. National Safety Standards

What about potential negligence liability based on the quality of protective equipment, or on the sufficiency of playing rules established by national youth sports governing bodies? These national safety standards remain central in contact or collision sports such as hockey or football, but these sports hold no monopoly on injuries – or lawsuits.

Concern about negligence liability doubtlessly influences engineers who design protective equipment and national youth sports governing bodies that establish and periodically refine playing rules. Decisionmakers act not only from

¹⁹ Concerning premises liability, see generally, e.g., WALTER T. CHAMPION, JR., FUNDAMENTALS OF SPORTS LAW §§2.6, 7.1 to 7.5, at 60-65, 161-86 (2d ed. 2004); GLENN M. WONG, ESSENTIALS OF SPORTS LAW § 4.5, at 122-26 (4th ed. 2010).

genuine desire to prevent injury, but also because they know that their organizations typically have “deep pockets” that attract plaintiffs’ lawyers seeking damages.

In my own sport, USA Hockey’s steady march toward more protective safety standards since I first laced on skates nearly fifty years ago has undoubtedly spared many youngsters avoidable injury. Nobody questioned that Neal Goss wore a helmet, face cage and other protective equipment that met USA Hockey safety specifications. Nobody questioned the sufficiency of these specifications. Regardless of whether the performance of the coaches or referees during the New Trier-Glenbrook North game met minimum expectations for responsible adult leadership, no report indicated that any coach or referee had evaded or failed USA Hockey’s nationally-mandated criminal or child abuse background checks, or lacked the classroom training certification required of coaches and officials.

Nor was negligence evident in USA Hockey’s national playing rules, which provide penalties for both “checking from behind” and “cross-checking,” the particular violations evidently used by Neal Goss’ opponent to deliver his blow at the end of the game.²⁰ Media reports indicated that the Glenbrook North player who blind-sided Neal Goss received a penalty for checking-from-behind and a 30-day

²⁰ See USA HOCKEY, THE OFFICIAL RULES OF ICE HOCKEY, R. 607 (checking from behind), R. 608 (cross checking; a cross-check is “a check delivered with both hands on the stick and no part of the stick on the ice”) (2009).

suspension pending a hearing before state amateur hockey officials.²¹

C. The Legal Process

With the sufficiency of USA Hockey national safety standards not in issue, the law reacted to Neal Goss' life-changing injuries as best it could. Concluding that the blind-side hit occurred seconds after the buzzer ending the game while Goss was skating to his team's bench to celebrate the victory, the state prosecutor charged the opponent with two felony counts of aggravated battery, one alleging great bodily harm and the other alleging use of the hockey stick as a deadly weapon.²² The opponent (who remained unnamed by the media because he was a minor) entered a negotiated no-contest plea to one count of simple misdemeanor battery.²³ The juvenile court judge sentenced him to two years' probation, 120 hours of community service at a facility for paralyzed patients, and a prohibition from playing contact sports while on probation.²⁴

Facing lifetime costs for medical and around-the-clock personal care, Neal Goss and his family filed a multimillion-dollar civil damage action alleging that five defendants negligently failed to maintain control during the game – the Glenbrook North opponent; the Glenbrook North coach; the Illinois Hockey Officials

²¹ Cornelia Grumman, *Gurnee Cops Investigating Hockey Hit Against Teen: New Trier Player to Undergo Surgery*, CHI. TRIB., Nov. 9, 1999, at 1.

²² Megan O'Matz, *Teen Charged With Battery in Hockey Hit*, *supra* note 1, at 1; Jon Sall, *Hockey Player, 15 Charged: Opponent Partially Paralyzed*, CHI. TRIB., Dec. 8, 1999, at 3.

²³ Rummana Hussain, *Plea Agreement For Hockey Player In Cross-Checking*, CHI. TRIB., Aug. 8, 2000, at 1. See generally *North Carolina v. Alford*, 400 U.S. 25 (1970) (defendant entering a no-contest plea maintains that he or she is not guilty but concedes that prosecutors may have enough evidence to convict).

²⁴ Rummana Hussain, *Probation For Teen Who Delivered Hockey Hit*, *supra* note 9, at 1.

Association; the Northbrook Hockey League, which sponsored the Glenbrook North team; and the Amateur Hockey Association of Illinois.²⁵ The parties reached private settlements in the civil suits.²⁶

III. THE CENTRAL ROLES OF SPORTSMANSHIP AND RESPECT IN INJURY PREVENTION

The short of the matter is that national safety standards fashioned by equipment designers and USA Hockey did not fail Neal Goss, and neither did the legal process that played catch-up after the game. Players on both teams were left vulnerable instead by rabid local adults who, by letting the game get out of hand and abandoning effective control, neutralized the national standards that were designed to prevent injury.

