



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

KHSAA Form T76
Rev..11/16

School:	Middlesboro High School
Prepared By:	Gary W. Lawson
Date of Re-Visit:	January 10, 2023
Staff Reviewed By:	Darren Bilberry, Asst. Commissioner
School Year:	2022-23

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	
Analysis Form Review	X

ACCOMMODATIONS OF INTEREST AND ABILITIES NOTES: Both the April 21, 2005 and the November 15, 2012 Title IX school visit reports rated the Accommodation of Interest and Abilities *SATISFACTORY*. It appeared in 2005 that the school was meeting the standard established by Test 2. The data submitted in 2012 indicated that the standards of both Tests 1 and 3 were being met. A review of the annual Title IX reports for the past two years show that the school currently seems to be meeting the standard established by Test 1 for provision of athletic opportunities. During both 2020-21 and 2021-22 the girls percentage of participation was within three percent of their enrollment in the school. For the past two years, Test 3 has not been evaluated due to covid 19 concerns. Inspection of school reports indicate a return rate of 80.3% was received on the most recent student athletic interest survey. It appears that if the indicated interest in archery were pursued for validity, the standard of Test 3 would also be met. During the most recent school visit, the Title IX file was reviewed. It contained a board-approved extra service pay schedule for coaches, a listing of the current members of the Gender Equity Review Committee, sample game schedules for all varsity teams, facility usage schedules for the weight training room, the east end gym, and the high school gym. (See **Scheduling of Games and Practice Times and KHSAA Recommended Action.**) The file had guidelines addressing the posting of banners for athletic recognition (See **Publicity and KHSAA Recommended Action**), written designation of the locker room and athletic equipment storage space assigned each team, one set of minutes for a Gender Equity Review Committee meeting held in 2022-23. (See **Accommodation of Interest and Abilities and KHSAA Recommended Action.**) There was also a written uniform review, rotation, and/or replacement plan, and some vague statements regarding the mode of transportation of student athletes. (See **Travel and Per Diem Allowances and KHSAA Recommended Action.**) The athletic director and Gender Equity Review Committee were strongly encouraged to work toward the development and implementation of regulations addressing parity in regard to opportunities and benefits for student athletes.

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 2005 and 2012 Title IX school visit reports rated this benefit category *SATISFACTORY*. The 2012 report noted that the school had an equitable uniform replacement plan, but, according to interviews with coaches and student athletes, the plan was not being implemented. All uniforms examined during the most recent school visit were of mid-to-high quality and seemed to be supplied in equitable quantities. A uniform review, rotation, and/or replacement plan showed all teams were on a four-year cycle of replacement except for bass fishing which has their uniforms replaced annually. Interviews with student athletes and coaches gave some indication that this plan was being followed. The 2020-21 and 2021-22 Title IX annual reports showed the school was spending \$146 per male athlete and \$117 per female athlete for equipment and supplies.

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 previous two Title IX school visit reports rated this benefit category *SATISFACTORY*. The 2012 report recommended that school officials develop a schedule and/or calendar with equitable opportunities for use of all facilities that are shared by gender. Information gathered during the most recent school visit indicated that the number of competitive events scheduled for teams of “like” sports was comparable. The school currently has four venues that are shared per gender for practice. They are the weight training room, the east end gym, the high school gym, and the soccer field. A usage schedule for each of these venues except the soccer field was available and showed equitable female access. (See **KHSAA Recommended Action**.) School officials were encouraged to continue to emphasize equity in regards to scheduling competitive events during optimal playing times.

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 2005 and 2012 Title IX school visit reports rated this benefit category *SATISFACTORY*. The 2012 report stated that the school had no equitable regulations for addressing the provision of per diem. At the time of the most recent school visit, there were no equitable regulations available concerning the mode of transportation, meals, or lodging for student athletes. Interviews with coaches and athletes seemed to indicate that no consistent plan was being followed. Because two of the three major components of this benefit category could not be confirmed, the category is currently **deficient**. (See **KHSAA Recommended Action**.) The 2020-21 and 2021-22 Title IX annual reports show the school was spending \$131 per male athlete and \$161 per female athlete for travel and per diem.

