



**KHSAA TITLE IX RE-VISIT
FIELD VISIT REPORT**

KHSAA Form T76
Rev..11/16

School:	Bell County
Prepared By:	Gary W. Lawson
Date of Re-Visit:	December 3, 2019
Staff Reviewed By:	Darren Bilberry, Asst. Commissioner
School Year:	2019-2020

ACCOMMODATIONS OF INTEREST AND ABILITIES REVIEW:

OPPORTUNITIES REVIEW (FROM PRIOR YEAR ANNUAL REPORT)	Completed
Test One – Substantial Proportionality	
Test Two – History of Continuing Practice of Program Expansion	
Test Three – Full and Effective Accommodation of Interest and Abilities	Satisfactory
Analysis Form Review	X

ACCOMMODATIONS OF INTEREST AND ABILITIES NOTES: The February 17, 2005 Title IX school visit report designated the accommodation of interest and abilities *Satisfactory*. This rating was based on evidence that the standard established by Test 3 for the provision of athletic opportunities was being met. This report noted that school personnel had documented attempts to follow up on indicated interest in soccer and golf. The October 24, 2012 report also designated this category *Satisfactory*. At that time, information provided showed that the standards established by both Tests 1 and 3 were being met. The internal summary for the 2018-19 annual report indicated that the school is currently meeting the standard established by both Tests 1 and 3. A review of the team rosters (upon which Test 1 is based) showed errors in the number of participants especially in boys and girls basketball. Because of these inaccurate submittals, it is not possible to determine that Test 1 is being met at this time. The evidence on the T-3 and T-63 forms does indicate that student athletic interests are being accommodated. The T-63 form in the 2017-18 annual Title IX report shows that an 80.4% completion rate was received on the most recent student athletic interest survey. During the most recent school visit, the Title IX file was examined. It contained a copy of the 2018-19 annual Title IX report, all the previous Title IX school visit reports, a board-approved extra service pay schedule for coaches, a listing of the current members of the Gender Equity Review Committee, current game schedules for several of the school's varsity teams (**see Scheduling of Games and Practice Times and KHSAA Recommended Action**), a school-generated athletic handbook for coaches, a facility usage schedule for the gym (**see Scheduling of Games and Practice Times and KHSAA Recommended Actions**), regulations addressing the provision of letter jackets and the posting of athletic banners recognizing teams (**see Publicity and KHSAA Recommended Action**), minutes for one Gender Equity Review Committee meeting held in 2016, one in 2017, and one in 2019. **School officials were reminded that the minimum requirement is for the GERC to meet at least three times each year. (See KHSAA Recommended Action.)** The Title IX file also had a uniform review, rotation, and/or replacement plan, a statement addressing equitable lodging for student athletes (**see Travel and Per Diem Allowances and KHSAA Recommended Action**), and a listing of the assigned locker room and equipment storage space for each team. **SCHOOL OFFICIALS AND MEMBERS OF THE GENDER EQUITY REVIEW COMMITTEE WERE STRONGLY ENCOURAGED TO WORK TOWARD THE DEVELOPMENT AND IMPLEMENTATION OF GUIDELINES AND PROCEDURES ADDRESSING THE EQUITABLE PROVISION OF OPPORTUNITIES AND BENEFITS FOR STUDENT ATHLETES.**

BENEFITS REVIEW

BENEFIT	Satisfactory	Deficient
EQUIPMENT AND SUPPLIES	X	
INDIVIDUAL COMPONENTS	Acceptable	Needs Improvement
Uniform review / replacement plan	X	
Status of uniforms and equipment	X	
Equity of spending	X	

BENEFITS REVIEW- EQUIPMENT AND SUPPLIES: Both the 2005 and 2012 Title IX school visit reports designated this benefit category *Satisfactory*. The 2012 report documented that the school's plan for review and replacement of uniforms did not show a complete cycle of replacement for all school teams. The report also stated that spending within this benefit category significantly favored the male participants. All the uniforms inspected during the most recent visit were of high quality and appeared to be supplied in equitable quantities. The Title IX file had a uniform review, rotation, and/or replacement plan showing that all teams were currently on a four-year cycle of replacement. Interviews with student athletes and coaches revealed there was limited knowledge of this plan and indicated a lack of adherence to it. The 2017-18 and 2018-19 annual Title IX reports showed that \$362 per female athlete and \$376 per male athlete was spent for equipment and supplies. This spending is within generally accepted parameters for parity in a football-playing school.