In adult-education materials produced for local parents and coaches, national youth sports governing bodies should now explicitly link sportsmanship and respect with player safety. A simple analogy demonstrates the need for this link.

In purpose and form, a sport's rulebook resembles the legislation found in the statute books that influence other aspects of our daily lives. "The life of the law," said former Harvard Law School Dean Roscoe Pound, "is in its enforcement."²⁷ Pound meant that achieving a statute's protective purpose depends on responsible public and private enforcement because words on paper, by themselves, protect no one and statutes do not apply themselves. A youth sport's playing rules similarly

²⁵ Megan O'Matz, *Hockey Suit Detailed*, *supra* note 8, at 1.

²⁶ Lisa Black & Susan Berger, *Turning Tragedy Into Victory*, CHI. TRIB., Jan. 4, 2007, at 1.

²⁷ Roscoe Pound, *Mechanical Jurisprudence*, 8 COLUM. L. REV. 605, 619 (1908).

are merely words on paper, and achieving their protective purpose depends on parents, coaches, officials and league administrators who remain committed to injury prevention by responsibly enforcing standards of sportsmanship and respect.

A. *Prevention Strategies in the Upbringing of Children*

1. Existing Prevention Strategies in American Life

Youth sports adult-education materials that stress sportsmanship and respect as an injury-prevention strategy would follow a familiar path. A wide range of public and private prevention strategies already enlist adults to protect children from conduct dangerous to themselves or others by intervening before that conduct occurs, rather than by reacting only afterwards.

Organized after-school activities and other rigorously evaluated prevention programs, for example, enable adults to help reduce rates of juvenile delinquency, conduct by minors that would be a crime if committed by an adult.²⁸ Researchers have also demonstrated the effectiveness of classroom curricula that enable teachers to help prevent violence and bullying in the nation's elementary and secondary schools.²⁹

Like these and other juvenile prevention programs already in place, initiatives that link sportsmanship and respect to player safety will not short-circuit

²⁸ See, e.g., PETER W. GREENWOOD, CHANGING LIVES: DELINQUENCY PREVENTION AS CRIME-CONTROL POLICY 49-83 (2006).

²⁹ See, e.g., Douglas E. Abrams, *A Coordinated Public Response to School Bullying*, in OUR PROMISE: ACHIEVING EDUCATIONAL EQUALITY FOR AMERICA'S CHILDREN 399 (Maurice R. Dyson & Daniel B. Weddle eds., 2009).

all unfortunate incidents. Juvenile prevention programs achieve success through reduction, not perfection. Reduction -- motivating much of the targeted audience to behavior modification -- remains a realistic and worthwhile goal when the unpalatable alternative would be toleration of unacceptably high rates of incidents that most people would find undesirable.³⁰

2. A New Injury-Prevention Strategy for Youth Sports

a. *The existing framework*

Parents and coaches learning for the first time about Neal Goss' tragedy might feel tempted to dismiss his paralysis as extraordinary, and thus not a meaningful predicate for sustained safety-based prevention initiatives in youth sports generally. The adult disdain for sportsmanship and respect, and the disregard for player safety, that marked the New Trier-Glenwood North hockey game, however, helped produce consequences that remain extraordinary only in their severity.

Sports medicine specialists and other pediatric professionals commonly link sportsmanship and respect to player safety. The "Safety Checklist" provided by the National Athletic Trainers Association, for example, urges this generally applicable injury-prevention strategy: "Coaches should strictly enforce the sports rules," and leagues should 'Develop a sports/parent 'code of conduct.' Always show good

³⁰ *Id.* at 411.

sportsmanship.”³¹

A provocative 2008 study conducted by the Center for Injury Research and Policy at Nationwide Children’s Hospital underscores how local adherence to a youth sport’s national playing rules enhances player safety.³² The study estimated that between 2005 and 2007, more than 98,000 injuries in nine high school sports (boys’ football, soccer, basketball, wrestling and baseball; and girls’ soccer, volleyball, basketball and softball) were directly related to an act that a referee, official or disciplinary committee ruled illegal.³³ Thirty-two percent of these injuries were to the head or face, and 25% were concussions.³⁴

“Each sport has a unique set of rules developed to promote fair competition and protect participants from injury,” the Children’s Hospital researchers concluded. “[E]nforcing rules and punishing illegal activity is a risk control measure that may reduce injury rates by modifying players’ behavior.”³⁵

The overheated New Trier-Glenbrook North hockey game demonstrates that, as the Children’s Hospital researchers suggest, adherence to sportsmanship and respect helps assure youth leaguers’ safety by promoting competition within the letter and spirit of playing rules developed over time. Paralysis or other catastrophic injuries are indeed thankfully rare, but observers continue to report

³¹ See, e.g., National Athletic Trainers Ass’n, *Sports Safety Checklist to Help Prevent Common Athletic Injuries* 2, 5, <http://www.nata.org/youthsports/NATAchecklist9.pdf> (Feb. 2, 2011).