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

BENEFITS REVIEW- COACHING: The two previous Title IX school visit reports rated this benefit category *SATISFACTORY*. Information gathered during the most recent visit revealed that the athletic director is responsible for evaluating all head coaches. A written instrument is not used for documentation of this process. A review of the district's extra-service pay schedule showed parity. A review of 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. Evidence provided during the most recent visit indicated that the coaching ratio is 9 participants per coach for females and 7.2 participants per coach for males. Other data showed that 88% (7/8) of head coaches of girls teams and 75% (6/8) of 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: Both the 2005 and 2012 Title IX school visit reports rated this benefit category *SATISFACTORY*. Some disparities were documented by the 2012 report as follows: (1) the boys and girls basketball dressing rooms had a shared restroom; (2) the girls basketball dressing room had no electrical outlets; (3) the boys and girls cross country teams had no assigned equipment storage space. The tour of facilities during the most recent visit showed that the issues with boys and girls basketball dressing rooms had been addressed. These dressing rooms have been renovated and contain excellent amenities including private restroom areas and electrical outlets. The school has a significant shortage of locker room space. Boys' and girls' basketball teams have exclusive dressing rooms with quality amenities. All other girls' teams, except golf, use a small room near the gym as their dressing area. The room has no restrooms or shower facilities. All the other boys' teams share a dressing room which appears to be used mostly by football. This area has superior amenities (restrooms and lockers) compared to the girls' facility. DURING THIS VISIT, THE G E R C WAS REQUESTED TO ADDRESS THE ASSIGNMENT OF LOCKER ROOM SPACE AT THE SCHOOL AND DOCUMENT THEIR RECOMMENDATIONS FOR CHANGE ON THE T-60 FORM (School Improvement Plan) ON OR BEFORE APRIL 30, 2023. The school has a significant shortage of athletic equipment storage space, but the available space appears to be assigned commensurate to the size of the teams and the proximity to the competitive and/or practice venue. All the practice and competitive facilities at the school are well maintained and venues for "like" sports appear to have comparable amenities.

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: Both the previous Title IX school visit reports rated this benefit category *SATISFACTORY*. The tour of facilities during the most recent visit revealed that the school has a large and well-equipped weight training room in the gym that has numerous training options that appeared suitable for use by female athletes. Interviews with student athletes seemed to confirm equitable access to this facility. A usage schedule showing equitable access for females was in the Title IX file, but was not posted at the venue. (See **KHSAA Recommended Action**.) An athletic trainer is available on an equitable basis daily through a contract with Evaluation Physical Therapy. The Middlesboro Appalachian Regional Hospital gives free physical exams on a designated day each year at the high school.

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 2005 and 2012 Title IX school visit reports rated this benefit category *SATISFACTORY*. The 2012 report noted some disparities within this category. (1) It was recommended the school develop and implement an equitable written regulations addressing awards for athletic recognition. (2) The T-35 form in the annual reports had *budgeted amounts* rather than *actual expenditures*. The school currently has one varsity cheerleading squad that is assigned to cheer at all home and away football games except those played during fall break. They are also assigned to cheer at all home boys and girls basketball games and at away games with district opponents for both teams. The full band plays at all home football games. A pep band plays at all home boys and girls basketball games with district opponents. The Title IX file had written regulations addressing the posting of banners for athletic recognition. There were no regulations regarding equitable provision of awards and post-season banquets or the criteria for induction into the Athletic Hall of Fame. (See *KHSAA Recommended Action*.) The 2020-21 and 2021-22 annual Title IX reports shows that the school spent \$23 per male athlete and \$11 per female athlete for awards and recognition.

