



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

KHSAA Form T76
Rev..11/16

School:	Lloyd Memorial
Prepared By:	Gary W. Lawson
Date of Re-Visit:	January 11, 2024
Staff Reviewed By:	Darren Bilberry, Asst. Commissioner
School Year:	2023-24

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: The October 28, 2014 Title IX school visit report designated the accommodation of student interest and abilities *Satisfactory* based on data submitted by the school that showed the standard established by Test 3 for the provision of athletic opportunities was being met. The report stated that the responses on the T-3 form in the 2013-14 annual Title IX report seemed to support information found in the most recent student athletic survey.

A review of the annual Title IX reports for 2021-22 and 2022-23 show that it is likely the standards established by both Tests 1 and 3 are being met. The 2022-23 **T-1 form** (Test 1) shows that 48.4% of the school's athletes were females and this gender made up 50.4% of the enrollment. Documentation on the T-3 form in the 2022-23 annual report shows that specific steps are being taken to address the indicated interest in soccer, swimming, and E-sports. The school received an 89.9% completion rate on its most recent student athletic interest survey.

During the most recent visit, the school's Title IX file was reviewed and found to contain the two most recent Title IX school visit reports, annual Title IX reports for the past two years, a board-approved extra service pay schedule for coaches, and a listing of the current members of the Gender Equity Review Committee. Also in the file were recent game schedules for all varsity teams, a school-generated athletic handbook, facility usage schedules for all venues that are shared per gender, and regulations regarding awards and recognition of athletic accomplishments. (See **Publicity** and **KHSAA Recommended Action**.) The file also contained minutes for all Gender Equity Review Committee meetings held during the past three years, a uniform review, rotation, and/or replacement plan, and some statements regarding travel and per diem for student athletes. (See **Travel and Per Diem Allowances** and **KHSAA Recommended Action**.) The athletic director and Gender Equity Review Committee were encouraged to continue to work toward the development of a comprehensive Title IX file.

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 2014 Title IX school visit report designated this benefit category *Deficient* based on information showing that the school's uniform review and/or replacement plan did not include "uniforms purchased with fundraising monies." There was also a disparity in the uniforms supplied for the softball team and those for baseball. The spending component of this category also appeared to significantly favor the male participants.

All the uniforms seen during the most recent visit were of mid-to-high quality and appeared to be supplied in equitable quantities except in the case of boys' and girls' basketball. Girls' basketball seemed to have a slight advantage because they were given a shooting (warm-up) shirt, and the boys were not. A uniform review, rotation, and/or replacement plan showing a full cycle of replacement for all teams was part of the Title IX file. This plan showed a four-year cycle of replacement for all teams. Interviews with student athletes and coaches during this visit indicated knowledge of this plan.

The 2021-22 and 2022-23 Title IX annual reports show that the school spent \$105 per female athlete and \$210 per male athlete for equipment and supplies. As was true in 2014, this spending seems to favor male participants. (See **Support Services** and **KHSAA Recommended Action**.)

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 2014 Title IX school visit report designated this benefit category *Satisfactory*. Information gathered during the most recent visit indicated that the number of competitive events scheduled for teams of "like" sports was comparable. The school has three venues that are shared per gender for practice—the indoor hitting facility, the main school gym, and the weight training room. A usage schedule for each of these venues showing equitable female access was part of the school's Title IX file. The scheduling of competitive events during the most optimal playing times was discussed with school officials who were encouraged to strive for parity in regard to this benefit component.

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 2014 Title IX school visit report designated this benefit category *Satisfactory*. The report documented that the school did not have regulations to address the equitable provision of travel and per diem—mode of transportation, meals, lodging—for student athletes.

During the most recent visit, the Title IX file contained some statements regarding the mode of transportation, and provision of meals and lodging for student athletes. However, there were no equitable guidelines related to parity of per diem—meals and lodging. (See *KHSAA Recommended Action*.)

The T-35 form in the 2022-23 annual Title IX report, the school spent no money for travel and per diem for female teams while a total of \$3,500 was spent for two male teams—basketball and football. This spending, as submitted, favors male participants. This benefit category is rendered **deficient** as a result of the school’s lack of equitable regulations to ensure parity of travel and per diem, and the information submitted indicates that expenditures for this benefit significantly favored male participants. (See *KHSAA Recommended Action*.)

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

BENEFITS REVIEW- COACHING: The 2014 Title IX school visit report designated this benefit category *Satisfactory*. The report documented that there were three paid baseball coaches and two paid softball coaches. When the total number of coaches for baseball and softball were compared, there was still a disparity. Baseball had six coaches and softball had two.

Interviews with administrators during the most recent visit indicated that the athletic director is responsible for the evaluation of all head coaches. A written instrument is used for documentation of this process. A review of the district’s extra service pay schedule for coaches indicated parity in amounts compensated for “like” positions and the total number of compensated positions for “like” sports. The T-35 form in the 2022-23 annual Title IX report shows that the total amounts spent for coaching salaries for teams of “like” sports was comparable. Data gathered during this visit indicated that the coaching ratio was 7.7 participants per coach for female athletes and 6.0 participants per coach for male athletes. Additional data showed that 57% (4/7) of the head coaches of girls’ teams and 71% (5/7) of the head coaches of boys’ teams are 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 2014 Title IX school visit report designated this benefit category *Satisfactory*. The report noted some disparities between the baseball and softball fields. The disparities included the dugouts and availability of a working concession stand.

The tour of facilities during the most recent school visit revealed that the on-campus softball and baseball fields now offer similar amenities. Both venues have block dugouts, and neither facility has a working concession stand. All the other indoor and outdoor venues have similar amenities for “like” sports. According to the Title IX file and the athletic director, there is an assigned equipment storage space for each team. The tour of facilities showed that several of these storage areas are the showers in the teams’ dressing rooms. It is recommended that the GERC explore alternatives for the teams using showers for storage. All the dressing room space assigned appeared to be equitable for “like” sports.

