



**KHSAA TITLE IX RE-VISIT
FINAL AUDIT REPORT**

(For schools re-visited during the 2014-2015 school year)

School: Lloyd Memorial
 Prepared By: Gary W. Lawson
 Date of Re-Visit: October 28, 2014
 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)

	A	Substantial Proportionality
	B	History and Continuing Practice Of Programs Expansion
X	C	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: The rosters and data submitted to KHSAA indicate the school has not met the standard established in prong 1 of the athletics opportunities test during any of the past three school years. The T-1 form in the 2013-14 annual Title IX report shows that the percentage of enrollment for females was 48% and their percentage of athletic participation was 42%.

- 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 submitted in the annual Title IX reports indicate the school has not met the standard established in prong 2 of the athletic opportunities test during any of the past three school years. The 2013-14 annual Title IX report shows that no female teams at any level have been added during the past five years.

- 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

Comments: The responses and information submitted by the school on the T-3 forms in the annual Title IX reports indicate that the standard established in prong 3 of athletic opportunities test has been met during each of the past three school years. The responses on the T-3 form appear to be supported by the information found in the most recent student athletic interest survey.

3. Is the school's most recent Student Interest Survey accurate in relation to the assessment of Interests & Abilities?
Yes No

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

Benefit to Students	Satisfactory	Deficient	Comments
Accommodation of Interests and Abilities	X		<p>The January 16, 2003 Title IX school visit report stated that the school was <i>Satisfactory</i> in this area because it was meeting the standards established in all three prongs of the opportunities test at that time. The February 23, 2007 Title IX school visit report assessed this area as <i>Satisfactory</i> by documenting that the school was meeting the standard established in Prong 2 of the opportunities test. Title IX annual reports for the past three years indicate that the standard of Prong 3 is currently being met. The 2013-14 annual Title IX report shows that the indicated interests of student athletes have been addressed. (See detailed explanation of each of the three prongs of the opportunities test on page 2 of this report.) During the most recent visit, the school's Title IX file was reviewed and found to contain all the annual Title IX reports submitted to KHSAA for the past five years, a board-approved extra service pay schedule for coaches, a list of the current members of the Gender Equity Review Committee, game schedules for all school sponsored sports, a fall sports program which recognized all teams that participate during the fall, a school generated athletic handbook for coaches, a written facility usage schedule for the gym, written guidelines for the posting of banners for athletic recognition in the gym (See <i>Publicity and KHSAA Recommended Action</i>), a written designation of locker room and athletic equipment storage space assigned each team, and written minutes for one Gender Equity Review Committee meeting held during the 2014-15 school year. No minutes were found for the previous two school years, therefore, no meetings could be verified during those years. (See <i>KHSAA Recommended Action</i>). Also found in the Title IX file was a written listing of uniform purchases made with monies not gained through team fund raising (see <i>Equipment and Supplies and KHSAA Recommended Action</i>), a set of written statements relating to student transportation (see <i>Travel and Per Diem Allowances</i> and</p>

<p>Accommodation of Interests and Abilities Continued</p>			<p><i>KHSAA Recommended Action</i>), a copy of an Emergency Medical Plan which <u>was not</u> venue-specific (KRS.160.445) The need for a Title IX file that addresses specific gender equity issues and provides equity in relation to student athletes was emphasized to school officials. IT SHOULD BE NOTED THAT THE SCHOOL'S FILE DID NOT CONTAIN EITHER OF THE PREVIOUS TITLE IX SCHOOL VISIT REPORTS. COPIES OF THESE REPORTS WERE GIVEN TO SCHOOL OFFICIALS BY THE KHSAA REPRESENTATIVE CONDUCTING THE SCHOOL VISIT.</p>
<p>Equipment and Supplies</p>		<p>X</p>	<p>Both the previous Title IX school visit reports deemed this benefit category <i>Satisfactory</i>. The 2003 report suggested that the school develop and implement a uniform review, rotation, and/or replacement plan. The 2007 report stated that there still <u>was not</u> an equitable plan in place which showed a full cycle of rotation. The most recent evaluation indicated that the school had a written document showing some past and some projected uniform purchases. The plan did state that uniforms could be purchased with fund raising monies outside of the designated cycle. The need for an equitable plan of review and replacement was again emphasized to school officials. The uniforms reviewed during the most recent visit were all of mid-to-high quality and appeared to be supplied in equitable quantities except in the case of softball. The softball uniforms were not of the same quality as those provided for baseball. Interviews also suggested that the uniforms as well as "extras", such as hats and belts, were not supplied in equitable quantities. According to information provided in the 2012-13 and 2013-14 annual Title IX reports, the school was spending approximately \$65 per female athlete and \$173 per male athlete for equipment and supplies. This spending <u>significantly favors male athletes</u> and should be closely monitored. Failure to have developed an equitable uniform review, rotation, and/or replacement plan as was requested in the previous school visit reports and a lack of equivalence (in quality and quantity) in the provision of uniforms and the disparity in</p>

