

KHSAA TITLE IX RE-VISIT FINAL AUDIT REPORT

(For schools re-visited during the 2015-2016 school year)

School: Christian Academy—Louisville Prepared By: Gary W. Lawson

Date of Re-Visit: November 18, 2015

Telephone Number of Reviewer: **(859) 299-5472**Reviewed By: **Darren Bilberry, Asst. Commissioner**

1.	Completed	Required	Forms

Verification of Forms (Form GE-19)	Yes ⊠ No □
Participation Opportunities Summary Chart (Form T-1, T-2,	, T-3 & T-4) Yes ⊠ No □
Benefits Summary Charts (Forms T-35 & T-36)	Yes ⊠ No □
Checklist Overall Athletics Program (Form T-41	Yes ⊠ No □
Improvement Plan Summary Charts (Form T-60)	Yes ⊠ No □

2. Opportunities Component of Title IX Compliance

Area of Compliance: (Check One or More)

	А	Substantial Proportionality	
	В	History and Continuing Practice Of Programs Expansion	
Х	С	Full and Effective Accommodation of Interest and Abilities	

 A). Was the Substantial Proportionality Test (T-1) an area in which the school met Title IX Opportunities compliance? Yes □ No ☒
Comments: According to the information provided by the rosters submitted, it appears that the school has not met the standard established by Test 1 for provision of athletic opportunities during any of the past three school years. The T-1 form in the 2014-15 annual Title IX report shows that females were 45.4% of the school's athletic participants, and they made up 52.7% of the enrollment.
B). Was the History and Continuing Practice of Program Expansion Test (T-2) an area in which the school met Title IX Opportunities compliance? Yes □ No ⊠
Comments: The rosters and information in the annual Title IX reports indicate that the school has not met the standard established by Test 2 for the provision of athletic opportunities during any of the past three school years. Although four teams have been added during the past five years, the percentage of participation for the underrepresented gender has not reached the minimum requirement for compliance in regard to Test 2.
C). Was the Full and Effective Accommodations of Interest and Abilities Test (T-3) an area in which the school met Title IX Opportunities compliance? Yes ⊠ No □
(T-3) an area in which the school met Title IX Opportunities compliance?
(T-3) an area in which the school met Title IX Opportunities compliance? Yes ☒ No ☐ Comments: The responses and explanations submitted in the annual Title IX reports give strong indication that the standard established by Test 3 for provision of athletic opportunities is currently being met. The responses on the T-3 form appear to be supported by the information in the most recent student athletic interest survey. The school currently offers 19
 (T-3) an area in which the school met Title IX Opportunities compliance? Yes ☑ No □ Comments: The responses and explanations submitted in the annual Title IX reports give strong indication that the standard established by Test 3 for provision of athletic opportunities is currently being met. The responses on the T-3 form appear to be supported by the information in the most recent student athletic interest survey. The school currently offers 19 total teams for female participation and 17 total teams for male participation. 3. Is the school's most recent Student Interest Survey accurate in relation to the assessment of Interests & Abilities?

4. Checklist of the Title IX Components of the Interscholastic Program

Benefit to Students	Satisfactory	Deficient	Comments
Accommodation of Interests and Abilities	X		The February 7, 2001 Title IX school visit report rated this area Satisfactory. It was stated that, at that time, it appeared the school was meeting the standards established by all three opportunities tests. The January 19, 2010 report deemed this category Satisfactory, and documented that the standard established by Test 3 appeared to be met. Information found in the annual Title IX reports for the past three years give strong indication that the standard of Test 3 is currently being met. The school offers all KHSAA sanctioned sports and sport activities except archery, bass fishing, and wrestling. They also offer the nonsanctioned sport of lacrosse for both males and females. (See a detailed explanation for all three opportunities tests on page 2 of this report.) During the most recent visit the school's Title IX file was inspected and found to contain the two previous Title IX school visit reports, annual Title IX reports for the past five years, an extra service pay schedule for coaches (see Coaching), a listing of the current members of the Gender Equity Review Committee, current game schedules for all school sponsored varsity teams, seasonal game programs (fall, winter, spring) in which every team was recognized, facility usage schedules for the gyms, field hockey/girls lacrosse field, soccer/boys lacrosse field, tennis courts, and weight training room. The file also contained equitable written guidelines regarding the provision of letters, bars, awards, and athletic banquets (see Publicity and KHSAA Recommended Action), written designation of the locker room and athletic equipment storage space assigned each team, minutes for all Gender Equity Review Committee meetings held during the past three years, a written uniform review, rotation, and/or replacement plan, guidelines regarding the equitable provision of travel and per diem (see Travel and Per Diem Allowances), and a copy