BENEFIT	Satisfactory	Deficient
SCHEDULING OF GAMES AND PRACTICE TIMES		X
INDIVIDUAL COMPONENTS	Acceptable	Needs Improvement
Like sports scheduling		X
Scheduling of shared practice facilities		X
Optimal playing times	X	

BENEFITS REVIEW- SCHEDULING OF GAMES AND PRACTICE TIMES: The 2005 and 2012 Title IX school visit reports designated this benefit category *Satisfactory*. The two major segments of this benefit category—the **equitable scheduling of competitive events for “like” teams and the provision of equitable access to shared practice facilities**—could not be evaluated because **the school failed to make recent games schedules for all school teams available and failed to provide usage schedules for all facilities that are shared for practice times per gender**. The lack of information provided by the school prohibiting the required assessment renders this benefit category **deficient**. (See **KHSAA Recommended Action**.) The scheduling of all competitive events during the most opportune playing times on an equitable basis was discussed with school officials who were encouraged to continue to make this type of scheduling a priority.

BENEFIT	Satisfactory	Deficient
TRAVEL AND PER DIEM		X
INDIVIDUAL COMPONENTS	Acceptable	Needs Improvement
Mode of transportation		X
Provision for meals and housing		X
Equity of spending	X	

BENEFITS REVIEW- TRAVEL AND PER DIEM; The 2005 Title IX school visit report designated this benefit category *Satisfactory*. The 2012 report rated this category *Deficient*. The 2012 report documented the lack of written guidelines for equitable travel and per diem supported by interviews with students and coaches that indicated there were no procedures being followed in regard to equity of this benefit. It was also documented that spending within this benefit category favored male participants. A review of the current Title IX file, as well as interviews with coaches and student athletes, indicated that equitable regulations still are not in place to address the mode of transportation or provision of meals for student athletes while there was a guideline for equitable lodging. However, it could not be confirmed that there was knowledge of or adherence to this regulation. The continued failure to develop and implement the requested regulations renders this benefit category **deficient. (See KHSAA Recommended Action.)** The 2017-18 and 2018-19 annual Title IX reports show that \$84 per female athlete and \$114 per male athlete was spent for travel and per diem.

BENEFIT	Satisfactory	Deficient
COACHING	X	
INDIVIDUAL COMPONENTS	Acceptable	Needs Improvement
Compensation	X	
Accessibility	X	
Competence	X	

BENEFITS REVIEW- COACHING: The 2005 and 2012 Title IX school visit reports designated this benefit category *Satisfactory*. The principal is responsible for evaluation of all head coaches. A written instrument is not currently used for documentation of this process. A review of the district's extra service pay schedule for coaches indicated parity in the amount of compensation as well as the number of compensated positions for "like" sports. The T-35 form in the 2018-19 annual Title IX report shows "relative parity" in relation to the total amounts spent for coaching salaries for teams of "like" sports. Information provided by the athletic director during the most recent visit revealed that the coaching ratio is 20 athletes per coach for females and 22 athletes per coach for males. [Note: The accuracy of these ratios is dependent upon the accuracy of player rosters submitted to KHSSA.] **(See the Accommodation of Interest and Abilities section of this report.)** Data gathered during the most recent visit indicated that 57% (4/7) of the head coaches of girls teams and 43% (4/7) of the head coaches of boys teams were on-campus employees.