			spending for athletes in this benefit category renders the category <i>Deficient</i> . (See KHSAA Recommended Action.)
Scheduling of Games and Practice Time	X		Both the previous Title IX school visit reports rendered this benefit category <i>Satisfactory</i> . Information provided during the most recent visit revealed that the number of competitive events scheduled for teams of "like" sports is comparable. An equitable usage schedule was provided for the gym. The only other shared practice facility was the weight training room which is addressed in the <i>Medical and Training Facilities</i> section of this report. The scheduling of athletic events during the most optimal playing times was discussed with school officials who were commended for the provision of parity regarding this benefit.
Travel and Per Diem Allowances	X		Both the earlier Title IX school visit reports rated this benefit category <i>Satisfactory</i> . The 2007 report documented that some equitable guidelines for provision of these benefits were in place. A review of the Title IX file during the most recent visit showed that there were some general guidelines addressing student transportation that did <u>not</u> address provision of the mode of transport (van, school bus, charter bus, etc.) or provision of per diem (meals and lodging). (See <i>KHSAA Recommended Action</i> .) The data submitted in the 2012-13 and 2013-14 annual Title IX reports show that the school was spending approximately \$42 per female athlete and \$39 per male athlete for travel and per diem.
Coaching	X		Both the 2003 and the 2007 Title IX school visit reports designated this benefit category <i>Satisfactory</i> . The 2007 report did mention a disparity in the number of coaches for softball in comparison to baseball. The school's athletic director is responsible for evaluating all head coaches. A written instrument is used for this evaluation if the coach has less than five years of experience. According to the data submitted on the T-35 form in the 2013-14 annual Title IX report, the total amounts spent for coaching salaries for teams of "like" sports was comparable. A review of the district's extra

Coaching continued		<p>service pay schedule for coaches showed parity except in the case of softball which had two paid coaches while there are three paid baseball coaches. (See <i>KHSAA Recommended Action</i>.) The data provided in the 2013-14 annual Title IX report shows that coaching ratios were one coach per 8.5 participants for both male and female student athletes. When "like" teams were compared there was still a disparity (as there was in 2007) in the total number of coaches for baseball (six) and softball (two). (See T-35 form in 2013-14 annual Title IX report and <i>KHSAA Recommended Action</i>.) Information provided during the most recent visit revealed that 43% (3/7) of the head coaches of girls teams and 57% (4/7) of the head coaches of boys teams are employed on campus.</p>
Locker Rooms, Practice and Competitive Facilities	X	<p>The school was rated <i>Satisfactory</i> in this benefit category by both the previous Title IX school visit reports. The tour of the facilities during the most recent visit showed that the amenities at all the outdoor athletic venues were comparable except at the softball field where the dugouts (constructed from chain link fence) were slightly inferior to the baseball dugouts (concrete blocks). The baseball field also has a working concession stand, and the softball field does not. It should be noted that the softball field does have a tarp and the baseball field does not. Both the softball and baseball fields have outdoor batting cages. (See <i>KHSAA Recommended Action</i>.) As far as indoor facilities are concerned, the equipment storage that is available does appear to be assigned equitably. There is a significant amount of locker room space available, and this space appears to be assigned with equity as a priority. A large coaching office area is being constructed that will house softball, baseball, girls and boys cross country, girls and boys track, girls and boys tennis, and volleyball. Currently, football has an exclusive office and girls and boys basketball share office space.</p>

Medical and Training Facilities and Services	X	<p>The 2003 school visit report deemed this benefit category <i>Satisfactory</i>, but did request that an equitable weight training room usage schedule be developed. The 2007 report rated this category <i>Satisfactory</i> documenting that an equitable usage schedule for the weight training room was in the Title IX file but was <u>not</u> posted at the facility. The most recent visit revealed that the school has an equitable usage schedule posted at the large weight training room near the gym, but this schedule was <u>not</u> found in the Title IX file. <u>School officials were notified that this document needs to be in both places.</u> The weight training room appears to have equipment suitable for use by female athletes. An athletic trainer is provided on a daily basis to both genders through a contract with Nova Care. Physical examinations are available on a designated day each spring for a fee of \$10 through a cooperative effort by the University of Cincinnati Health and Nova Care.</p>
Publicity	X	<p>This benefit category was deemed <i>Satisfactory</i> in both 2003 and 2007. The school currently sponsors two cheerleading squads. The "Fall" squad is selected at try outs held in the spring. This squad is assigned to cheer at all home, away, and post season football games. The "Winter" squad is selected at try outs in November and is assigned to cheer at all home and post season games for girls and boys basketball games. A student can try out for both squads. The full school band performs at all home football games. The pep band performs at an equal number of boys and girls basketball games as monitored by the athletic director. The review of the Title IX file revealed that the school has written guidelines for providing parity in the posting of banners. These guidelines do not address athletic awards, post season banquets, or the criteria for induction into the school's athletic hall of fame. (See <i>KHSAA Recommended Action</i>.) The information found in the 2012-13 and 2013-14 annual Title IX reports indicate that approximately \$15 was spent per male athlete for awards, and the same amount (\$15) was spent for awards for female athletes.</p>

Support Services	X		The previous two Title IX school visit reports rated this benefit category <i>Satisfactory</i> . At the time of the 2007 visit, the school had one booster club that supported all teams. According to school officials, there are currently no athletic booster clubs in existence at Lloyd Memorial. An analysis of athletic spending for the past two years indicates that athletic expenditures in 2012-13 favored female athletes on both a percentage and per athlete basis. Approximately \$569 was spent per female athlete and \$445 per male athlete that year. During 2013-14, expenditures favored male athletes—approximately \$308 was spent per female athlete and \$446 was spent per male athlete. <u>Athletic expenditures should be closely monitored over the next year in an attempt to insure that the current trend does not continue over a two-year period.</u>
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:

- continuing to monitor interest in a girls soccer program;
- upgrading the girls volleyball court;
- monitoring athletic fund raising and expenditures.