³² See Christy Collins et al., *When the Rules of the Game Are Broken: What Proportion of High School Sports-Related Injuries Are Related to Illegal Activity?*, 14 INJURY PREVENTION 34, 34 (2008).

³³ *Id.* at 34.

³⁴ *Id.* at 36.

“innumerable cases . . . throughout the country every month . . . of games turning tragic at the hands of enraged parents”³⁶ during brawls and similar encounters, and in post-game handshake lines.³⁷ “Waves of head-butting, elbowing and fighting have been reported at youth sporting events across the country.”³⁸ With adult excesses disturbingly common in youth sports, it is not unreasonable to think that for every reported avoidable injury, other such injuries never reach the media.

The commonness of adult excesses in youth sports is underscored by the 2010 poll that, as cited in this article’s Introduction, Reuters News and the market research company Ipsos jointly conducted in twenty-two nations. The poll ranked parents in the United States as the world’s “worst behaved” parents at children’s sports events.³⁹ Sixty percent of U.S. adults who had attended youth sports contests reported that had seen parents become verbally or physically abusive toward coaches or officials; runners-up were parents in India (59%), Italy (55%), Argentina (54%), Canada (53%) and Australia (50%).⁴⁰

“It’s ironic that the United States, which prides itself in being the most

³⁵ *Id.* at 34.

³⁶ Gwen Morrison, *Parent Rage in Youth Sports: Giving the Game Back to Our Children*, <http://www.psychologyofsports.com/guest/parentrage.htm> (Feb. 8, 2011).

³⁷ See, e.g., Mike Peters, *Coaches and Players Suspended After Youth League Brawl*, GREELEY TRIB. (Colo.), Apr. 10, 2010; Douglass Dowty, *Charges Filed In Fight At Camillus Youth Game: All 8 Banned From Further League Participation*, POST STANDARD (Syracuse, N.Y.), Feb. 23, 2010, at A3; Tom Quigley & Sarah M. Wojcik, *Man Charged in Fracas During Mat Competition*, EASTERN EXPRESS TIMES (Pa.), Feb. 2, 2010, at A1; Abby Sewell, *Officials Move Forward After Youth Football Brawl*, DESERT DISPATCH (Barstow, Cal.), Oct. 23, 2008.

³⁸ Michael S. James & Tracy Ziemer, *Are Youth Athletes Becoming Bad Sports: With Cues From Adults, Are Kid Athletes Becoming More Aggressive?*, Aug. 8, 2000, <http://abcnews.go.com/Sports/story?id=99665> (Feb. 8, 2011).

³⁹ ABC News, *U.S., India Parents Seen as Worst Behaved*, *supra* note 13.

civilized country in the world, has the largest group of adults having witnessed abusive behavior at children's sporting events," said an Ipsos senior vice president.⁴¹

The Reuters/Ipsos poll confirmed earlier estimates of adult excesses. In a Survey USA poll in Indianapolis, Indiana, for example, 55% of parents said that they had seen other parents engaging in verbal abuse at youth sporting events, and 21% said that they had seen a physical altercation between other parents.⁴² In a Minnesota Amateur Sports Commission survey of youth leaguers, 45.3% of the athletes said that adults had called them names, yelled at them, or insulted them while they were playing in a game; 21% said that they had been pressured to play with an injury; 17.5% said that an adult had hit, kicked or slapped them during a game; and 8.2% said that they had been pressured to harm others intentionally.⁴³

The National Alliance for Youth Sports estimates that about 15% of youth league games see a confrontation between parents or coaches and officials, and a national summit on Raising Community Standards in Children's Sports concluded that youth sports is a "hotbed of chaos, violence and mean-spiritedness."⁴⁴ In a survey conducted by *Sports Illustrated For Kids* magazine, 74% of youth athletes reported that they had watched out-of-control adults at their games; 37% of the

⁴⁰ Four In 10 (37%) Global Citizens Have Been To Children's Sports Events (Apr. 7, 2010), <http://www.marketwire.com/press-release/Four-In-10-37-Global-Citizens-Have-Been-To-Childrens-Sports-Even-1143748.htm> (Feb. 6, 2011).

⁴¹ ABC News, *U.S., India Parents Seen as Worst Behaved*, *supra* note 13.

⁴² Gwen Morrison, *supra* note 36.

athletes had watched parents yelling at children, 27% had watched parents yelling at coaches or officials, 25% had watched coaches yelling at officials or children, and 4% had watched violence by adults.⁴⁵

Linking cause and effect in sports can be an imprecise art, but precise proof is not necessarily a prerequisite for initiatives designed to improve the circumstances of youth athletes. These consistent poll and survey numbers give ample reason to sense a continuing relationship between adult behavior and player safety even where the avoidable injuries would not approach the severity of Neal Goss'.