BENEFIT	Satisfactory	Deficient
LOCKER ROOMS, PRACTICE AND COMPETITIVE FACILITIES	X	
INDIVIDUAL COMPONENTS	Acceptable	Needs Improvement
Competition and practice venues	X	
Dressing areas	X	
Equipment storage areas	X	

BENEFITS REVIEW- LOCKER ROOMS, PRACTICE AND COMPETITIVE FACILITIES: The 2005 Title IX school visit report designated this benefit category *Deficient* citing the lack of an adequate tennis facility, poorly maintained track, and the location of storage space for volleyball as major issues. The report stated that these inadequacies impacted girls' athletic participation more than it did boys. The 2012 report designated this category *Satisfactory*. The report stated that a new track and new tennis courts had been constructed since 2005, and a small storage area had been provided for volleyball. The most recent school visit revealed that the venues for athletics are very well maintained and appointed. Overall, the practice and competitive facilities are excellent, and the amenities at these venues seem to be equivalent for "like" sports. Noted improvements have been made at the softball facility, tennis courts, and track. The Title IX file had documentation of the assignment of locker room and equipment storage space for all teams that showed parity in terms of the size of the teams and the proximity to their competitive facility. It appears that the school has made an effort to provide equitable amenities within this benefit category based on the tour of facilities and interviews with coaches and student athletes.

BENEFIT	Satisfactory	Deficient
MEDICAL AND TRAINING FACILITIES AND SERVICES	X	
INDIVIDUAL COMPONENTS	Acceptable	Needs Improvement
Weight room location and access	X	
Weight room usage schedule		X
Appropriate equipment for female use	X	
Athletic Training services	X	
Physical Exams	X	

BENEFITS REVIEW- MEDICAL AND TRAINING FACILITIES AND SERVICES: The 2005 and 2012 Title IX school visit reports designated this benefit category *Satisfactory*. In 2012, the school had two weight training facilities. According to the athletic director, females had access to both facilities. The report requested the school to develop and post an equitable usage schedule for both weight training rooms. The school currently has two weight training rooms—Weigh Room #1 is used exclusively by the football team, and Weight Room #2 is shared by all other teams. Both are well-maintained and equipped. Weight Room #2 has numerous training options that are suitable for females. Interviews with student athletes confirmed significant use of Weight Room #2 and the suitability of the equipment. The usage schedule for Weight Room #2 provided at the time of the most recent visit was incomplete. (**See *Scheduling of Games* and *Practice Times and KHSAA Recommended Action*.**) Student athletes have the services of an athletic trainer on an equitable basis. The current trainer is an employee of the school district. Free physical exams are provided by the school's nurse practitioner to all student athletes.

BENEFIT	Satisfactory	Deficient
PUBLICITY		X
INDIVIDUAL COMPONENTS	Acceptable	Needs Improvement
Support group assignments		X
Written regulation for recognition		X
Equity of spending		X

BENEFITS REVIEW- PUBLICITY: The 2005 and 2012 Title IX school visit reports designated this benefit category *Satisfactory*. The 2012 report recommended that regulations for this category be expanded to include equitable provision of awards and post season banquets. The school currently has one varsity cheerleading squad that is assigned to cheer at all home football games. The athletic director and principal did not know how this squad is assigned to cheer at basketball games. (**See KHSAA Recommended Action.**) The band is assigned to perform at all home football games. The principal and athletic director said they did not know how the band is assigned to play at basketball games. (**See KHSAA Recommended Action.**) The Title IX file contained regulations for the provision of school jackets and the posting of athletic banners recognizing team accomplishments. (**See KHSAA Recommended Action.**) There were no regulations in the file addressing equitable provision of athletic awards or post season banquets. (**See KHSAA Recommended Action.**) The 2017-18 and 2018-19 annual Title IX reports show that \$28 per female athlete and \$45 per male athlete was spent for awards and recognition. THIS SPENDING APPEARS TO FAVOR THE MALE PARTICIPANTS. (**See KHSAA Recommended Action.**) Because equitable assignment of support groups could not be confirmed; there is a lack of equitable guidelines for the posting of banners recognizing individual accomplishments and the provision of awards and post season banquets; and that spending within this category seems to be outside acceptable parameters for the provision of parity; this area is rendered **deficient**. (**See KHSAA Recommended Action.**)