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 2014 Title IX school visit report designated this benefit category *Satisfactory*. At that time, the school did not have a copy of the usage schedule for the weight training room in the Title IX file.

The tour of facilities during the most recent school visit revealed that the school has a large and well-equipped weight training room in the hall adjacent to the gym. This venue houses numerous training options that are suitable for use by female athletes. The Title IX file contained a usage schedule for the weight room that seemed to indicate equitable female access to this facility. According to the athletic director, the usage schedule is posted on the entry door to the facility, but on the day of this visit, it had been removed. An athletic trainer is available on an equitable, daily basis through a contract with Nova Care. Student athletes are responsible for 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 2014 Title IX school visit report designated this benefit category *Satisfactory*. The report noted that the regulations for this benefit did not address parity in regard to athletic awards, post-season banquets, or the criteria for induction into the school's Athletic Hall of Fame.

The school currently has one varsity cheerleading squad that is assigned to cheer at all home football games and at home boys and girls basketball games. The band performs at all home football games if they are not involved in a band competition that weekend. The pep band plays at an equal number of home games for both boys and girls' basketball as monitored by the athletic director for the provision of equivalence. The Title IX file contained regulations addressing the provision of parity in regard to the posting of banners for athletic recognition as well as post-season banquets. The GERC, along with the athletic director, were requested to review and update the banquet guidelines and make them available to all coaches. Interviews with student athletes and coaches during this visit indicated that banquet regulations were not being followed. In addition, interviews also indicated that the regulations for equitable awards were not being followed either. (See ***KHSAA Recommended Action.***) The school does not have an athletic hall of fame or retire athletic jerseys. The 2022-23 annual Title IX report shows that \$4.00 per female athlete and \$3.60 per male athlete was spent for awards and athletic recognition.

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

BENEFITS REVIEW- SUPPORT SERVICES: The 2014 Title IX school visit report designated this benefit category *Satisfactory*.

The school currently has exclusive office space for football and a shared office for boys and girls basketball. According to school administrators, there are no booster clubs providing support for any of the athletic teams. An analysis of the total athletic expenditures for the past two years shows the following:

2021-22—40.89% of the spending was for female athletes who made up 46.96% of the participants. 59.11% of the spending was for male athletes who made up 53.04% of the participants or approximately \$509 per female athlete and \$652 per male athlete for total support.

2022-23—38.71% of the spending was for female athletes who made up 48.43% of the participants. 61.3% of the spending was for male athletes who made up 51.57% of the participants or approximately \$451 per female athlete and \$671 per male athlete for total support.

According to data submitted by the school, total athletic expenditures favor the male participants on both a percentage and per athlete basis. This benefit category is designated **deficient**. (See **KHSAA Recommended Action**.)

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>(Travel and Per Diem Allowances) The school currently does not have equitable regulations regarding the provision of per diem—meals and lodging—for student athletes.</p>	<p>The school is to submit to KHSAA written regulations addressing the equitable provision of meals and lodging for student athletes. The submitted regulations should be signed by all members of the GERC and all head coaches. Upon approval, these regulations are to become a part of the Title IX file.</p>	<p>On or before <u>March 28, 2024</u></p>
<p>(Support Services) The athletic expenditures submitted by the school for the past two years show that this spending is outside of acceptable parameters for the provision of parity for a football-playing school.</p>	<p>The school is to submit to KHSAA the summary of a self-study of athletic expenditures for the past two years. This summary should include, but not be limited to, the benefit categories and “like” teams where spending favors the male participants. The second part of this submittal is to include a plan for the control and/or oversight of expenditures which would bring this spending into parity within two years.</p>	<p>On or before <u>March 28, 2024</u></p>

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 benefit category of Equipment and Supplies designated by the 2014 school visit report appears to have been addressed by the provision of equitable uniforms for “like” teams and the development and implementation of a uniform review, rotation, and/or replacement plan with equitable cycles of replacement for all teams.</p>		

OTHER ACTIONS NECESSITATED BY THIS VISIT

Action	Due Date
(Publicity) The school is to submit to KHSAA written regulations addressing the provision of parity in regard to awards for athletic participation and/or accomplishments. Upon approval, these regulations should become a part of the school's Title IX file.	<u>On or before March 28, 2024</u>

PERSONNEL AT FIELD VISIT MEETING

Name	Title
Jonah Purnell	Student Athlete
Brooklyn Auderc	Student Athlete
Paul Sturgeon	Girls Basketball Coach
Chris Fogt	Girls Softball Coach
Shawn Neace	Title IX District Coordinator
Mike Key	Principal
Bill Pilgram	Athletic Director
Stacey McNabb	Parent
Julie Purnell	Parent
Daniel E. Dempsey	Assistant Athletic Director
Kyle Niederman	Asst. Principal/Head Football Coach
Lisa Goetz	Finance Director
Gary W. Lawson	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 Medical Plan (KRS 160.445). The plan presented was comprehensive and venue-specific as required by the statute.

As per request, the school was asked for a listing of the locations of its Automated External Defibrillators. It was confirmed that AED's were in the following locations: (1) on the wall in the main gym; (2) on the wall outside the athletic director's office; (3) in the hallway adjacent to the main high school office; (4-7) four portable AED's are provided for "in season" teams; (8) a portable AED is in possession of the athletic trainer.

No one from the community attended the Public Comments session which was advertised in the *Parent Newsletter* from the school and on the school's Facebook page. The meeting was adjourned at 3:15 EST.