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

BENEFITS REVIEW- SUPPORT SERVICES: The 2005 Title IX school visit report rated this benefit *DEFICIENT* because the school failed to submit accurate total expenditures for the requested benefit categories. The 2012 report rated this category *SATISFACTORY* stating that there was improvement in the accuracy of the data submitted, and spending appeared to be within acceptable parameters for parity. The report also noted that the school had no process in place for the oversight of booster spending to insure equivalence. The school currently has three exclusive coaching offices. One is for boys basketball, one is for girls basketball, and the other is for football. According to the athletic director, the school has booster clubs supporting all teams except boys and girls soccer, softball, boys and girls track, girls and boys cross country, girls and boys tennis, and boys and girls golf. All booster clubs house their funds outside of school accounts. The school's athletic director/principal stated that the purchase order process must be followed for all booster purchases from those outside accounts. It appears that administrative oversight is in place to monitor booster expenditures. The internal audit summaries for the past two years show that in 2020-21, total athletic spending was within generally accepted parameters for the provision of parity on both a percentage and per athlete basis. In 2021-22, the spending was slightly outside of acceptable parameters. When the two years of this evaluation are averaged, the school spent approximately \$555 per female athlete and \$656 per male athlete for total support.

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 did not provide evidence of the provision of parity in regard to mode of transportation, meals, or lodging for student athletes.</p>	<p>The school is to submit to KHSAA regulations addressing equitable provision of <u>mode of transportation, meals, and lodging for student athletes</u>. The regulations are to become part of the school's Title IX file and must be signed by all head coaches and all members of the Gender Equity Review Committee.</p>	<p>On or before <u>March 20, 2023</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>No deficiencies were assessed by the November 15, 2012 Title IX school visit report.</p>		

OTHER ACTIONS NECESSITATED BY THIS VISIT

Action	Due Date
<p>(Scheduling of Games and Practice Times) The school is to submit to KHSAA a usage schedule for the <u>soccer field</u> showing equitable access for team practices. This document is to be signed by all members of the Gender Equity Review Committee.</p>	<p>On or before <u>March 20, 2023</u></p>
<p>(Publicity)</p> <ol style="list-style-type: none"> (1) The school is to submit to KHSAA written regulations addressing provision of parity for student athletes in regard to awards for athletic recognition and participation. The document is to be signed by all member of the Gender Equity Review Committee and all head coaches. (2) The school is to submit to KHSAA written regulations addressing equitable provision for student athletes in regard to post-season banquets. This document is to be signed by all members of the Gender Equity Review Committee and all head coaches. (3) The school is to submit to KHSAA the criteria/and or process required for induction into the school's Athletic Hall of Fame. This document is to be signed by the principal. 	<p>On or before <u>March 20, 2023</u></p> <p>On or before <u>March 20, 2023</u></p> <p>On or before <u>March 20, 2023</u></p>
<p>(Medical and Training Facilities and Services) The school is to submit to KHSAA a picture of the usage schedule for the weight training room that is posted at the facility.</p>	<p>On or before <u>March 20, 2023</u></p>
<p>(Accommodation of Student Interest and Abilities) The school is to submit to KHSAA minutes for <u>at least three</u> Gender Equity Review Committee meetings held during the 2022-23 school year. The names of all committee members in attendance should be included in the minutes.</p>	<p>On or before <u>April 27, 2023</u></p>

PERSONNEL IN ATTENDANCE AT FIELD VISIT MEETING

Name	Title
Gary W. Lawson	KHSAA
Daniel Slaven	Student Athlete
Kaylee Lawson	Student Athlete
Sally Adams	Coach - Girls Basketball/Track
Petie Gilbert	Coach - Softball
Jesse Allen	Athletic Director
Carlena Carter	Cheer Coach

OTHER GENERAL OBSERVATIONS

Although not part of the current Title IX evaluation, 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 statute.

As per request, the school was asked for a listing of the locations of its Automated External Defibrillators. It was confirmed that there was an AED in the front lobby of the high school and another one in the auditorium. There is a third AED that is portable and transported by the athletic trainer.

No one from the community attended the Public Comments session which was advertised by the local radio station. The meeting was adjourned at 3:15 EST.