BENEFIT	Satisfactory	Deficient
SUPPORT SERVICES	X	
INDIVIDUAL COMPONENTS	Acceptable	Needs Improvement
Office access	X	
Booster Support	X	
Overall spending for athletic support	X	

BENEFITS REVIEW- SUPPORT SERVICES: The 2005 and 2012 Title IX school visit reports designated this benefit category *Deficient*. The reason given in both reports for this deficiency was that spending totals submitted by the school were far outside of generally accepted parameters for the provision of parity for a football playing school. The school currently has three *exclusive* coaching offices—one for football, one for girls' basketball, and one for boys' basketball. The school has active booster clubs supporting the following teams—girls' basketball, boys' basketball, football, softball, baseball, girls' cross country, and boys' cross country. All booster clubs house their funds in school accounts and, according to school administrators, the purchase order process is strictly adhered to for all athletic purchases. An analysis of athletic spending for the past two years revealed the following:

2017-18 36.68% of the expenditures were for female athletes who made up 39.07 % of the participants. \$420.52 per female athlete and \$465.57 per male athlete was spent for total support.

2018-19 37.99% of the expenditures were for female athletes who made up 41.64% of the participants. \$531 was spent per female athlete and \$618.42 per male athlete for total support.

When the total expenditures are averaged over the period of this analysis, they seem to be well within acceptable parameters for the provision of parity for a football playing school. IT SHOULD BE NOTED THAT THE INACCURATE ROSTERS SUBMITTED IN THE 2018-19 ANNUAL REPORT COULD LIKELY AFFECT THE SPENDING ANALYSIS FOR THAT YEAR.

CURRENT DEFICIENCIES

Observed Deficiencies in Overall Girls and Boys Athletics Programs	Recommended Actions in relation to current deficiencies	Date for Verification of Action to address deficiency
<p>(Scheduling of Games and Practice Times) The school failed to provide recent game schedules for all school teams.</p>	<p>The school is to submit to KHSAA current competitive event schedules for the following teams: girls' tennis girls golf boys' tennis boys golf</p>	<p>On or before <u>April 15, 2020</u></p>
<p>The school failed to provide accurate facility usage schedules for all practice venues shared per gender.</p>	<p>The school is to submit to KHSAA current and accurate facility usage schedules for <u>Weight Training Room 2</u>—the shared non-football venue and <u>the indoor hitting facility</u> shared by baseball and softball.</p>	<p>On or before <u>April 15, 2020</u></p>
<p>(Publicity) The school failed to provide evidence of the equitable assignment of athletic support groups.</p>	<p>The school is to submit to KHSAA the assignment of the varsity cheer squad for boys and girls' basketball</p> <p>The school is to submit to KHSAA the assignment of the band to provide equitable support for boys and girls basketball</p>	<p>On or before <u>April 15, 2020</u></p>
<p>The school failed to provide evidence of the implementation of equitable regulations addressing the posting of banners recognizing individual athletic accomplishments, the provision of equivalence in regard to athletic awards, and the provision of parity in regard to post season banquets.</p>	<p>The school is to submit to KHSAA written regulations related to parity in the posting of banners for the recognition of individual athletic achievements. A copy of these regulations should be placed in the Title IX file once they are approved</p>	<p>On or before <u>April 15, 2020</u></p>
<p>Expenditures submitted by the school show a significant advantage to male athletes in the provision of awards and recognition.</p>	<p>The school is to submit to KHSAA regulations addressing parity in regard to the provision of awards that are signed by all members of the Gender Equity Review Committee and head coaches of all teams. A copy of these regulations should be placed in the Title IX file once they are approved</p> <p>The school is to submit to KHSAA regulations addressing the equitable provision of post season banquets. These regulations are to be signed by all members of the Gender Equity Review Committee and head coaches of all teams. A copy of</p>	<p>On or before <u>April 15, 2020</u></p>