On the first anniversary of the fateful New Trier-Glenbrook North game, a veteran hockey referee said that "nothing" had changed in Chicago-area high school hockey.⁴⁶ "It's just as bad as it ever was," the referee concluded. "There's kids being carried off the ice every night. "You have parents acting like animals in the stands, coaches acting like animals on the bench . . . "[b]ut when their kid gets hurt, they can't figure out why."⁴⁷

b. *The outlook for the future*

As a longtime youth-league coach, I remain confident that thoughtful adult-

⁴³ FRED ENGH, WHY JOHNNY HATES SPORTS 5, 140 (1999).

⁴⁴ JIM THOMPSON, THE DOUBLE-GOAL COACH 5 (2003).

⁴⁵ Buzz Bissinger, *Bench the Parents*, N.Y. TIMES, Aug. 23, 2008, at 4A; Doug Wrenn, *Violent Parents – The New Contact Sport*, MAGIC CITY (ME.) MORNING STAR, Feb. 19, 2007, http://www.magic-city-news.com/Doug_Wrenn_44/Violent_Parents_-_The_New_Contact_Sport7433.shtml (Feb. 2, 2011); see also Survey: *Parents Believe Rash of Adult Violence at Youth Sporting Events Requires Nationwide Solution*, PRNewswire, Mar. 19, 2003 (survey of adults and players conducted by *SportingKid* magazine; more than 84% of respondents reported that they had watched parents acting violently (shouting, berating, or using abusive language) toward children, coaches or officials during youth sporting events).

⁴⁶ Barry Rozner, *One Year After a Hockey Tragedy, What Has Changed?*, CHI. DAILY HERALD, Nov. 3, 2000, at 1.

education materials would lead many – though certainly not all -- parents and coaches to link sportsmanship and respect to player safety. At one end of the spectrum, some adults will likely continue to resist messages urging sportsmanship and respect, including safety-based messages.⁴⁸ At the other end, some adults need no reminders about sportsmanship and respect because the two virtues already define their lives. In the vast middle, however, are parents and coaches who remain unsure about how to behave, perhaps from their own inexperience in youth sports because their own children have just began playing.⁴⁹

Before and during the New Trier-Glenbrook North hockey game, responsible adult enforcement of national safety standards could have scripted a happier ending. As game day approached, however, no adult sought to cool tempers and prepare for a spirited, yet sportsmanlike contest. All that the adults needed to do was to listen to their children because taunting, trash talking, and threats of violence do not arise for the first time by spontaneous combustion when players arrive at the game. As the game itself spiraled out of control for an hour or more, no adult in the rink – no parent, coach, referee or league administrator – had the ethical compass, emotional strength, or common sense to stop the game, deliver a

⁴⁷ *Id.*

⁴⁸ See, e.g., Bill Wells, *Zealous Parents Troubling*, THE REPUBLICAN (Springfield, Mass.), Mar. 7, 2010, at B8 (“75 percent of all people involved in youth sports are quality, first-rate people . . . 5 percent are just nuts . . . 20 percent consists of good people . . . [b]ut when it comes to youth sports, something happens. Something gets triggered.”); Patrick Connolly, *Spoil Sports: Whether They’re Yelling at Coaches, Arguing With Referees or Giving Pointers*, TENNESSEAN, May 6, 2000, at 1D (quoting Fred Engh, president of the National Alliance for Youth Sports, who estimated that the number of problem youth sports parents has increased from about 5% to about 15%).

⁴⁹ Douglas E. Abrams, *Lessons From the “Hockey Dad” Trial*, SAN DIEGO UNION-TRIB., Jan. 16, 2002, at B11.

public address announcement requesting calm, instruct the players to regain their composure, or take any other steps to move the teams back from the brink before it was too late.

The enduring lesson of the New Trier-Glenbrook North donnybrook is that when local adults compromise sportsmanship and mutual respect by letting the “hot blood of emotions” get the better of them,⁵⁰ the adults compromise the capacity of national safety standards to protect the safety of youth athletes. When safety-based adult education induces parents and coaches to do better, every injury prevented will spare some youth leaguer short-term disability, long term distress, or both. Players and families spared this damage will be much better off, even though they may never know of their good fortune. “An ounce of prevention,” taught Benjamin Franklin, “is worth a pound of cure.”⁵¹

B. *Crafting Safety-Based Prevention Messages Grounded in Sportsmanship and Respect*

Where do we go from here? As they design and disseminate adult-education materials, national youth sports governing bodies often engage marketing, media and public relations professionals to produce effective messages in hard copy brochures or DVDs, on league websites, or on posters displayed at the fields and other venues where children play organized sports. Messages linking sportsmanship

⁵⁰ BOB BIGELOW ET AL. JUST LET THE KIDS PLAY xii (2001).