Accommodation of Interests and Abilities continued		of the school's Athletic Facility Emergency Medical Plan (KRS 160.445). School officials were commended for the development and maintenance of a very comprehensive and well organized Title IX file.
Equipment and Supplies	X	Both the previous Title IX school visit reports rendered this benefit category <i>Satisfactory</i> . The 2010 report documented that spending in this category was difficult to evaluate due to incomplete reporting on the re-visit form. The school currently has an equitable uniform review plan based on a three-year cycle of replacement for all sports except football which is replaced every five years and girls and boys tennis, girls and boys swimming, and boys and girls bowling which replace uniforms annually. Interviews with student athletes and coaches indicated this plan was being followed. All uniforms reviewed during the most recent visit were of mid to high quality and seemed to be supplied in equitable quantities. Information submitted in the 2013-14 and 2014-15 annual Title IX reports indicate that the school was spending approximately \$75 per female athlete and \$95 per male athlete for equipment and supplies.
Scheduling of Games and Practice Time	X	The two earlier school visit reports rated this category Satisfactory. Information provided during the most recent visit showed that the number of competitive events scheduled for teams of "like" sports was comparable. Facility usage schedules showing equitable access were provided for all shared athletic venues (gyms, field hockey/girls lacrosse field, soccer/boys lacrosse field, tennis courts, and weight training room). The scheduling of athletic events during the most optimal playing times was discussed with school officials who were encouraged to continue to strive for equity in this endeavor.
Travel and Per Diem Allowances	Х	The 2001 and 2010 Title IX school visit reports deemed this benefit category Satisfactory. The 2010 report documented that the written regulations regarding this benefit did not include the provision of per diem. The most recent review of the school's Title IX file revealed that written guidelines are in place which address the mode of transportation and

Travel and Per Diem Allowances continued		provision of meals and lodging for student athletes. Upon receipt of this report, it is recommended that these guidelines be expanded to document that all lodging is to be booked by the school's administrative assistant who is responsible for the provision of parity in regard to this benefit. According to the information provided in the 2013-14 and 2014-15 annual Title IX reports, the school was spending approximately \$49 per female athlete and \$57 per male athlete for travel and per diem.
Coaching	X	Both the previous Title IX school visit reports assessed this category <i>Satisfactory</i> . The school's athletic director is responsible for evaluating all head coaches. A written instrument is used for documentation in this process. A review of the extra service pay schedule for coaches shows parity in relation to compensation. UPON RECEIPT OF THIS REPORT, IT IS RECOMMENDED THAT THE SCHOOL'S SALARY SCHEDULE BE EXPANDED TO SHOW THE NUMBER OF PAID ASSISTANT COACHES FOR EACH SCHOOL SPONSORED SPORT. According to the information on the T-35 form in the 2014-15 annual Title IX report, the total amounts spent for coaches' salaries for teams of "like" sports showed relative parity. Also in the 2014-15 annual report, the data revealed that the coaching ratio for female athletes was one coach per seven participants compared to the one coach per 8.5 male athletes. Information gathered during the most recent visit indicated that 17% (2/12) of the head coaches of girl's teams and 27% (3/11) of the head coaches of boys teams were on-campus employees.
Locker Room, Practice and Competitive Facilities	X	The 2001 and 2010 Title IX school visit reports designated this benefit category <i>Satisfactory</i> . At the time of the 2010 visit, a new field house was under construction. This facility is now complete and offers many excellent benefits for student athletes and coaches. The amenities include, but are not limited to, two large dressing rooms, several equipment storage areas, a spacious coaching office and team meeting room, an athletic training room, and a weight room. The athletic program is

