



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

KHSAA Form T76  
Rev..11/16

School:	Ludlow
Prepared By:	Gary W. Lawson
Date of Re-Visit:	November 1, 2022
Staff Reviewed By:	Darren Bilberry, Asst. Commissioner
School Year:	2022-23

**ACCOMMODATIONS OF INTEREST AND ABILITIES REVIEW:**

<b>OPPORTUNITIES REVIEW (FROM PRIOR YEAR ANNUAL REPORT)</b>	<b>Completed</b>
<b>Test One</b> – Substantial Proportionality <span style="float: right;"><b>SATISFACTORY</b> (females)</span>	
<b>Test Two</b> – History of Continuing Practice of Program Expansion	
<b>Test Three</b> – Full and Effective Accommodation of Interest and Abilities <span style="float: right;">N/A Covid 19</span>	
<b>Analysis Form Review</b>	<b>X</b>

**ACCOMMODATIONS OF INTEREST AND ABILITIES NOTES:** The January 25, 2007 and the September 22, 2014 Title IX school visit reports rated the accommodation of student interests and abilities *SATISFACTORY*. In 2007, the school had met the standard of substantial proportionality (Test 1) for three consecutive years. Test 3 was not met in 2007 due to the lack of documentation that the student interests in girls' tennis and swimming had been followed up on. The 2014 report stated that is appeared the standards established by both Tests 1 and 3 were being met. A review of the annual Title IX reports for the past two years shows that, according to rosters submitted by the school, males are the underrepresented gender in athletic participation. The school seems to meet Test 1 for females. Females make up 55.29% of athletic participants while they are 44.13% of enrollment. (IT SHOULD BE NOTED THAT THE INTERNAL AUDIT SUMMARY ADDRESSES MALES AS THE UNDERREPRESENTED GENDER). The T-3 form indicates that the standard is being met for Test 3, but there is no information in the report showing that the indicated interests in golf (11) and archery (19) have been addressed for validity. NOTE: According to internal audit summaries, Test 3 has not been evaluated for the past two years due to covid 19 concerns. According to the T-63 form in the 2021-22 annual report, the school received a 75.4% completion rate on the most recent student athletic interest survey. During the November 1, 2022 visit, the Title IX file was reviewed. It contains a school district approved extra service pay schedule for coaches, a listing of the current members of the Gender Equity Review Committee, current game schedules for all school teams. (See *KHSAA Recommended Action*.) The file also had a school-generated athletic handbook for student athletes, a written booster club agreement, facility usage schedules for all shared athletic venues, guidelines regarding awards and recognition of athletic accomplishments for both genders, a written designation of the locker rooms and athletic equipment storage space assigned each team, minutes for only one GERD meeting which was held during the current school year. No minutes were made available for the past three school years. (See *KHSAA Recommended Action*.) The Title IX file also had a uniform review, rotation, and/or replacement plan, and regulations addressing the equitable provision of travel and per diem. School officials were commended for the development of a well organized and 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** Both the 2007 and 2014 Title IX school visit reports rated this benefit category *SATISFACTORY*. The 2014 report documented a difference in the quantity and quality of the uniforms supplied for the softball team compared to those of baseball. The spending in this category also appeared to favor male athletes at the time of the 2014 visit. All uniforms and equipment seen during the most recent visit were mid-to-high quality and seemed to be supplied in equitable quantities. The Title IX file had a uniform review/replacement plan that showed all school teams were on a five-year cycle of replacement. Interviews with student athletes and coaches indicated adherence to this plan. Information in the 2020-2021 and 2021-22 annual Title IX reports show that the school is spending \$358 per male athlete and \$109 per female athlete for equipment and supplies. It should be noted that **MALES ARE RECOGNIZED AS THE UNDERREPRESENTED GENDER IN ATHLETICS AT THIS SCHOOL.**

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 and 2014 Title IX school visit reports rated this benefit category *SATISFACTORY*. The 2014 report stated that an equitable usage schedule was not provided for the outdoor hitting facility shared by baseball and softball. Information gathered from the athletic director during the most recent visit confirmed that the number of competitive events for teams of “like” sports was comparable except in the case of baseball (31 games) and softball (21 games). (See *KHSAA Recommended Action*). Facility usage schedules showing equitable access for both genders were available for the gym, weight training room, practice field shared by football and girls’ soccer, and the indoor batting cage. The scheduling of athletic events during optimal playing times on an equitable basis for both genders was discussed with school officials who were encouraged to make this a priority.

<b>BENEFIT</b>	<b>Satisfactory</b>	<b>Deficient</b>
<b>TRAVEL AND PER DIEM</b>	<b>X</b>	
<b>INDIVIDUAL COMPONENTS</b>	<b>Acceptable</b>	<b>Needs Improvement</b>
Mode of transportation	<b>X</b>	
Provision for meals and housing	<b>X</b>	
Equity of spending	<b>X</b>	

**BENEFITS REVIEW- TRAVEL AND PER DIEM:** The 2007 and 2014 Title IX school visit reports rated this benefit category *SATISFACTORY*. According to the 2014 report, the written regulations for this benefit did not address the equitable provision of lodging for student athletes on overnight trips. At the time of the most recent visit, the school had equitable regulations addressing the mode of transportation and the provision of meals and lodging for student athletes. The Gender Equity Review Committee was requested to review and update the wording of these regulations. Interviews held during the visit seemed to indicate knowledge of and adherence to these policies. Data in the 2020-21 and 2021-22 annual Title IX reports show that \$21.50 per male athlete and \$15.50 per female athlete was spent for athletic travel and per diem.