⁵¹ See Benjamin Franklin, BENJAMIN FRANKLIN’S GAZETTE, Jan. 28-Feb. 4, 1735, at 1, *quoted and explained*, In re Lower Merion Township Fire Dep’t Labor Standards Litig., 972 F. Supp. 315, 320-21 (E.D. Pa. 1997).

and respect to player safety present special opportunities because they would require only recasting messages that these governing bodies already use.

1. Sportsmanship

Effective safety-based messages would recognize that embracing sportsmanship from the relative security of a keyboard, speaker's podium, or pre-season parents meeting takes only words, which can come easily because they carry no consequences. Maintaining sportsmanship while watching games from the stands, directing the team from the bench, or playing on the field can be much tougher because impulses toward self-restraint clash with equally strong (and sometimes stronger) passion to win.

The clash is real because maintaining sportsmanship with the scoreboard lit depends on willpower (as President Abraham Lincoln put it on the eve of the Civil War) to overcome passion and heed “the better angels of our nature.”⁵² In a national sports culture that values winning, rewards winners, and sometimes views winners as “good people” and losers as “bad people,”⁵³ living up to Lincoln’s admonition remains a tall order.

Effective safety-based adult-education materials would acknowledge what every athlete and youth sports parent and coach knows – that winning is preferable to losing. Wanting to win is a perfectly natural impulse, and indeed defines the

⁵² Abraham Lincoln, *First Inaugural Address* (Mar. 4, 1861), in SPEECHES AND WRITINGS, 1859-1865, at 215, 224 (Library of Am. ed. 1989).

essence of sportsmanship at any age and at any level of amateur or professional play. The integrity of sport depends on competitors who each care about the scoreboard. Athletes unconcerned about the score should not play because they deny their opponents the spice that comes from physically and emotionally invigorating competition.

Effective safety-based appeals for sportsmanship would also recognize, however, that the integrity of sports depends on each player's resolve to pursue victory within the rules, and then to shake hands with the opponent and accept the outcome gracefully, win, lose or draw. The British Association of Coaches has it right: "Sport without fairplay is not sport and honours won without fairplay can have no real value."⁵⁴

2. Respect

Even if Neal Goss had emerged unscathed that cold November night, the suburban Chicago hockey game brought no honor (or, as the British say, "honour") to anyone in the ice rink because the game proceeded without the cornerstone of sportsmanship – respect.

By tolerating and indeed encouraging trash talking and physical confrontations, the hockey players and their families did not live up to the aspiration, often stated by amateur and professional athletes alike, to "respect the

⁵³ Bernie Schock, PARENTS KIDS AND SPORTS 31-32 (1987); *see also, e.g.*, Thomas Tutko & William Bruns, WINNING IS EVERYTHING AND OTHER AMERICAN MYTHS 8 (1976) (describing positive characteristics attributed to winners and negative characteristics attributed to losers).

⁵⁴ THE GROWING CHILD IN COMPETITIVE SPORT 8 (Geof Gleeson ed., 1986) (quoting the BAC).

game” by playing or rooting hard while trying their best to win within the rules.⁵⁵ “Respect the game” has almost become a term of art, and indeed was the title of Ryne Sandberg’s acceptance speech when the Chicago Cubs second baseman was inducted into the Baseball Hall of Fame in 2005.⁵⁶

The New Trier and Glenbrook North hockey players also did not respect their opponents as fellow competitors entitled to a hard, spirited contest. The players did not respect their families or themselves by playing clean. Parents, coaches and league administrators did not respect one another or the players by maintaining proper decorum in the stands and on the benches.

Collective disrespect endangered every New Trier and Glenbrook North player, even ones who played within the rules that night. Because local breakdowns in sportsmanship and respect bring shared risk on the field, Crash Davis (Kevin Costner) spoke wisdom in the award-winning movie, *Bull Durham*: “You don’t respect the game, and that’s my problem.”⁵⁷

3. Building on Existing Citizenship-Based Messages

⁵⁵ See, e.g., *Wells' Bat Quiets the Boobirds*, TORONTO STAR, Apr. 13, 2010, at S5 (quoting Toronto Blue Jays outfielder Vernon Wells; “All we ask of everyone is to respect the game. As long as you have this uniform on, go out there and play as hard as you can”); Jim Massie, *Buckeyes are Bruised, Not Beaten In Big Ten*, COLUMBUS (OHIO) DISPATCH, Jan. 17, 2010, at 3C (quoting Ohio State Univ. women’s basketball coach Jim Foster: “When you respect the game, that stuff [starters’ failure to shake hands before the game] doesn’t come into play.”); Scott Akanewich *Montgomery Creates a Band of “Brothers,”* SAN DIEGO UNION-TRIB., April 8, 2010, at CZ 6 (quoting San Diego high school baseball coach Manny Hermosillo: “We respect the game here”); *Pilot Project Shows Way to Clean Up Kids’ Hockey*, TORONTO STAR, April 24, 2010, at S6 (quoting Scott Oakman, executive director of the Greater Toronto Hockey League: “We want a safer, more respectful hockey.”).