Locker Room, Practice and Competitive Facilities continued		greatly enhanced by this venue. As was the case at the time of the 2010 visit, the school's competitive and practice facilities appear to be of high quality and very well maintained. The amenities at these venues seem to be comparable for girls and boys. The lockers at the field house and in the school building are shared and appear to be assigned with gender equity as a priority. It should be noted that the dressing room in the school building that serves boys teams has been renovated this past year. Due to these improvements, it does offer superior amenities compared to the girls dressing room. The girl's dressing room will be renovated during the 2015-16 school year. The school and the architectural firm doing the renovations have made a commitment in writing that the girl's dressing room will have the same amenities as the boys dressing room when the renovation is completed. (See "Exhibit #1—11/18/15 School Visit"—in the Title IX file.) A very large storage room upstairs in the high school gym provides equipment and supply storage space for all the school-sponsored teams. Almost all teams have a second storage area at or near their competitive venue. The assignment of space for coaching offices appears to be comparable. Since 2001, significant improvement has been shown in the provision of quality practice and
Medical and Training Facilities and Services	X	Both the previous Title IX school visit reports rendered this benefit category Satisfactory. The 2010 report did identify a significant concern regarding a lack of accessibility to the athletic trainer by the field hockey team. The most recent visit revealed that the school has the services of an athletic trainer on a daily basis through a contract with K.O.R.T. Interviews with school administrators, student athletes, and coaches all gave strong indication that the current trainer is equally accessible to all student athletes. The school has a large weight training room which appears to be accessible to all athletic teams on an equitable basis. A schedule for the weight room was in the Title IX file and posted at the facility. Numerous training options are

		available at this venue that are very appropriate for female athletes. Physical examinations are the responsibility of the student athletes.
Publicity	X	Both previous Title IX school visit reports rated this benefit category <i>Satisfactory</i> . The school currently has one varsity cheerleading squad which is assigned to cheer at all home and away football games. They also cheer at all home boys and girls basketball games and at away games for both teams that are within a 45 minute radius. The marching band performs at all home football games. The pep band plays at an equal number of home boys and girls' basketball games. The number of games at which they perform is monitored by the athletic director to insure parity. The school does not sponsor a dance team at his time, and there is no radio coverage of athletic events. The Title IX file contained detailed written guidelines for the provision of letters and bars as well as athletic awards and banquets. The school's gym houses numerous large and impressive banners recognizing athletic accomplishments. No guidelines were found that detailed the criteria that determine recognition on these banners. (See KHSAA Recommended Action.) The data submitted in the 2013-14 and 2014-15 annual Title IX reports show that the school was spending approximately \$29 per female athlete and \$36 per male athlete for awards.
Support Services	X	The 2001 and 2010 Title IX school visit reports rendered this benefit category Satisfactory. The 2010 report documented that the category could not be completely evaluated because the expenditures submitted to KHSAA did not include a full disclosure of booster spending. Information provided during the most recent visit indicated several changes have been made in relation to the financial support for student athletes. The school currently has no athletic booster clubs. Financial support for the athletic teams is now provided through team fundraising (all fundraising monies are deposited in school accounts), the assessment of a general athletic fee which is currently \$200