<b>BENEFIT</b>	<b>Satisfactory</b>	<b>Deficient</b>
<b>COACHING</b>	<b>X</b>	
<b>INDIVIDUAL COMPONENTS</b>	<b>Acceptable</b>	<b>Needs Improvement</b>
Compensation	<b>X</b>	
Accessibility		<b>X</b>
Competence	<b>X</b>	

**BENEFITS REVIEW- COACHING:** The two previous Title IX school visit reports rated this benefit category *Satisfactory*. The 2014 report stated that the salary schedule presented at the time of the visit did not show the specific salaries for each coach employed by the school. During the most recent visit, it was learned that the school's athletic director is responsible for the evaluation of all head coaches. A written instrument is currently being used for documentation of this process. The extra service pay schedule for coaches was reviewed and found to be equitable. The T-35 form in the 2021-22 annual Title IX report shows that the total amounts spent for coaching salaries for teams of "like" sports was comparable. Information gathered during the most recent visit indicated that the coaching ratio for females is nine participants per coach and 6.5 participants pr coach for male athletes. Data provided by the athletic director indicated that 33% (2/6) of head coaches of girls' teams and 60% (3/5) of head coaches of boys' teams are on-campus employees. Accessibility to coaching seems to slightly favor male participants.

<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:** The 2007 and 2014 school visit reports rated this benefit category *Satisfactory*. The 2014 report listed numerous needs at both the off-campus baseball and softball fields. One particular need that was requested to be addressed was to have an outfield fence at the softball field. The tour of facilities during the most recent visit showed that each school team seems to have a safe and secure dressing area. All the dressing room space is shared and appears to be assigned equitably. Each team also has a space to store athletic equipment. The equipment storage space is in very short supply, but the available areas seem to be assigned equitably. There is a significant disparity in the practice and competitive venues of softball and baseball which are both located in Ludlow City Park across the street from the high school. The differences in these facilities include, but are not limited to the following:

Baseball has high quality permanent fencing. Softball has plastic, portable fencing.

Baseball has large, electric inning by inning scoreboard. Softball has no scoreboard.

Baseball has a turf infield. Softball has a skinned, not very well-maintained infield.

Baseball has a well-maintained grass outfield with sprinkler system. Softball has a poorly-maintained outfield with no sprinkler system.

This situation offers several challenges for school officials. (See *KHSAA Recommended Action*.) This benefit category is not deemed *deficient* at this time due to the fact that boys are designated as the underrepresented gender by the internal analysis summary compiled by KHSAA. All other practice and competitive venues appear to offer an equivalence of benefits.

<b>BENEFIT</b>	<b>Satisfactory</b>	<b>Deficient</b>
<b>MEDICAL AND TRAINING FACILITIES AND SERVICES</b>	<b>X</b>	
<b>INDIVIDUAL COMPONENTS</b>	<b>Acceptable</b>	<b>Needs Improvement</b>
Weight room location and access	<b>X</b>	
Weight room usage schedule	<b>X</b>	
Appropriate equipment for female use	<b>X</b>	
Athletic Training services	<b>X</b>	
Physical Exams	<b>X</b>	

**BENEFITS REVIEW- MEDICAL AND TRAINING FACILITIES AND SERVICES:** The 2007 and 2014 Title IX school visit reports rated this benefit category *Satisfactory*. The tour of facilities during the most recent visit showed the school has a large, very well-equipped weight training room located adjacent to the gym. It is easily accessible and has numerous training options that are suitable for female student athletes. There was an equitable usage schedule for both genders in the Title IX file and posted at the facility. Interviews with coaches and student athletes confirmed female use of the facility as well as equitable access. An athletic trainer is available daily on an equitable basis through a contract with St. Elizabeth Hospital. Free physical examinations are given to any student athlete each year on two designated days by St. Elizabeth Hospital.

<b>BENEFIT</b>	<b>Satisfactory</b>	<b>Deficient</b>
<b>PUBLICITY</b>	<b>X</b>	
<b>INDIVIDUAL COMPONENTS</b>	<b>Acceptable</b>	<b>Needs Improvement</b>
Support group assignments	<b>X</b>	
Written regulation for recognition	<b>X</b>	
Equity of spending	<b>X</b>	

**BENEFITS REVIEW- PUBLICITY:** The 2007 and 2014 Title IX school visit reports rated this benefit category *Satisfactory*. The 2014 report requested that the regulations in this area be expanded to include equitable athletic banquets and equitable criteria regarding induction into the school's athletic hall of fame. The school currently has two cheerleading squads—one for varsity football and another for varsity basketball. All cheerleaders are selected at the same time. Generally speaking, cheerleaders who are not involved in fall sports cheer for the football team, and cheerleaders who do not participate in winter sports cheer for the boys' and girls' basketball teams. The football squad cheers at all home and away varsity games. The basketball squad cheers at all home boys and home girls' basketball games. The band performs at all home football games. The pep band plays at a comparable number of home boys and home girls basketball games as monitored for parity by the athletic director. There were equitable regulations in the Title IX file addressing the posting of banners recognizing athletic accomplishments, the provision of awards, and post-season banquets. There was also a listing of the criteria for an individual's induction into the hall of fame. Information in the 2020-21 and 2021-22 annual Title IX reports show that the school was spending \$17 per male athlete and \$14 per female athlete for awards and recognition.