⁵⁶ Ryne Sandberg, *Respect the Game*, <http://sports.yahoo.com/mlb/news?slug=rs-speech080105> (Feb. 9, 2011).

⁵⁷ Crash Davis (Kevin Costner), in *Bull Durham* (1988), MEMORABLE QUOTES FROM BULL DURHAM (1988), <http://www.imdb.com/title/tt0094812/quotes>; see also *Awards for Bull Durham*, <http://www.imdb.com/title/tt0094812/awards> (Feb. 3, 2011).

National youth sports governing bodies, national youth sports reform organizations, and local leagues already advance sportsmanship and respect as the lodestars for athletic competition. Some of these organizations have linked sportsmanship and respect to safety, but other organizations have not.⁵⁸ With some tailoring, existing adult-education materials can combine citizenship-based and safety-based messages for the first time or can stress the combination more prominently.

For example, one national governing body, USA Hockey, already instructs that “[f]air play and respect are the backbone of any successful amateur sports program.”⁵⁹ The ultimate goal is a compact among “all participants and spectators [to] have respect for all players, coaches, officials, administrators, spectators and the sport of hockey.”⁶⁰ USA Hockey reaches the specifics: (1) “Players are encouraged to develop a deep sense of respect for all [opponents and officials],” (2) “Coaches are responsible for instructing their players to play in a safe and sportsmanlike manner,” (3) “Each official should enforce the playing rules fairly and respectfully,” and (4) “Spectators are encouraged to support their teams while showing respect for all players, coaches, officials and other spectators.”⁶¹

⁵⁸ See, e.g., *Little League Baseball, Inc., Play It Safe: A Practical Approach to Leadership Responsibility in an Effective Little League Safety Program* 4.11, http://www.littleleague.org/Assets/forms_pubs/asap/Section4_PlayItSafe_2010.pdf (“Good sportsmanship and Courtesy, which are necessary for a harmonious and safe environment, can be taught best through the good example set by all adults on and off the field”) (June 10, 2010); <http://www.respectsports.com/> (“respectful behavior in youth athletics will result in the establishment of standards that foster a healthy and safe environment”) (Feb. 10, 2011).

⁵⁹ See USA HOCKEY, THE OFFICIAL RULES OF ICE HOCKEY vii (2009).

⁶⁰ *Id.*

⁶¹ *Id.*

Turning to youth sports reform organizations, the nationally recognized Positive Coaching Alliance advances “Honoring the Game” as “*the* governing precept in youth sports.”⁶² The precept is grounded in “respect for *Rules, Opponents, Officials, Teammates and one’s Self*” (ROOTS).⁶³ PCA’s call for honor and respect have been embraced by several national sports governing bodies, including Little League Baseball,⁶⁴ USA Water Polo,⁶⁵ and USA Rugby.⁶⁶ The American Youth Soccer Organization (AYSO) similarly strives to “create a positive environment based on mutual respect rather than a win-at-all-costs attitude, and . . . to instill good sportsmanship.”⁶⁷ “A key component of ethical behavior,” adds US Lacrosse, “is respect.”⁶⁸

Local leagues and concerned parents and coaches have created citizenship programs bearing such names as “Respect Sports,”⁶⁹ “Respect the Game”⁷⁰ and

⁶² See JIM THOMPSON, *supra* note 44, at 110 (emphasis in original).

⁶³ *Id.*

⁶⁴ See Little League On-Line,

http://www.littleleague.org/managersandcoaches/Double_Goal_Coaching/PCAHonoringTheGame.htm (Feb. 6, 2011).

⁶⁵ See USA Water Polo, <http://usawaterpolo.org/ProgramsHome/PositiveCoachingAlliance.aspx> (Feb. 6, 2011).

⁶⁶ See USA Rugby, Coach Certification Requirements, <http://www.usarugby.org/default.asp> (Feb. 6, 2011).

⁶⁷ See American Youth Soccer Org. (AYSO), AYSO’s Six Philosophies, http://ayso.com/AboutAYSO/ayso_philosophies.aspx (Feb. 6, 2011).

