



# KHSAA TITLE IX RE-VISIT FIELD VISIT REPORT

KHSAA Form T76  
Rev. 11/16

School:	Frederick Douglass High School
Prepared By:	Kathy Johnston
Date of Re-Visit:	November 25, 2024
Staff Reviewed By:	Darren Bilberry, Asst. Commissioner
School Year:	2024-2025

## ACCOMMODATIONS OF INTEREST AND ABILITIES REVIEW:

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

**ACCOMMODATIONS OF INTEREST AND ABILITIES NOTES:** The accommodation for student interest and abilities (Test 3) are examined and determined by the results of the 2024 Student Interest Survey that is submitted, biennially, with the School Annual Report. The survey requirement for Frederick Douglass High School was not submitted, therefore, sport interest and/or expansion opportunities for varsity, junior varsity, and/or freshman levels of play could not be determined, thus rendering this area deficient. Frederick Douglass High School did not meet the percentage requirements, for the females as the underrepresented gender, to meet the standards of Test One (1) or Test Two (2). Submitted documentation showed that there are currently eighteen (18) varsity level sport and/or sport activity opportunities for both males and females at Frederick Douglass High School. The total sport level opportunities reported for males is 28 and the total reported for females is 26. A review of the school Title IX committee list included student athletes, coaches, and athletic administration. It is recommended that this committee consider the addition of parents and other personnel that would be valuable to the purpose and function of overseeing the equitable opportunities and benefits provided for its student athletes.

School administration were reminded of the importance for accurate team and roster submission so that an accurate analysis of Frederick Douglass High School for the areas of Opportunities and Benefits can be determined.

### 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:** There was written evidence of a uniform review and/or rotation plan for purchase for all uniforms. Documentation indicated a three-year rotation plan for purchase and that all uniforms to be purchased require prior review by the Title IX Committee. Written documentation indicated uniform inventory requirements to be submitted to the athletic director from each sponsored team. All uniforms viewed were of high quality and appeared to be supplied equitably except in the case of:

- girls' and boys' lacrosse - 3 practice tops for males and 0 for females
- baseball and softball - 5 tops and 3 pants for baseball compared to 2 tops and 2 pants for softball
- volleyball - 3 tops for females and 2 tops for males
- wrestling - 2 full uniforms for males and 1 for females

A two-year review of spending could not be evaluated due to incomplete reporting of expenditures for the category of Equipment/Supplies on the T-35 form of the 2024 Annual Report.

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:** There was no written evidence of team game schedules in the school Title IX file, therefore the evaluation of like sport scheduling could not be determined. Interviews with administration indicated the shared facilities to include the stadium which holds practice and competitive events for football, soccer, lacrosse, and track; the main gym, the auxiliary gym, and the studio area located in the upper gym area. Also included is the indoor hitting facility that is located in the auxiliary gym and utilized by baseball and softball teams. There was evidence of calendars showing assignment of use for these facilities but there was not a guideline that ensured the equitable use, access, and administrative oversight of such scheduling. The guideline, developed by the Gender Equity Committee, should ensure that those teams sharing a facility for practice times, during the same season, are protected by such with equitable usage and access to that facility.

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:** There was no written evidence of a travel and per diem guideline which would include mode of transport and the provision for meals and housing (overnight stay) for student athletes. Interviews with student athletes and coaches indicated modes of transport have included parent transport, vans, charter bus, and school bus to competitive events. Interviews with student athletes and coaches also indicated the benefit of pre-game meals and provided meals on long distance and/or overnight trips. Student athletes also shared experiences relative to housing (overnight stay) that included quality of hotel, number of students per room, and provided meals. A two-year review of spending could not be evaluated due to the incomplete reporting of expenditures for the category of Travel and Per Diem on the T-35 form of the 2024 Annual Report.

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

**BENEFITS REVIEW- COACHING:** There was viewed evidence of a school board approved salary schedule which showed equivalence in coaching compensation and an equitable number of coaching positions provided for the like sports. There was an additional Fayette County Schools document which showed the maximum number of coaches allowable per sport indicating specific numbers to be paid by the school board and another paid by the school. Interviews with administration indicated that school paid coaches are contributions made by each team's booster organization. According to submitted data, the athlete to coach ratio, with regard to accessibility, is approximately 10:1 for females and approximately 11:1 for males. Interviews with school administration indicated that the athletic director evaluates all head coaches at the end of each season. A written form for evaluation is used in this process. It was also stated that head coaches evaluate all assistant coaches.