6. Observed Deficiencies in Overall Girls and Boys Athletics Programs

One major deficiency was assessed as a result of the October 28, 2014 Title IX school visit in the benefit category of *Equipment and Supplies*. There was a disparity in the quality and quantity of softball uniforms provided in comparison to those for baseball. As was the case in January, 2003 and February, 2007, it could not be verified that an equitable uniform, review, rotation, and/or replacement plan was being followed. The spending within this category reflected the disparities noted above.

Although not rendered deficient, they are "areas of concern" identified in the areas of *Accommodations of Interests and Abilities, Publicity, Locker Rooms, Practice and Competitive Facilities, Travel and Per Diem Allowances, and Coaching* which must be addressed in an attempt to insure that both equitable opportunities and benefits are provided.

7. KHSAA Recommended Action in relation to new deficiencies

(Equipment and Supplies) On or before **January 16, 2015**, the school is to submit to KHSAA a written uniform review, rotation, and/or replacement plan that shows an equitable cycle of review for replacement for school sponsored sports. **THIS PLAN IS TO BE SIGNED BY ALL HEAD COACHES AND ALL MEMBERS OF THE GENDER EQUITY REVIEW COMMITTEE.**

Although the following areas and benefit categories are not considered deficient, the following issues are to be addressed in an effort to prevent the development of future deficiencies.

(Accommodations of Interest and Abilities) On or before **April 24, 2015**, the school is to submit to KHSAA written minutes for at least three Gender Equity Review Committee meetings held during the 2014-15 school year. **Each of the copies of these minutes are to be signed by all committee members in attendance as well as the school principal.**

(Locker Rooms, Practice, and Competitive Facilities) On or before **January 16, 2015**, the school is to submit to KHSAA a plan for addressing the inequities at the softball field. This plan should address upgrading the dugouts and/or provision of a concession stand. This plan should include a **reasonable completion date** for the project which is also to be a part of the school's Title IX Improvement Plan (T-60 form) submitted to KHSAA by **April 30, 2015**. The plan should continue to be included on T-60 forms until the project is completed.

(Coaching) On or before **January 16, 2015**, the school is to submit to KHSAA documentation of the steps being taken to provide equitable access to coaching for softball players. This documentation should address the number of total softball coaches (paid and unpaid) compared to baseball and the provision of an equitable number of coaching stipends for softball commensurate with the number of participants and number of teams sponsored.

(Travel and Per Diem Allowances) On or before **January 16, 2015**, the school is to submit to KHSAA equitable written guidelines for the provision of travel and per diem for student athletes. These guidelines should address the mode of transportation, and the provision of meals and lodging for athletes. The development of these guidelines should be a part of the school's **April 30, 2015** Title IX Improvement Plan (T-60 form) submitted to KHSAA.

(Publicity) On or before **January 16, 2015**, the school is to submit to KHSAA an expansion of the current guidelines in this benefit category that address the equitable provision of athletic awards and post season banquets and the criteria for admission into the school's athletic hall of fame. Documentation of these guidelines should be a part of the school's Title IX Improvement Plan (T-60 form) submitted to KHSAA by **April 30, 2015**.

8. KHSAA Recommended Action in relation to reoccurring deficiencies

No deficiencies were assessed as a result of the February 23, 2007 Title IX school visit.

9. PERSONNEL IN ATTENDANCE AT AUDIT MEETING

High School Title IX Coordinator: Mike Key, 450 Graves Ave., Erlanger, KY 41018
(859) 727-1555

District Level Title IX Coordinator: Shawn Neace, 500 Graves Ave., Erlanger, KY 41091
(859) 727-2009

Name	Title	Telephone
Gary W. Lawson	KHSAA	(502) 545-3393
Jordan M. Gentry	Student Athlete	(859) 727-1555
Rick Walker	Softball Coach	(859) 727-1555
Tyler Teke	Girls Basketball Coach	(859) 727-2255
John Riehemann	Principal	(859) 727-1555
Shawn Neace	Title IX Coordinator/DPP	(859) 727-2009
Hayden Molitor	Student Athlete	(859) 727-1555
Linda Holmes	Finance Director	(859) 727-2009
Pat Sexton	Financial Secretary	(859) 727-1555
Joni Tolle	Parent	(859) 727-1555
Nancy Harris	Assistant Athletic Director	(859) 441-0771
Aaron Moore	Baseball Coach	(859) 912-4661

10. Comments

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