⁶⁸ See U.S. Lacrosse, Code of Ethics, <http://www.uslacrosse.org/UtilityNav/AboutUSLacrosse/CodeofEthics.aspx> (Feb. 6, 2011). See also Citizenship Through Sports Alliance (CTSA), <http://www.sportsmanship.org/> (Sept. 6, 2010) (discussing “building a sports culture that encourages respect for self, respect for others, and respect for the game”); Athletes for a Better World (ABW), <http://www.abw.org/aboutus/history.asp> (Sept. 6, 2010) (discussing “commitment to the positive values of discipline, integrity, respect, cooperation, and compassion”).

⁶⁹ See, e.g., <http://www.respectsports.com/> (Feb. 5, 2011); Judy Pfitzinger, *Disrespect a Continuing Problem: Trash Talking In Athletics Is a Byproduct of an Increasingly Crass Culture, Those Involved In Youth Sports Say*, Star Tribune (Minneapolis, Minn.), Feb. 13, 2007, at 1E.

⁷⁰ See, e.g., Maryland Public Secondary Schools Athletic Association, *Respect the Game* (“The ultimate indicator of the value of school athletic programs must be the level of citizenship displayed by those who

“Respect My Game.”⁷¹ As it receives players from youth sports programs, the National Collegiate Athletic Association (NCAA) introduced its RESPECT Sportsmanship Initiative in 2009. Through its credo -- “RESPECT. It’s the Name of the Game.”⁷² – the NCAA Initiative aims to “address sportsmanship head-on” by “reinforcing the importance of a respectful competition environment.”⁷³

With sportsmanship and respect already prominent, recasting existing citizenship-based messages to also stress player safety seems a natural evolution in the effort to serve the best interests of the children who play.

IV. CONCLUSION

A. “[O]ne Word – Respect”

“Where did our children learn disrespect for the games and opponents they play?,” *Chicago Tribune* writer Bob Verdi challenged his readers as Neal Goss lay paralyzed in a rehabilitation center a month after the New Trier-Glenbrook North hockey game.⁷⁴ Paraphrasing cartoonist Walt Kelly, Verdi pointed directly at the adults: “We have met the enemy and it is us.”⁷⁵

New safety-based adult-education materials depend on squarely confronting

participate.”), <http://www.mpssaa.org/respectthegame/index.asp> (Feb. 5, 2011); Ohio High School Athletic Association (OHSAA) (“when people involved in high school sports treat each other badly, disrupt games, or generally behave in a manner unworthy of the game itself, they are devaluing what you, and all of us, care so much about”) <http://www.ohsaa.org/RTG/default.htm> (Feb. 6, 2011).

⁷¹ See, e.g., Softball Ontario, <http://lin.ca/resource-details/14297> (“an innovative program geared to create and build mutual respect between all participants in the great game of Softball”) (Sept. 6, 2010).

⁷² See NCAA, RESPECT. IT’S THE NAME OF THE GAME (2d ed. 2009).

⁷³ *Id.* at 2, 12.

⁷⁴ Bob Verdi, *Adults Guilty of Cross-Checking Morality*, CHI. TRIB., Dec. 12, 1999, at 10.

⁷⁵ *Id.* (paraphrasing cartoonist Walt Kelly, creator of “Pogo,” <http://www.bartleby.com/73/521.html>) (Feb. 4, 2011).

“the enemy,” the attitudes of many parents and coaches in youth sports. The first step is to recognize that fidelity to sportsmanship and respect does not indicate softness toward opponents, or lack of passion to win. Ryne Sandberg took a giant step at the ceremony enshrining him in the Baseball Hall of Fame in Cooperstown in 2005. “[I]f there was there was a single reason I am here today,” the Chicago Cubs star told the local and national audience, “it is because of one word – respect”:⁷⁶

I was in awe every time I walked on to the field. That's respect. I was taught you never, ever disrespect your opponent or your teammates or your organization or your manager and never ever your uniform. . . . I played [the game] right because that's what you're supposed to do – play it right and with respect.⁷⁷

Sandberg’s abiding respect fortified his will to win throughout his sixteen-year big league career, though he recognized too that respect has taken hits in recent years. “When we all played,” said the new Hall-of-Famer at the Cooperstown ceremony, respect for the game “was mandatory. It's something I hope we will one day see again.”⁷⁸

B. “[T]orment[] . . . for the Rest of Their Sad Lives”

The second step in confronting “the enemy” within us is to recognize that the

⁷⁶ Ryne Sandberg, *supra* note 56.