	<p>these regulations should be placed in the Title IX file once they are approved.</p> <p>The school is to submit to KHSAA an explanation for the significant disparity in spending for awards and recognition submitted on the T-35 form in the 2018-19 annual Title IX report. This explanation should include the identification of the teams on which this money was spent that resulted in this disparity. The mechanism for administrative oversight which the school has in place to address this spending should also be included.</p>	
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RECURRING DEFICIENCIES

Observed Deficiencies in Overall Girls and Boys Athletics Programs	Recommended Actions in relation to recurring deficiencies	Date for Verification of Action to address deficiency
<p>The deficiency in the 2012 school visit report in this benefit category Support Services appears to have been addressed. Information submitted by the school for the past two years shows that expenditures were within the accepted parameters for the provision of parity for a football-playing school.</p>	<p>NA</p>	<p>NA</p>
<p>TRAVEL AND PER DIEM ALLOWANCES This benefit category was deficient in 2012 and continues to be deemed deficient at this time because the school failed to provide documentation that equitable regulations were being followed in regard to the mode of transportation and the provision of meals for student athletes. There were regulations available that addressed the provision of lodging, but it could not be fully substantiated that the coaches or student athletes were knowledgeable of these regulations.</p>	<p>The school is to submit to KHSAA written regulations addressing the equitable provision of mode of transportation, meals, and lodging for student athletes. These regulations are to be signed by all head coaches of school teams and all members of the Gender Equity Review Committee. These regulations are to become part of the school's Title IX file once they are approved.</p>	<p>On or before <u>April 15, 2020</u></p>

OTHER ACTIONS NECESSITATED BY THIS VISIT

Action	Due Date
<p>ACCOMMODATION OF INTEREST AND ABILITIES</p> <p>The school is to submit to KHSAA minutes for at least three Gender Equity Review Committee Meetings held during the 2019-2020 school year. Each of the three sets of these minutes should be signed by all committee members in attendance.</p>	<p>On or before <u>April 24, 2020</u></p>
<p>KRS 160.445</p> <p>The school is to submit to KHSAA an Athletic Facility Emergency Medical Plan that is <u>venue-specific</u> as required by the statute.</p>	<p>On or before <u>April 15, 2020</u></p>

PERSONNEL IN ATTENDANCE AT FIELD VISIT MEETING

Name	Title
Gary W. Lawson	KHSAA
Andrew Caldwell	Student Athlete
Abigail Cornett	Student Athlete
David Teague	Girls Basketball Coach
Alex Barnett	Fast Pitch Softball Coach
Richard Gambrel	Athletic Director
Brian Crawford	Principal
Mitch Bailey	DOSE/Title IX Coordinator
Brad Sizemore	Boys Basketball Coach
Christie Willis	Assistant Principal
LaHonia Barton	Finance Clerk
Kathy Johnston	KHSAA

OTHER GENERAL OBSERVATIONS

Although not part of the current Title IX evaluation, as per request, the school was asked to provide a copy of its Athletic Facility Emergency Plan (KRS 160.445). At the time of this visit, the plan presented was generic and not venue-specific as requested by the statute. (See ***KHSAA Recommended Action.***)

During the visit, as per request, the school was asked to identify the locations of all Automated External Defibrillators that are available. According to the school's athletic director, there are three portable AED's. One is in the athletic training room. Another is in the teachers' mail room. The third one is in the nurse's station.

No one from the community attended the Public Comments session. School officials were strongly encouraged to work with the GERC to monitor the provision of opportunities and benefits for student athletes and to develop and implement policies to reinforce compliance to Title IX. The meeting was adjourned at 3:35 p.m.