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

**BENEFITS REVIEW- LOCKER ROOMS, PRACTICE AND COMPETITIVE FACILITIES:** There was viewed locker room assignments for all teams except Track, Tennis, Golf, and Archery. The regulations of Title IX are very explicit in that every student has a right for a safe and secure place to dress and store items. Public restrooms are not considered a safe and secure place for a student to dress. If dressing areas are not available at the designated off campus practice and competitive sites for golf, bowling, and swimming, then assignment of locker rooms, at the school, must be made in order to accommodate the student athlete. Interviews with coaches indicated concern with male players and/or coaches utilizing a female locker room space to take showers, etc. This appeared to be occurring during the same practice and/or competitive season for those teams.

The on-campus facilities include those for volleyball, basketball, wrestling, lacrosse, baseball, tennis, softball, archery, football, soccer, and track. All viewed facilities are excellent and well maintained. The off-campus facilities include those for cross country, golf, swimming, and bowling. The cross-country teams practice and/or compete at Jacobsen Park and Masterson Station Park. The golf teams practice and compete at Lakeside Golf Course. The swim teams practice at Transylvania and all scheduled meets are away. The bowling teams practice and compete at Southland Bowling Lanes. There was written and viewed evidence of storage assignment for all on campus teams.

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:** There is one (1) weight room that is located off the hallway by the main gymnasium. It was spacious and equipped with a variety of cardio, free weights, and stationary weight equipment. It appeared that equipment appropriate for female was lacking in the number and availability of free weights, lift bars, bands, and/or weighted balls, etc. There was no evidence of a weight room schedule posted at the site. Usage of the weight room was part of the school facilitron schedule but there was no evidence of a guideline that would ensure, with administrative oversight, the equitable usage and access to the weight room by female student athletes. Interviews with student athletes and coaches indicated usage of the weight room but at times, with limited equitable access. Interviews with administration indicated that athletic training services are provided through a contract with the University of Kentucky Healthcare. Athletic trainers are available on a daily basis and at all home events. Interviews with student athletes and school administration stated that athletic physical exams are the responsibility of each student athlete.

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:** Interviews with administration indicated administrative oversight ensuring the equitable scheduling of cheer as a support group for football, girls and boys basketball games. Currently, it was reported by administration that the school band performs at home football games for their halftime marching performances. The band does not perform at regular season home basketball games. There was written evidence of student recognition that was specific to senior recognition for all the sports teams. This included the size and template of the banner and what sport area/zone it would be displayed. Interviews with student athletes and coaches indicated end-of-season awards recognitions and/or banquets that included school awards, team awards, and letters/bars but there was no written guideline that insured the provision of equity for all sports teams. A two-year review of spending could not be evaluated due to the incomplete reporting of expenditures for the category of Awards on the T-35 form of the 2024 Annual Report.

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

**BENEFITS REVIEW- SUPPORT SERVICES:** All available office space appeared to be assigned equitably. Interviews with administration indicated that the teams without external booster accounts include those for archery, girls' lacrosse, tennis, and bowling. There was evidence of signed booster agreements in the school Title IX file. Interviews with coaches indicated that expenditures from external booster accounts require booster club and/or booster club office approval. It is recommended that a mechanism be put in place for administrative oversight of booster spending. School administration are reminded that it is the institution's (school) responsibility to make up the difference, in benefit expenditures, if a disparity occurs over a two-year period of time. A two-year review of overall spending could not be evaluated due to the lack of expenditure reporting on the T-35 form of the Annual Report in the categories of Equipment/Supplies, Travel/Per Diem, and Recognition (awards). The parameters of spending on a per athlete basis and percentage basis (% participation to % expenditures) could not be determined. Interviews with coaches indicated knowledge of the approval process to purchase items with school funds.