⁷⁷ *Id.*

⁷⁸ *Id.*

ultimate purpose of youth sports is to leave the players with memories they can savor during a lifetime of good health. The final score of the New Trier-Glenbrook North game has long since faded from memory, a meaningless statistic years after catastrophic injury suffered by a 15-year-old who played in what was supposed to be a game and not a nightmare. Every person in the Rinkside Sports Ice Arena that night -- including every adult whose passion to win overwhelmed concern for sportsmanship, respect and safety -- learned a bitter lesson the hard way. The lesson, articulated by President George Washington in his Farewell Address in 1796, is that self-discipline means tempering passion with reason.⁷⁹

It did not take long for the out-of-control junior varsity hockey parents to come to their senses after seeing first-hand the human costs that a local breakdown of sportsmanship and mutual respect can exact. When Glenbrook North faced off against Evanston hours after Neal Goss lay face-down on the ice, the chastened Glenbrook North parents cheered when their rivals scored the first goal, a generous gesture grounded in reason but delivered a few nights too late.⁸⁰

The New Trier-Glenbrook North junior varsity hockey game had no winners, only losers. Neal Goss and his opponent were both reportedly clean players not known for skating at the edge of the rules.⁸¹ The opponent reportedly had received

⁷⁹ See *The Farewell Address of President George Washington* (Sept. 17, 1796), http://avalon.law.yale.edu/18th_century/washing.asp (“The Government sometimes . . . adopts through passion what reason would reject. . . .”) (Feb. 1, 2011).

⁸⁰ Scott Stewart, *supra* note 1, at 1.
⁸¹ *Id.*

only one penalty during the prior season.⁸² According to Nancy McMahon, whose son played on the Glenbrook North team and whose husband Jim was the Chicago Bears' former quarterback, the opponent was "just the sweetest thing."⁸³

"[B]oth of these children," said one writer about Neal Goss and the opponent who blind-sided him, "will be tormented by this for the rest of their sad lives."⁸⁴ "I can never say 'sorry' enough," read the opponent from a prepared statement at the juvenile court dispositional hearing. "I pray every day for Neal and a medical miracle that could end this suffering."⁸⁵ "Part of me has survived," Neal Goss responded in the prepared statement he read in court, "and part of me has been lost forever."⁸⁶ The lawyers likely drafted the respective statements, but each young man likely spoke from the heart after learning the grim consequences of casting aside sportsmanship and respect.

Neal Goss remains confined to a wheel chair, dependent on around-the-clock caregivers to bathe and dress him and help with other daily activities because he has no use of his legs, no movement in his fingers, and only limited movement in his arms and wrists. But he also achieved a perfect score on the mathematics part of the Scholastic Aptitude Test (SAT), earned a business degree at the University of Pennsylvania's Wharton School of Business, and secured a position as a financial

⁸² Cornelia Grumman, *supra* note 21, at 1.

⁸³ Bob Verdi, *supra* note 74, at 10.

⁸⁴ Barry Rozner, *What Can Be Learned From Ill-Fated Hit?*, CHI. DAILY HERALD, Dec. 16, 1999, at 1.

⁸⁵ Rummana Hussain, *Probation For Teen Who Delivered Hockey Hit*, *supra* note 9, at 1; *Students' Statements*, CHI. TRIB., Oct. 27, 2000, at 3.

⁸⁶ Rummana Hussain, *Probation For Teen Who Delivered Hockey Hit*, *supra* note 9, at 1.

analyst at a Chicago investment firm. “When you look at what he has had to overcome,” says the firm’s general manager, “it’s inspirational.”⁸⁷

Neal Goss’ story thus proceeds with more optimism than either team might have had reason to foresee after that early-November junior varsity game. The indomitable human spirit has an uncanny capacity to overcome adversity, and athletes fortified by years of physical and emotional discipline tested in competition sometimes demonstrate the greatest resilience of all.

C. *Teachable Moments*

Wise parents and youth-league coaches seek out “teachable moments,” opportunities to educate their children with positive lessons drawn from bad events. Sometimes, however, the adults can learn as well as teach.

Neal Goss’ injury holds two important lessons for parents and coaches who guide young players. First, the law usually cannot make an injured youth-leaguer whole because the civil or criminal proceeding happens only after the injury. Second, parents and coaches behaving irresponsibly can put the players in harm’s way when passion unrestrained by reason neutralizes the safety measures built into national equipment standards and a sport’s rulebook.

In their print and electronic adult-education materials, youth sports governing bodies would serve the teaching process best by coupling existing citizenship-based messages with a strong, clear, prominent new message that also

⁸⁷ Lisa Black & Susan Berger, *supra* note 26, at 1.

stresses injury prevention:

“Sportsmanship + Respect = Safety.”

Parents and coaches who watched Neal Goss lifted from the ice rink on a stretcher that cold November night doubtlessly wished that they could have turned back the clock and scripted a different ending. The story would have had a much happier ending – indeed, there would be no story worth remembering at all -- if the young hockey players had been protected not only nationally by equipment and safety standards, but also locally by adherence to sportsmanship and respect that help insure safe, spirited athletic competition.