



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

KHSAA Form T76
Rev..11/16

School:	Heritage Academy
Prepared By:	Gary W. Lawson
Date of Re-Visit:	December 10, 2019
Staff Reviewed By:	Darren Bilberry, Asst. Commissioner
School Year:	2019-20

ACCOMMODATIONS OF INTEREST AND ABILITIES REVIEW:

OPPORTUNITIES REVIEW (FROM PRIOR YEAR ANNUAL REPORT)	Completed
Test One – Substantial Proportionality	Satisfactory
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: IT SHOULD BE NOTED FOR PURPOSES OF THIS REPORT THAT OVER THE TWO-YEAR PERIOD OF THIS EVALUATION, BOYS ARE DESIGNATED TO BE THE UNDERREPRESENTED GENDER IN REGARD TO ATHLETIC PARTICIPATION ACCORDING TO THE ROSTERS SUBMITTED BY THIS SCHOOL.

The December 12, 2007 Title IX school visit report designated the accommodation of interest and abilities *Satisfactory* based on information indicating that the standards established by all three tests for the provision of athletic opportunities were being met. The September 26, 2013 school visit report also designated this area *Satisfactory* stating that the standards established by both Tests 1 and 3 for the provision of opportunities were being met. The annual summary for the 2018-19 Title IX report shows that the school is currently meeting the standards established by all three tests. When this report was reviewed, it was discovered (and confirmed by administrative interviews during the most recent visit) that this summary was based on the submittal of inaccurate team rosters (i.e. volleyball) . When correct rosters are analyzed, it appears likely that both Tests 1 and 3 are currently being met. School officials were reminded of the need to submit accurate team rosters to KHSAA. The T-63 form in the 2017-18 annual Title IX report documents that a 93.1% return rate was received on the most recent student athletic interest survey. During the December 10, 2019 visit, the school's Title IX file was examined. It was found to contain the two most recent Title IX school visit reports, all the annual Title IX reports since 2000-2001, a listing of the current members of the Gender Equity Review Committee, copies of current game schedules for all varsity teams, a policy addressing the assignment of shared athletic facilities, guidelines addressing recognition of athletic participation and accomplishments (**see *Publicity***), 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 uniform review, rotation, and/or replacement plan, and guidelines addressing the equitable provision of the mode of transportation for student athletes. (**See *Travel and Per Diem Allowances and KHSAA Recommended Action.***) School officials were complemented for the development of these Title IX regulations.

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: The 2007 and 2013 Title IX school visit reports designated this benefit category *Satisfactory*. All the uniforms seen during the most recent visit appeared to be of excellent quality and supplied in equitable quantities. The Title IX file had a uniform review, rotation, and/or replacement plan that indicated uniforms for “like” teams were replaced on equitable rotation cycles. The 2017-18 and 2018-19 annual Title IX reports show the school was spending \$159 per female athlete and \$253 per male athlete for equipment and supplies. THE ONLY NON-COED SPORTS OFFERED DURING THESE TWO YEARS WERE BOYS BASKETBALL AND GIRLS VOLLEYBALL.

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 2007 Title IX school visit report designated this benefit category *Deficient*. The major reason was the school’s failure to provide equitable practice times for boys and girls basketball. The 2013 report designated this benefit category *Satisfactory* and that the school’s gym was now assigned on an equitable basis for basketball practices. Information gathered during the most recent visit indicated that the number of competitive events scheduled for “like” sports and sport activities offered at the school were comparable. The school has a written policy for the assignment of facilities that are shared for practice per gender. Following this policy would provide equitable access. (**See Medical and Training Facilities and Services and KHSAA Recommended Action.**) The scheduling of competitive events during the most opportune times on an equitable basis was discussed with school officials who were commended for providing parity in this endeavor.

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 2007 and 2013 Title IX school visit reports designated this benefit category *Satisfactory*. A review of the Title IX file during the most recent visit revealed that it contained a regulation addressing the equitable provision of the mode of transportation for student athletes, however, there were no regulations for the equitable provision of meals or lodging. (**See KHSAA Recommended Action.**) The 2017-18 and 2018-19 annual Title IX reports show \$0 expenditures for travel and per diem for any of the school's three athletic teams. For the past two years, all student athletic transportation was provided by the parents of participants.

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

BENEFITS REVIEW- COACHING: The 2007 and 2013 Title IX school visit reports designated this benefit category *Satisfactory*. The principal is currently responsible for the evaluation of all head coaches. A written instrument is not used as part of this process. The school did not provide an extra service pay schedule for coaches which could be reviewed during this visit. (**See KHSAA Recommended Action.**) The T-35 form in the 2018-19 annual Title IX report shows that \$2,000 is paid to the boys' basketball coaches and the same amount is paid to the girls' volleyball coaches. The data provided by the athletic director during this visit showed that the coaching ratio was 15 participants per coach for males and 10 participants per coach for females. Information gathered during the visit revealed that the head boys basketball coach and archery coach are on-campus employees and the head volleyball coach is an off-campus employee.