	<b>CURRENT DEFICIENCIES</b>	
<b>Observed Deficiencies in Overall Girls and Boys Athletic Programs</b>	<b>Recommended Actions in relation to Current Deficiencies</b>	<b>Dates for Verification of Action to address deficiency</b>
<b>Accommodation of Student Interests and Abilities</b>	Student Interest Survey is to be completed during the 24-25 school year meeting the required minimum 60% student response return rate. A review of the survey results should be documented on the T-3 form of the 2025 Annual Report.	This will be reviewed upon receipt of the 2025 Annual Report. Deadline for submission of the Annual Report is on or before <b>May 1, 2025</b> .
<b>Scheduling of Games and Practice Times</b>	Develop a guideline which provides the administrative oversight to the equitable scheduling of all shared facilities. This may include, but not be limited to, in season priority, optimal time, and team practice/competitive schedules.  Document and list the number of competitive opportunities provided for all sponsored teams for the 24-25 school year.	Please submit all information, on or before, <b>March 1, 2025</b> to Kathy Johnston at <a href="mailto:kjohnston@khsaa.org">kjohnston@khsaa.org</a> .
<b>Travel and Per Diem</b>	Develop a guideline which provides the administrative oversight of travel and per diem. The travel guideline may include, but not be limited to, the provision for all forms of possible student transport. The per diem guideline may include, but not be limited to, cost provision for meals provided as a benefit to student athletes. This may include pre-game meals, per meal, or daily cost provision.	Please submit all information, on or before, <b>March 1, 2025</b> to Kathy Johnston at <a href="mailto:kjohnston@khsaa.org">kjohnston@khsaa.org</a> .
<b>Medical Training</b>	Review the current weight/conditioning room area and equipment to determine needs and the plan for acquiring more appropriate equipment for female use. Develop a guideline that ensures the equitable usage and access to the weight room by all desired teams. This usage may be identified by team, gender, priority use by season, etc.	Please submit all information, on or before, <b>March 1, 2025</b> to Kathy Johnston at <a href="mailto:kjohnston@khsaa.org">kjohnston@khsaa.org</a> .

<b>Support Services</b>	Review and document the expenditures for the categories of Equipment/Supplies, Travel/Per Diem, and Awards representing the 22-23 school year. This should include all school and booster expenditures that provide support for the benefit for student athletes.	Please submit all information, on or before, <b>March 1, 2025</b> to Kathy Johnston at kjohnston@khsaa.org
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#### RECURRING DEFICIENCIES

<b>Observed Deficiencies in Overall Girls and Boys Athletics Programs</b>	<b>Recommended Actions in relation to recurring deficiencies</b>	<b>Date for Verification of Action to address deficiency</b>
N/A		

#### OTHER ACTIONS NECESSITATED BY THIS VISIT

<b>Action</b>	<b>Due Date</b>
<b>Locker Rooms and Storage areas</b> - Review and list all available locker rooms at FDHS. Designation and assignment of locker rooms for track, tennis, golf, and archery should be made. Verification of this requires each respective coach signature indicating knowledge and designation of his/her locker room for their team.	Please submit, on or before, <b>March 1, 2025</b> to Kathy Johnston at kjohnston@khsaa.org
<b>Student Recognition</b> - Develop a guideline that would include the provisions for student recognition. This may include, but not be limited to, letters/bars, school issued awards, banquets, and team awards.	Please submit, on or before, <b>March 1, 2025</b> to Kathy Johnston at kjohnston@khsaa.org.
<b>Emergency Action Plans</b> - Update the current EAP's to include all teams utilizing those on-campus facilities.	Not for submission. Please update EAP's and place in school Title IX file.

**PERSONNEL IN ATTENDANCE AT FIELD VISIT MEETING**

<b>Name</b>	<b>Title</b>
Logan Bussonn	Student Athlete - football
Demarcus Surratt	Student Athlete - basketball
Phoebe Grier	Student Athlete - golf
Hannah Rogers	Student Athlete - volleyball
Crystal Washington	Head Coach - B/G Track and Field
Megan Adkins	Head Coach - Girls Soccer
Jeremy Dulaney	Athletic Director
Nicole Bersaglia	Title IX Coordinator
Lester Diaz	Principal
Gary Lawson	KHSAA
Kathy Johnston	KHSAA - kjohnston@khsaa.org

**OTHER GENERAL OBSERVATIONS**

School administration were very welcoming and well prepared for the visit. The public forum, scheduled for 3:00 PM, was held in a school conference area in the main school building. With no one in attendance, the audit team left Frederick Douglass High School at approximately 3:35 PM.

There was written evidence of Emergency Action Plans (EAP) for the sports venues of baseball, basketball, auxiliary gym, football, soccer, track, and tennis. There were maps that highlighted each EAP and all sponsored teams/facilities but it appeared that, inadvertently, the teams of softball, volleyball, wrestling, and lacrosse were left off the title pages of each respective EAP. EAP procedures were also included for the off-campus facilities for golf, swim, bowling, and cross country. Interviews with administration also indicated the pre-season training of all coaches regarding EAP procedures. This training is conducted by the athletic director. There was written evidence of four (4) AED devices. They are located in the main lobby, cafeteria, outside the main gym in the athletic wing, and in the fieldhouse (between softball and stadium fields).