Support Services continued		per participant/per sport, and the assessment of a team athletic fee which varies according to the sport. The athletic director is responsible for oversight of the team athletic fee to insure there is equivalence in the amount assessed to individuals on teams of "like" sports. School officials were cautioned that these fees should show equivalence for "like" sports when evaluated over a two-year period. The institution should show evidence of consistent oversight and review in regard to any athletic fees assessed. The Internal Analysis Summary for the 2013-14 annual Title IX report shows that 56% of athletic expenditures were for females who made up 44% of the participants and 44% of the expenditures were for male athletes who made up 56% of the participants or approximately \$642 per female athlete and \$393 per male athlete. The Internal Audit Summary for the 2014-15 annual Title IX report shows that 43% of the spending was for female athletes who made up 45% of the participants and 57% of the spending was for male athletes who made up 55% of the participants or approximately \$402 per female athlete and \$451 per male athlete. This analysis of spending indicates the school is well within generally accepted parameters for the provision of parity for a football-playing school over a two-year period.
Athletic Scholarships	NA	
Tutoring	NA	
Housing and Dining Facilities and Services	NA	
Recruitment of Student Athletes	NA	

5. Brief Summary/Analysis of the Improvement Plan (Form T-60)

The school's most recent T-60 forms call for the following:

- Providing equity of benefits in relation to athletic budget allocations;
 Adding more female coaches to the staff;
- Increasing the opportunities for female athletic participation at the elementary and middle school levels.

6. Observed Deficiencies in Overall Girls and Boys Athletics Programs

No major deficiencies were designated as a result of the November 18, 2015 Title IX school visit report.

There were a few areas of concern in relation to:

- development and implementation of equitable compensation and access in relation to coaching. (See Coaching)
- development of equitable guidelines in relation to the provision of lodging for student athletes. (See *Travel and Per Diem Allowances*.)
- development of equitable guidelines in relation to the posting of banners for athletic recognition. (See *Publicity* and *KHSAA Recommended Action*.)
- provision of equity in relation to assessment of student athletic fees. (See Support Services.)

7. KHSAA Recommended Action in relation to new deficiencies

Although no deficiencies were designated in the body of this report, it is requested that the following area of concern be addressed in an attempt to insure that equitable benefits continue to be provided.

(Publicity) On or before <u>February 12, 2016</u>, the school is to submit to KHSAA written regulations regarding the provision of equity in relation to the posting of banners for athletic recognition in the gym and other public areas in the school. The regulations should include the recognition of teams as well as individual accomplishments. This document should become a permanent part of the school's Title IX file.

8. KHSAA Recommended Action in relation to reoccurring deficiencies

No deficiencies were designated as a result of the January 19, 2010 Title IX school visit.

It should be noted that Christian Academy of Louisville has had three Title IX school visits in 2001, 2010, and 2015 and has not been reported to be deficient in any area. The school is commended for continued progress in relation to the equitable provision of opportunities and benefits for their student athletes.

9. PERSONNEL IN ATTENDANCE AT AUDIT MEETING

High School Title IX Coordinator: Jennifer Roberts, 700 S. English Station Rd., Louisville, KY (502) 244-3225 40245

District Level Title IX Coordinator: Brad Morgan, 700 S. English Station Rd., Louisville, KY

(502) 244-3225 40245

Name	Title	Telephone
Gary W. Lawson	KHSAA	(502) 545-3393
Garrett McIntire	Student Athlete	(502) 244-3225
Allison Edlin	Student Athlete	(502) 244-3225
Patty Ernst	Volleyball Coach	(502) 741-9878
Perry White	Basketball Coach	(502) 299-0415
Larry Wooldridge	Principal	(502) 244-3225
Brad Morgan	District Rep	(502) 244-3225
Jennifer Roberts	Assistant Athletic Director	(502) 244-3225
Chad Foster	Independent	(502) 594-0901
Mike Hatfield	Track and Field Coach	(502) 244-3225
Robbie Brown	Assistant Principal	(502) 244-3225
Sharon Tippett	KHSAA	(859) 299-5472

10. Comments

No one from the community attended the Public Comments session. The school's athletic department was commended for their thorough preparation for the school visit. The meeting was adjourned at 3:20pm EST.