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 2007 Title IX school visit report designated this benefit category *Deficient* citing the disparity in the amenities at the softball complex compared to those at the baseball field. The 2013 report designated this benefit category *Satisfactory* noting that both the baseball and softball fields were “suitable”, but added that fencing was needed for softball. NOTE: NEITHER SOFTBALL NOR BASEBALL IS CURRENTLY OFFERED AT THE SCHOOL. THE ONLY SPORTS OFFERED IN 2017-18 AND 2018-19 WERE BOYS BASKETBALL AND GIRLS VOLLEYBALL ALONG WITH THE CO-ED SPORT ACTIVITY OF ARCHERY. The girls’ volleyball and boys basketball teams share a small gym on the school campus. The archery team practices and competes at the M and M Archery Center located approximately five miles from the school. The archery team has dressing facilities at the M and M Center. Boys basketball and girls’ volleyball have small, exclusive dressing rooms in the gym. These two teams share an equipment storage area located adjacent to the gym. Archery has a storage area adjacent to the office of the athletic director. There was a listing in the Title IX file for the location of all dressing rooms and equipment storage areas.

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	NA	
Physical Exams	NA	

BENEFITS REVIEW- MEDICAL AND TRAINING FACILITIES AND SERVICES: The 2007 and 2013 Title IX school visit reports designated this benefit area *Satisfactory*. No weight training room was available at the time of these previous visits. The tour of facilities during the most recent visit revealed that the school now has a small weight training room adjacent to the gym. The limited amount of available equipment seems to offer training options suitable for female athletes. Although there was a school policy for the sharing of athletic facilities, there was no usage schedule for this facility in the Title IX file or posted at the venue. The reason given for this was that “no one wanted to use the facility after school hours.” Further investigation and student interviews revealed that boys’ basketball team has exclusive use of the weight room during one class period daily. The girls’ volleyball team is not granted this benefit (**access**). Athletes who were interviewed during this visit indicated a definite desire for equitable access. (**See KHSAA Recommended Action.**) The services of an athletic trainer are not available at the present time. All student athletes are responsible for obtaining their own physical examinations.

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 2007 and 2013 Title IX school visit reports designated this benefit category *Satisfactory*. The school has one varsity cheerleading squad that is assigned to cheer at all home boys' basketball games. School officials stated that it would be difficult for the squad to cheer for volleyball because all cheerleaders, except two, play volleyball. The school does not currently have a band. There were regulations in the Title IX file that addressed the equitable provision of awards, a combination academic/athletic banquet, and the posting of banners for athletic recognition. UPON RECEIPT OF THIS REPORT, IT IS REQUESTED THAT THE BANNER REGULATIONS BE EXPANDED TO INCLUDE RECOGNITION FOR INDIVIDUAL AND TEAM ACCOMPLISHMENTS IN KHSAA SANCTIONED EVENTS. The 2018-19 annual Title IX report shows that \$150 was spent for awards for each sport and sport activity sponsored by the school.

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

BENEFITS REVIEW- SUPPORT SERVICES: The 2007 and 2013 Title IX school visit reports designated this benefit category *Satisfactory*. The school has no office space for coaches at this time and there are no athletic booster clubs supporting school teams. Students pay a \$100 fee for each sport in which they participate. The internal summaries for the annual Title IX reports for 2017-18 and 2018-19 show that athletic expenditures for that two-year period favored male participants on a per athlete basis. During 2018-19, 49.35% of the spending was for females who made up 52.38% of the participants. Using the percentage method, this spending appears to be within generally accepted parameters for the provision of parity for a non-football playing school. AS NOTED PREVIOUSLY IN THE *OPPORTUNITIES* SECTION OF THIS REPORT, MALES ARE DESIGNATED AS THE UNDERREPRESENTED GENDER IN ATHLETICS DURING THE PERIOD OF THIS EVALUATIONS according to the rosters submitted by the school.

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
No deficiencies were designated as a result of the December 10, 2019 Title IX school visit.		

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
No deficiencies were designated as a result of the September 26, 2013 Title IX school visit.		

OTHER ACTIONS NECESSITATED BY THIS VISIT

Action	Due Date
(Travel and Per Diem Allowances) The school is to submit to KHSAA an expansion of the current regulations in this benefit category that addresses the equitable provision of <u>meals and lodging</u> for student athletes. Once approved, this document is to be placed in the school's Title IX file.	On or before <u>April 21, 2020</u>
(Coaching) The school is to submit to KHSAA a copy of its extra service pay schedule for coaches. This schedule is to include salaries for all coaches at all levels at the school.	On or before <u>April 21, 2020</u>
(Medical and Training Facilities and Services) The school is to submit to KHSAA a written plan to provide equitable access to the weight training room for female athletes. This plan should include a reasonable date for its implementation and an equitable schedule for after-school usage. The submitted plan should be signed by all members of the Gender Equity Review Committee and the high school administrator.	On or before <u>April 21, 2020</u>

PERSONNEL IN ATTENDANCE AT FIELD VISIT MEETING

Name	Title
Gary W. Lawson	KHSAA
Ellie Blair	Student Athlete
Kellie Wolfe	Student Athlete
Stephanie Edgerly	Archery Coach
Sarah Wiley	Assistant Volleyball Coach
Howard Davis, Jr.	Administrator
Bert Capel	Athletic Director

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 Medical Plan (KRS 160.445). The school had an acceptable plan for the gym.

As per request, the school was requested to list the location(s) of Automated External Defibrillators. According to the Athletic Director, one permanent AED is located on the wall adjacent to the gym.

No one from the community attended the Public Comments session. The meeting was adjourned at 3:20 pm EST.