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

**BENEFITS REVIEW- SUPPORT SERVICES:** The 2007 and 2014 Title IX school visit reports rated this benefit category *Satisfactory*. The 2014 report documented that total athletic spending for school years 2012-13 and 2013-14 appeared to favor male athletes. THE REPORT STATED THAT SCHOOL OFFICIALS SHOULD MONITOR SPENDING FOR THE PROVISION OF PARITY AND IMPLEMENT CORRECTIVE ACTION. The school currently has two coaching offices—one in the gym that is shared by boys basketball, girls basketball, baseball, softball, and volleyball and the other office in the fieldhouse is shared by football, girls soccer, boys cross country, girls cross country, boys track, and girls track. Office space is limited, but seems to be assigned equitably. The school has one athletic booster club at this time which supports all school teams. The booster club houses its funds outside of school accounts. There is a signed agreement with the booster club which states that any purchase it makes must be approved in writing by the school’s athletic director. A review of total athletic spending for the past two years shows that in, 2021-22, the school spent \$515.50 per female athlete and \$949.77 per male athlete. This translates into spending 38% of total support for female athletes who made up 53% of the participants compared to 62% on males who made up 47% of the participants. For 2021-22, athletic spending per female athlete was \$434.56 and \$869.30 per male athlete. This again means that 38% of funds were spent for female athletes who made up 55% of participants while 62% of funds were spent on males who were 45% of participants. Given this data, it appears that male athletes have a significant advantage in regard to spending for athletic benefits. According to rosters submitted by the school for the past two years, the internal analysis form compiled by KHSAA shows that boys are the *underrepresented gender* in athletics at Ludlow High School. Therefore, no corrective action is required at this time.

**CURRENT DEFICIENCIES**

<b>Observed Deficiencies in Overall Girls and Boys Athletics Programs</b>	<b>Recommended Actions in relation to current deficiencies</b>	<b>Date for Verification of Action to address deficiency</b>
<b>None</b> — 1/01/22 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
<b>None</b> —2014 Title IX School Visit		

### OTHER ACTIONS NECESSITATED BY THIS VISIT

Action	Due Date
<p><b>(Accommodation of Student Interests and Abilities)</b>                      The school is to submit to KHSAA minutes for at least <u>three</u> Gender Equity Review Committee meetings held during the 2022-23 school year. These should be signed by the committee members in attendance.</p>	On or before <b><u>April 27, 2023</u></b>
<p><b>(Scheduling of Games and Practice Times)</b>                      The school is to submit a completed schedule for baseball and for softball for the 2022-23 season. These schedules should show an equivalent number of games. These schedules are to be signed by the head baseball and softball coaches and the athletic director.</p>	On or before <b><u>January 20, 2023</u></b>
<p><b>(Locker Rooms, Practice and Competitive Facilities)</b> The school is to submit to KHSAA a <u>draft for a plan</u> for improving the amenities at the softball field. This plan should include, but not be limited to, the areas listed in the body of this report. This <u>proposed project plan</u> will be official when it is shown on the <u>T-60 form</u> in the annual Title IX report.</p>	On or before <b><u>January 20, 20223</u></b>  On or before <b><u>April 30, 2023</u></b>



### PERSONNEL IN ATTENDANCE AT FIELD VISIT MEETING

Name	Title
Olivia King	Student Athlete
Breckin Ralston	Student Athlete
Adam Wise	Track/Cross Country Coach
Beth Pelgen	Volleyball Coach
John B. McMullen	Athletic Director
Michael Borchers	Superintendent
Jodi Schmidt	Athletic Director
Greg Taphouse	Athletic Director
Travis Caudill	Principal
Gary W. Lawson	KHSAA

### OTHER GENERAL OBSERVATIONS

Although not part of the current Title IX evaluation, per request, the school provided a copy of its Athletic Facility Emergency Medical Plan (KRS 160.445). The plan was comprehensive and venue-specific as required by the statute.

Per request, the school provided a listing of the locations of its Automated External Defibrillators. AED's were found in the following locations: high school office hallway, outside the elementary school office, in the district nurse's office, high school gym concession stand, trainer's office at the football stadium, and a mobile unit transported by the trainer.

No one from the community attended the Public Comments session which was advertised on the school marquee and the school website. The school's athletic directors were commended for their preparation for this school visit. The meeting was adjourned at 3:25 EDT.